



RESPONSE TO FURTHER INFORMATION 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
County Hall
Marine Road
Dún Laoghaire
A96 K6C9

PREPARED BY:

TOM PHILLIPS + ASSOCIATES
80 Harcourt Street
Dublin 2
D02 F499

May 2025

Contents

1.0	introduction.....	3
1.1	Response to a Request for Further Information	3
1.2	Format of this Response	3
1.3	Project Team.....	3
1.4	Overview of Further Information Provided	4
1.5	Significant Further Information and Re-advertisement	4
1.6	Description of Development	4
2.0	Response to request for further information	6
2.1	Item 1 – Masterplan, Phasing and Protected Structures	6
2.1.1	Applicant’s Response to Item 1.....	6
2.2	Item 2 – Traffic and Transport.....	9
2.2.1	Applicant’s Response to Item 2.....	9
2.3	Item 3 – Pedestrian and Cycle Facilities	9
2.3.1	Applicant’s Response to Item 3.....	10
2.4	Item 4 – Dual Aspect Units	11
2.4.1	Applicant’s Response to Item 4.....	11
2.5	Item 5 – Proposed Residential Standards.....	13
2.5.1	Applicant’s Response to Item 5.....	13
2.6	Item 6 – Daylight and Sunlight	16
2.6.1	Applicant’s Response to Item 6.....	17
2.7	Item 7 – Environmental Impact Assessment Report (EIAR)	17
2.7.1	Applicant’s Response to Item 7.....	17
2.8	Item 8 – Appropriate Assessment Screening Report and Natura Impact Statement	18
2.8.1	Applicant’s Response to Item 8.....	18
2.9	Item 9 – Statement of Consistency	18
2.9.1	Applicant’s Response to Item 9.....	18
3.0	Conclusion	19

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01V902

Wednesday, 14th May 2025
[By Hand]

Dear Sir/Madam

RE: RESPONSE TO FURTHER INFORMATION REQUEST IN RELATION TO PROPOSED DEVELOPMENT AT THE FORMER CENTRAL MENTAL HOSPITAL, DUNDRUM ROAD, DUNDRUM, DUBLIN 14 AND AREAS OF DUNDRUM ROAD AND ST COLUMBANUS ROAD, DUBLIN 14.

ABP Ref. ABP-320912-24

1.0 INTRODUCTION

1.1 Response to a Request for Further Information

Dún Laoghaire-Rathdown County Council¹ (DLRCC) in partnership with the Land Development Agency² (LDA) (referred to hereon as the 'Applicant') has retained Tom Phillips + Associates³, Town Planning Consultants, to respond to the *Request for Further Information (RFI)* issued by An Bord Pleanála on the 11th March 2025.

The proposed development comprises of 934 no. residential units, including 926 apartments arranged in 9 blocks ranging between 2 and 8 storeys in height, with private and communal amenity open space provision and ancillary residential facilities, 6 no. three-bed duplex apartments and 2 no. 5-bed Assisted Living units. Also included in the proposal is a childcare facility, management suite, a medical centre, restaurant, 3 no. Retail units, change of use of the Gate Lodge to a cafe, and a community and sports facility.

The RFI outlines nine Items to be addresses regarding the proposed development. These items are outlined below with the applicant's detailed responses. A copy of An Bord Pleanála's *Request for Further Information* in respect of Ref. ABP-320912-24, is attached at Appendix A.

This Report seeks to provide an accessible summary of the Response; however the enclosed Reports and Drawings should be relied on.

¹ County Hall, Marine Road, Dún Laoghaire A96 K6C9.

² 4th Floor, Ashford House, Tara Street, D02 VX67.

³ 80 Harcourt Street, Dublin 2, D02 F449.

1.2 Format of this Response

This response to the Request of Further Information is set out as follows;

Section 1 sets out the introduction and context of the RFI Response,

Section 2 sets out the Applicant's response to each item in the *Request for Further Information*,

Section 3 lists the documents and drawings submitted as part of the RFI response,

Section 4 provides the Conclusion to the report.

The following documents are appended:

Appendix A: *Request for Further Information*, dated 11th March 2025.

1.3 Project Team

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

Table 1.1: 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



1.4 Overview of Further Information Provided

This Response to Further Information does not alter the redline boundary, nor significantly change the design of the proposed development such that the description of development would be altered.

However, the enclosures identify certain potential alterations to the scheme, which the Board may see fit to Condition. These include:

- A single-exit lane layout for the main vehicular exit onto Dundrum Road in place of the proposed two-lane exit (referred to as Option B);
- Revisions to the detailed design of the potential pedestrian/cycle link to Annville;
- Revised priority crossing arrangements for the Active Travel Route;
- Minor adjustment of certain windows on specific apartments;
- Further landscape detail in respect of Privacy Strips between apartments and adjoining public/communal open space.

Furthermore, new or additional information is provided in respect of, *inter alia*:

- Revised and additional information in respect of the Sunlight and Daylight impact assessment of neighbouring properties;
- Additional Traffic Assessment;
- Additional Heritage Impact Assessment, including additional mitigation measures in Chapter 17 of the Addendum EIAR (Volume 2 – Main Report);
- Revised Appendix 24.1 of the Addendum EIAR to include the additional mitigation measures identified in Chapter 17 (Volume 2 – Appendices).

1.5 Significant Further Information and Re-advertisement

Section 175(5)(c) of the *Planning and Development Act 2000 (as amended)* states the Board shall require re-advertisement where the Further Information response:

“contains significant additional data relating to—

(I) the likely effects on the environment of the proposed development, and

(II) the likely consequences for the proper planning and sustainable development in the area in which it is proposed to situate the said development of such development,

or

(ii) where the local authority has made the alterations to the terms of the proposed development specified in a notification given to it under paragraph (a)(ii)”

On the basis the additional information provided in this Response includes *inter alia* an Addendum EIAR and additional mitigation measures, we consider that the information provided is ‘significant’ per the terms of Section 175(5)(c) and therefore the Board shall require re-advertisement.

The mandates of both DLRC and the LDA require both organisations to work in the public interest, including support for public participation in the planning process.

Therefore, having regard to this and in light of the content of the Response to Further Information, the Applicant would welcome the opportunity to re-advertise the Further Information submitted, to allow interested parties participate further in this Part 10 Application.

1.6 Description of Development

The description of development remains unchanged, from the original statutory notices as a result of this Response to Further Information:

“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."

2.0 RESPONSE TO REQUEST FOR FURTHER INFORMATION

2.1 Item 1 – Masterplan, Phasing and Protected Structures

- (a) *The submitted hard copy of the Dundrum Central Masterplan is incomplete and only includes sections 1 to 9.7 (or part thereof). Notwithstanding the availability of the full document on the applicant's website, the applicant is required to submit full copies of the Masterplan in compliance with Objective CMH1 of the Dundrum Local Area Plan 2023.*
- (b) *Objective CMH1 of the Dundrum Local Area Plan 2023 requires that the Masterplan shall accord with the Guiding Principles and Objectives set out in the Site Development Framework for these lands.*

One of the Guiding Principles is 'To require the suitable protection and reuse of the protected structured at an early phase in the redevelopment of the site'. Given that the Masterplan proposes to develop the protected structures in the final phase, subject to a future planning application, the applicant is requested to clarify how approval of the current application would ensure the suitable protection and reuse of the protected structures at an early phase in the development of the overall lands.

In this regard, the applicant is invited to consider whether a condition could be applied to any approval of the current application that would allow for completion of part of the development but postpone commencement of other parts until the suitable protection and reuse of the protected structures is achieved.

In responding to the above, the applicant is also requested to consider sections 6.7.2 (I) and 13.5.4 of the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage and the Gaeltacht) with regard to the phasing of conservation works in tandem with other development.

- (c) *While the application acknowledges that the proposed development is within the immediate setting and curtilage of the 'Hospital Building' (RPS No. 2073 (referred to as 'The Infirmary' in the application documents)), Chapter 17 of the Environmental Impact Assessment Report does not consider the potential impacts on this structure in any detail. The applicant is requested to submit an assessment of the same.*

2.1.1 Applicant's Response to Item 1

2.1.1.1 Item 1(a) Hard Copy of the Masterplan

This Response includes further hard copies of the Masterplan in compliance with Objective CMH1 of the Dundrum Local Area Plan 2023.

We note that the soft copy version of the Masterplan provides the full extent of the Masterplan document, and this has been available on both on the Applicant's website for this Part 10 Application, as well as on the DLRCC file, the latter of which is available both online via DLRCC's planning system and at the public counter at the offices of the Council.

2.1.1.1 Item 1(b) Masterplan Phasing

Strategy for Delivery of Proposed Development

Dún Laoghaire-Rathdown County Council (DLRCC) in partnership with the Land Development Agency (LDA) have collaborated to prepare this Part 10 Application, which will deliver the first part of the development of the overall former CMH site.

An Agreement is in place between the Local Authority and the Land Development Agency which confirms the Local Authority's acceptance of the development strategy to develop the lands in two separate planning applications, accompanied by an overall Masterplan for the site which fully describes the scheme.

The Application reflects the mandates of both DLRCC and the LDA to work in the public interest, in this case through the delivery of housing at a time of urgent housing need and alignment with the Department of Housing, Local Government and Heritage to deliver the *Housing for All* mandate set out by the Government.

This Application seeks to deliver over 940 no. social and affordable residential units and a wide range of social and community facilities at an underutilised serviced urban site located in proximity to existing high-quality public transport, and a range of existing facilities.

The proposed housing tenure mix is 19% social housing to be delivered for DLRCC, and 81% affordable housing to be delivered by the LDA, which will be affordable purchase homes, assisted living and Cost Rental Apartments.

The Cost Rental model requires that all site development costs, maintenance and management costs for the scheme (including ancillary elements) are built into the rent charged to future tenants. There are financial constraints on the Cost Rental model, as the rent for these units is typically 20-25% lower than private market rent but can only be up to 35% of the household's net income. The construction and delivery costs of high-density Apartments are still high following cost uplifts experienced during the period following Brexit, Covid and continued cost inflation applied to materials and labour.

Part of the rationale for proposing that the adaptive reuse of the Protected Structures be subject to a separate future Planning Application is to ensure that the associated costs are separate from the housing units in order for the units to remain affordable.

Aside from this aspect of keeping management and maintenance costs low for the rental housing provision, a Management Company will also need to manage the entire estate, and costs will need to be apportioned to the affordable purchase homes as well to include for sitewide costs. This creates a constraint in terms of high overall delivery costs and the objective of keeping rents and sale prices affordable.

Current status - Ownership of Lands

The former CMH lands are currently in the legal ownership of the OPW and will remain so until such time as an implementable planning approval is secured, and certain other conditions are met, at which point ownership of the entire former CMH site will transfer to the LDA.

As there is currently an interim use on the existing lands, the LDA have not progressed the legal transfer of lands until this has been decanted and re-located. Therefore, not all of the management of the requirements to ensure the transfer of ownership are in the control of the LDA.

Any planning condition that requires development of lands or structures not in the ownership or control of the Applicant, and not within the redline boundary of the subject Planning Application, would not be enforceable. OPR Guidance on the matter suggests such a Condition should not be imposed on any planning approval:

“Conditions requiring development to be carried out on lands outside the control of the applicant prior to the commencement of development, or prior to the occupation of the development, cannot be complied with by the developer and so are not enforceable. Such conditions should not be imposed.” (Section 3.8, OPR Practice Note P03.)

Suggested Planning Approval Condition

To address the Board’s Request for Further Information, the Applicant is willing to accept the following condition:

“Within 12 months of the date of this planning approval, a Planning Application seeking the long-term active use of the Protected Structures within the former CMH lands shall be submitted to the Planning Authority or An Bord Pleanála.”

This condition would:

1. Acknowledge interim land use and ownership considerations while enabling timely housing delivery and providing a clear timeline for reuse of the Protected Structures.
2. Reflect a modified version of the condition proposed in the Chief Executive’s Report for the previous SHD application.
3. Ensure the current development is not delayed by requiring prior approval of the adaptive reuse, as the reuse application would align with the 6-year build timeline and likely planning permission duration.
4. Align with the intent of the LAP’s guiding principles without requiring phasing to be formalised by condition, thereby avoiding constraints on lands zoned for residential development.
5. Support urgent housing delivery in the context of a housing crisis, backed by a Housing Needs Demand Assessment confirming strong demand in Dublin 14.

The Applicant considers this condition reasonable and effective in ensuring progress on the Protected Structures without imposing a potentially unenforceable Grampian-style restriction.

Phasing of Planning Applications

The current Application does not include proposals for the main hospital building and associated Protected Structures due to several constraints:

- Survey and opening-up works could only begin after the former mental health facility vacated the site.

- The age and configuration of the buildings make adaptive reuse complex, with small individual rooms, solid masonry walls, and wide corridors limiting viable future uses.
- The LDA is working with DLRCC’s Conservation Officer to determine feasible alterations that align with an overall redevelopment strategy.

Given the urgent housing need, delaying the Application until these proposals were ready was deemed contrary to proper planning principles.

Submitting a separate Application for the Protected Structures after this Application is decided allows flexibility to respond to any required design changes and aligns with the 6-year construction timeline, though overlap in delivery cannot be guaranteed.

The future Application will include further residential development alongside the reuse of the Protected Structures, ensuring their integration into the Masterplan.

The proposed condition would secure submission of this follow-up Application within a reasonable timeframe.

Masterplan Provides for the Development of the Entire Former CMH Site

The Masterplan submitted with the current Planning Application guides the proper planning and sustainable development of the entire former CMH site. The Masterplan ensures that supporting infrastructure such as roads and campus wide utilities and services are developed in a holistic manner to ensure the entire Masterplan site will be appropriately serviced.

Sufficient public and communal open space will be provided across the site in an early phase of development; and the layout, scale and location of all new structures are considered in the context of the overall site. Thus, the current Application supports the future application and does not preclude the future adaptive reuse of the Protected Structures. The applications will result in a comprehensive planned development of the Masterplan lands.

The Masterplan (at Section 11) sets out several phasing options which were considered in arriving at the subject Planning Application. The preferred option for the proposed development provides for 3 phases of development. Phases 1 and 2 are included in this current Application and include structures within the attendant grounds of the Protected Structures, including most of the perimeter wall, Gate Lodge, and landscape including the walled garden and the large public open space in front of the main hospital building, which allows for the appreciation of that structure, which heretofore has not been visible to the public.

Active Preservation of Structures

The Dundrum Local Area Plan requires the ‘suitable protection’ of the Protected Structures within the CMH landholding at an early phase of the redevelopment of the site.

In this case the Protected Structures remain in the ownership of the OPW and are secured and maintained by the OPW. The overall site is secured by the high perimeter wall, and the only entry point is actively managed due to the ongoing use of the southern part of the site for IPAS accommodation. Therefore, no unauthorised access to the wider site is possible. As part of the active protection of the Protected Structures, the OPW is also responsible for the ongoing monitoring and management of the

historic structures. The heating system of the main hospital building is functioning and in use, which further assists with the protection of the building.

In respect of the further conservation of these structures, significant amount of research is ongoing with a view to providing for the adaptive reuse of these structures. Alastair Coey Architects, Conservation Architects for the Masterplan and Application Design Team, have completed a full Condition Survey and Inventory of the Protected Structures since the Planning Application was submitted.

In summary, the 'suitable protection' of the protected structures is assured in accordance with the requirements of the Dundrum Local Area Plan, through the existing management strategy. Once the LDA becomes the legal owner of the buildings, the Asset Management team will implement a management plan for the buildings pending their adaptive reuse.

Architectural Heritage Guidelines

The Board's Request for Further Information refers to two sections of the Architectural Heritage Guidelines. Section 6.7.2 relates to 'framing conditions in a planning permission', including at (l) reference to phasing:

"(l) phasing of work in a large-scale development so as to ensure that work to the protected structure is underway or will be completed in tandem with, or prior to, completion or occupation of new buildings." (Section 6.7.2) [Our emphasis.]

And Section 13.5.4 also relates to phasing of works:

*"Proposals are often made which combine works to a protected structure, often to allow a new use be made of it, with new development within its curtilage or attendant grounds. **Proposals for the existing structure should normally be made and considered together with those for any new development.** The new development can be phased in such a way to ensure that conservation works to the protected structure are satisfactorily carried out. In particular, where conservation works to the structure will be costly, a reasonable and **considered approach should be taken to the phasing of the development which ensures both that the protected structure is successfully conserved and the works satisfactorily completed.**"* (Section 13.5.4) [Our emphasis.]

Whilst the above quotes from the Architectural Heritage Guidelines encourage proposals to include the existing structure with any new development, the text states 'should normally', which we submit confirms that it is recognised that this approach is not always possible nor warranted, as is the case in this instance.

Section 13.5.4 notes that works can be costly and that in such cases a 'reasonable and considered' approach should be taken. The Protected Structures are the subject of maintenance and management by the OPW until such time as the buildings are in new ownership. Thus, the conservation of the buildings is already secured. Securing a long-term adaptive reuse of the Protected Structures requires further studies and that additional funding is secured to deliver the development.

As set out above, this Application falls outside the "norm" as it serves the purpose of addressing a much-needed housing demand. In the context of the ongoing need for housing, it is not considered appropriate to delay the delivery of over 940 no. social and affordable housing units until the delivery of the adaptive reuse of the Protected Structures is secured.

Furthermore, in circumstances where the Protected Structures are not included in the redline boundary and no works to those structures are proposed, the Guidelines apply in a limited manner.

It is considered that DLRCC and the LDA have reached an appropriate balance between the urgent need for social and affordable housing in urban locations, and the delivery of the long-term adaptive reuse of the Protected Structures.

Conclusion

The Applicant has considered both the *Dundrum Local Area Plan* and the *Architectural Heritage Guidelines* and considers that the proposed development is consistent with the objectives of these documents.

The existing landowner continues to be responsible for the suitable protection of the Protected Structure. On the future transfer of the landholding to the LDA, a Management Plan will be implemented until such time a new permanent use of the Protected Structures is secured. The current Application in no way precludes the ongoing protection of the structures nor their future adaptive reuse.

The Applicant would not welcome a Condition applied to any approval for the current Application that postpones the commencement or occupation of parts of the proposed housing development "until the long-term adaptive reuse of the protected structures is achieved". Such a proposal would have a negative impact on the implementation of the proposed development, the primary purpose of which is to deliver over 940 no. social and affordable homes, with impacts on timeframes and construction costs and ultimately rents. It is also considered that it may not be legally possible to apply such a Condition having regard to the site ownership.

It is not considered consistent with the proper planning and sustainable development of the area to delay the subject development until such time as the adaptive reuse of the Protected Structures is secured, particularly where those structures are being actively managed and the complex process of designing an entirely new use for the structures is well underway in partnership with Dún Laoghaire Rathdown County Council's Conservation Officer.

The Applicant respectfully request the Board to attach the proposed Condition if considered appropriate, to balance the proper planning and sustainable development associated with realising the Guiding Principles of the LAP and the urgent delivery of housing.

2.1.1.2 Item 1(c) Infirmary Building

The enclosed *Addendum to the Environmental Impact Assessment Report VOL 2 Main Report*, dated May 2025 provides a revised Chapter 17 Architectural Heritage prepared by Alistair Coey Architects. Additional mitigation measures are proposed. For completeness, this Response includes an *Addendum to the Environmental Impact Assessment Report VOL 2 Appendix*, dated May 2025 and *Addendum to the Environmental Impact Assessment Report VOL 1 Non-Technical Summary*, dated May 2025. The Alastair Coey Architects' *Historic Landscape Statement of Significance and Impact Assessment*, Rev B, dated 30 April 2025, has also been updated for consistency.



2.2 Item 2 – Traffic and Transport

(a) Regarding the submitted Traffic and Transport Assessment, the applicant is requested to outline a clearer and more detailed explanation for the translation of 'Total Person Based Trip Rates' (Table 7.1) to 'Final External Vehicular Based Trip Generation' (Table 7.2). The applicant is requested to clarify:

- (i) The difference between the 'Driver' mode share (44%) in the Traffic and Transport Road Assessment, compared to the 40% mode share used in the Environmental Impact Assessment Report.
- (ii) Calculations showing how the 'driver' mode share was applied to the 'total trips' and the resultant total for 'vehicular trips'
- (iii) Calculations showing how the estimated internal and external trip rates (as per section 7.3.10) were applied to the total number of vehicular trips, and the resultant estimated number of external vehicular trips.

(b) Notwithstanding the submitted response to the National Transport Authority observation, the applicant is requested to clarify the design rationale for the proposed two-lane vehicular exit onto Dundrum Road, particularly with reference to section 4.4.3 of the Design Manual for Urban Roads and Streets (Government of Ireland, 2019). In doing so, the applicant is requested to submit a design proposal for a one-lane exit option, along with a traffic impact assessment of its junction performance compared to the two-lane proposal.

2.2.1 Applicant's Response to Item 2

ILTP, Transport Consultants, have prepared the response to this Item, in association with Barrett Mahony Consulting Engineers.

2.2.1.1 Item 2(a) – Figures in Traffic and Transportation Assessment

ILTP Consultants prepared the enclosed Transport Response to Further Information Report, dated 25 April 2025. The enclosed Traffic and Transportation Assessment and Mobility Management Plan (TTA), dated April 20225 provides an update to that Report.

In respect to Item 2(a)(i) the Transport Response to Further Information Report clarifies the discrepancy in the figures used in the earlier version of the TTA. ILTP confirms that:

"The traffic data and analysis underpinning the TTA and EIAR assessments are identical. While the text, tables and figures in the EIAR are all correct, a section of the TTA (pp: 48-51 inclusive) included some text, tables and graphics that had not been updated to reflect the final trip rates and mode share assumptions actually used in the traffic assessments. Some of the information from a previous iteration of the report was included in the final version of TTA due to an oversight."

The traffic data in Chapter 18 of the EIAR, Material Assets – Roads and Traffic submitted with the Part 10 Application in September 2024, is correct. Furthermore, the sections of the EIAR informed by the

operational phase traffic figures (for example Chapter 11, Air Quality, Chapter 14, Noise and Vibration) were based on the correct figures and are therefore accurate.

In relation to Items 2(a)(ii) and (iii), the enclosed ILTP Response to Further Information Request Report provides further calculations to clarify the figures presented in the TTA, and updated version of which is included for completeness.

2.2.1.2 Item 2(b) – Single Lane Vehicular Access Option

ILTP's enclosed Transport Response to Further Information Report, dated 25 April 2025, and the enclosed Barrett Mahony Consulting Engineers Drawing entitled Dundrum Road Access Junction (South) Option B – Single Exit Lane (Dwg. No. DCD-95-ZZ-XX-DR-BMD-CE-11106, Rev P1) provide the response to this Item.

The Transport Response to Further Information Report provides further traffic modelling for the one-lane exit option. It concludes in respect of Item 2(b) that:

"a single or two-lane exit from the proposed development onto Dundrum Road are both satisfactory in traffic capacity terms. The main benefit of the two-lane exit is that additional green time is allocated to Dundrum Road traffic. In addition, there is a likelihood that the emergency access to the north would be required less often as the two-lane exit provides some additional flexibility to deal with minor incidents, such a vehicle breakdown on the exit from the proposed development. The single-lane option would have the benefit of reducing pedestrian crossing time and distance across the proposed access road."

Both the original and revised access layouts are generally in accordance with section 4.4.3 of the Design Manual for Urban Road and Streets (DMURS).

The applicant has no objection to the proposed access being reduced to a single exit lane should ABP deem it appropriate."

The ILTP Transport Response to Further Information Report demonstrates that both Options for the junction to Dundrum Road will operate satisfactorily.

The Applicant respectfully invites the Board to attach a Condition requiring the implementation of the single-lane exit option (Option B per Barrett Mahony Consulting Engineers, Dundrum Road Access Junction (South) Option B – Single Exit Lane, Dwg. No. DCD-95-ZZ-XX-DR-BMD-CE-11106, Rev P1) if considered appropriate.

2.3 Item 3 – Pedestrian and Cycle Facilities

(a) Notwithstanding the submitted response to the National Transport Authority observation, the applicant is requested to clarify the design of the proposed cycle route and priority arrangements for cyclists/pedestrians in accordance with the Cycle Design Manual (National Transport Authority, 2023). In this regard, the applicant is requested to clarify the apparent differences in priority arrangements in the 'Landscape Layout Overall Plan' (Drawing No. DSRM-ACM-00-ST-DR-L-1000) and the 'Road finishes, road markings and signage' drawing (No. DCD-BMD-00-00-DR-C-11001).

(b) *Notwithstanding the submitted response to the third-party observations, the applicant is requested to clarify the design rationale for the proposed cycle/pedestrian link to Annville Park/Grove, including:*

- (i) *The deficiency in cycle/pedestrian facilities within Annville Park/Grove and the absence of detailed upgrading proposals for same.*
- (ii) *The transition into Annville Park/Grove and the sightlines available for motorists, pedestrians, and cyclists.*
- (iii) *Whether a detailed proposal for this link could be more appropriately submitted and delivered as part of a future application in accordance with Objective CMH3 of the Dundrum Local Area Plan 2023.*

2.3.1 Applicant's Response to Item 3

The Response to this Item has been prepared by Barrett Mahony Consulting Engineers in conjunction with AECOM Landscape Consultants and Tom Phillips + Associates.

2.3.1.1 Item 3(a) – Cycle and Pedestrian Design

The enclosed Barrett Mahony Consulting Engineers Drawing entitled *Roads Finishes, Road Markings & Signage*, Dwg. No. DCD-BMD-00-00-D-C-11001, Rev P5, has been revised to provide combined pedestrian and cyclist zebra crossing points in accordance with the NTA Cycle Manual as well as additional signage to clarify the priority arrangements for cyclists/pedestrians. The Barrett Mahony Consulting Engineer's drawing should be relied upon in respect of the design of the proposed priority arrangements for pedestrians and cyclists, including road markings and signage.

Furthermore, the Aecom Landscape Consultants Drawing entitled *Landscape Layout Overall Plan* (Dwg. No. DSRM-ACA-00-ST-S-R-L-1000, Rev P8) has been updated to omit road markings on the Active Travel Route as the Barrett Mahony Consulting Engineers Drawing should be relied on for all detail in this regard. (See also the enclosed Aecom Landscape Consultants Drawings entitled *Landscape Layout Detail Area Sheets* 1/4 to 4/4, Dwg Nos. DSRM-ACM-00-ST-DR-L-1001, Rev 8 to L-0004, Rev P8.)

2.3.1.2 Item 3(b) – Interface with Annville Park/Grove

The enclosed Barrett Mahony Consulting Engineers Drawing *Roads Finishes, Road Markings & Signage*, Dwg. No. DCD-BMD-00-00-D-C-11001, Rev P5, is updated to provide additional information in respect of this connection.

Context

We reiterate that the pedestrian and cycle permeability measures at Annville and Rosemount Green are included as an Objective of the DLAP, and the provision of these links are fully supported by the NTA observation. It is also noted that planning permission was previously been granted for this connection in 2023 through the SHD Application (ABP Ref. ABP-313176-22).

This pedestrian/cycle link is not considered essential to the proposed development. Pedestrians and cyclists within the proposed development would have an additional c. 290 m further to walk or cycle if this proposed link is not provided, and they have to rely on the main junction at Dundrum Road instead (based on the approximate walking distance between these two points within the proposed layout). The connection between the site and Annville Grove may, therefore, be of greater benefit to the

existing residents of Annville Grove and nearby streets by providing easier access to the facilities and services within the proposed development, than it is to the residents of the scheme.

Revised Drawing

The project engineers Barrett Mahony Consulting Engineers have consulted further with Dún Laoghaire-Rathdown County Council in respect of the detailed design of this pedestrian/cycle link.

The enclosed Barrett Mahony Consulting Engineers *Roads Finishes, Road Markings & Signage*, Dwg. No. DCD-BMD-00-00-D-C-11001, Rev P5, provides an updated version of this pedestrian/cycle link.

The opening in the wall is relocated slightly southward to align with the existing public footpath in Annville Park. Furthermore, the Annville Park footpath is shown as extended up to the new opening, across the front of the driveway to Annville Lodge (the front boundary and access of Annville Lodge will remain unchanged). Additional signage is provided instructing cyclists to dismount either side of the link and as pedestrians and dismounted cyclists will enter Annville by the extended footpath any issues with sightlines for motorists, pedestrians and cyclists is removed.

Furthermore, the reinstatement and extension of double yellow lines at Annville will discourage any drop offs, which are any considered unlikely to be a significant issue having regard to the confined space available for turning manoeuvres.

The redline has not been extended having regard to the nature of the works to Annville and DLRCC's status as the Road Authority and as DLRCC have control of this road and adjacent public roads in Annville.

The Applicant is willing to accept a Condition from the Board to construct this alternative version of the proposed connection to Annville as shown on the attached BMCE drawing.

Alternatively, on the basis the link is not critical to the successful operation of the proposed development, if the Board considers it more appropriate the connection could be omitted by Condition and delivered as part of a future application, or by alternative process.

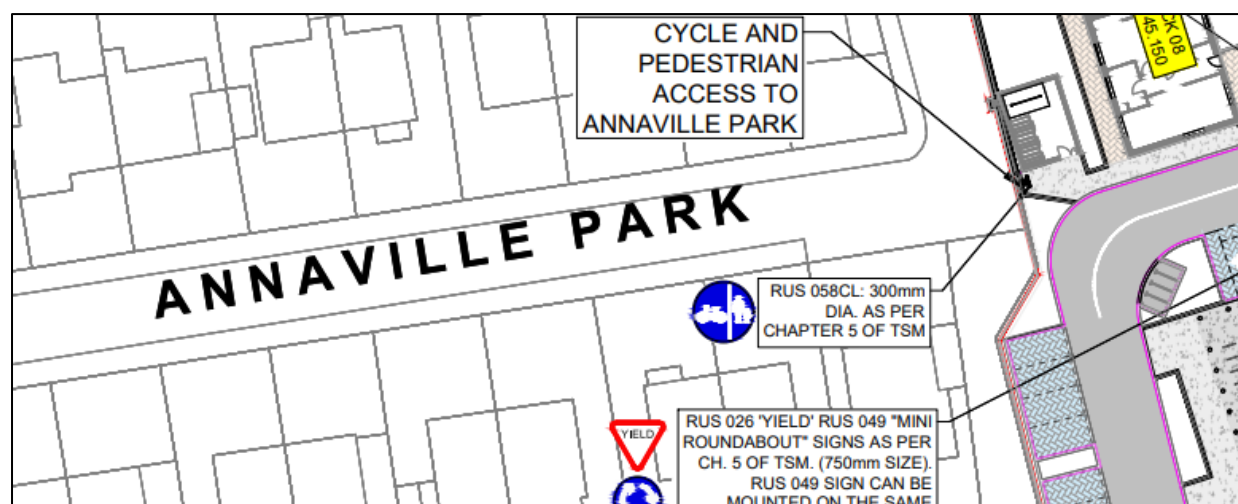


Figure 2.3.1: Extract from Barrett Mahony Consulting Engineers Drawing entitled Roads Finishes, Road Markings & Signage (Dwg. No. DCD-BMD-00-00-D-C-11001, Rev P4, submitted with original Part 10 Application documentation.)

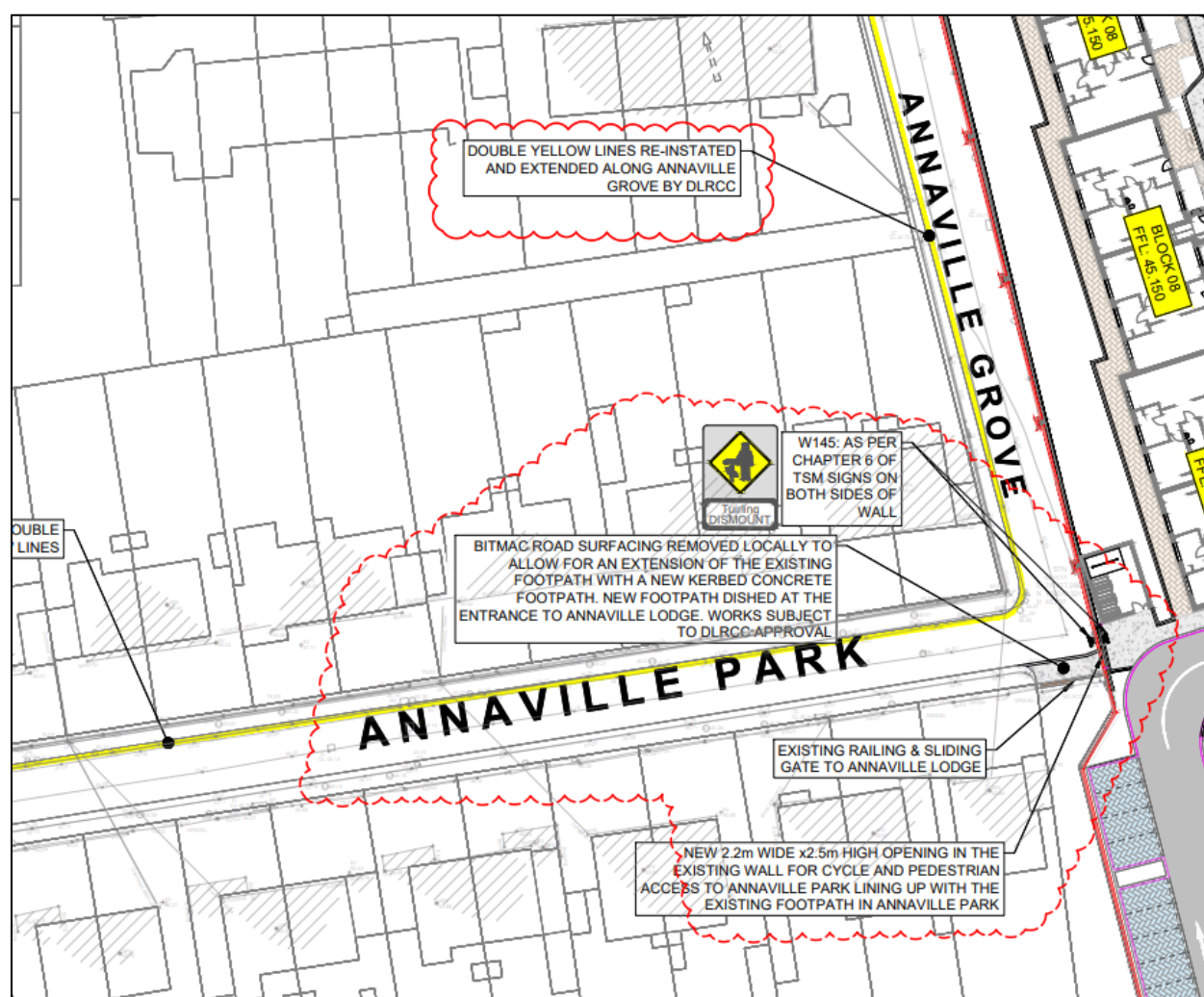


Figure 2.3.2: Extract from updated Barrett Mahony Consulting Engineers Drawing entitled Roads Finishes, Road Markings & Signage (Dwg. No. DCD-BMD-00-00-D-C-11001, Rev P5, enclosed with this response).

2.4 Item 4 – Dual Aspect Units

Having regard to points (a) to (c) below, the applicant is requested to clarify the correct number of Dual Aspect units and compliance with section 12.3.5.1 of the Dún Laoghaire-Rathdown County Development Plan 2022-2028:

- Appendix B of the Housing Quality Assessment Report refers to a grand total of 936 units, 471 of which are stated to be dual aspect. However, only 934 units are proposed.
- In Block 10, apartment units B10-00-19 and B10-00-20 are stated to be dual aspect, whereas the floor plans show that they are single aspect units.
- In Block 7, the applicant is requested to clarify the classification of some units as dual aspect units having regard to the criteria outlined in section 12.3.5.1 of the Dún Laoghaire-Rathdown County Development Plan 2022-2028, particularly given the proximity of secondary aspects to adjoining walls/steps and the limited views afforded to these aspects. The applicant is requested to address this matter in respect of the following units:

B07-01-21, B07-02-21, B07-03-21, B07-04-21, B07-05-21, B07-06-12, B07-00-05, B07-00-03.

2.4.1 Applicant's Response to Item 4

Reddy Urbanism and Architecture prepared the Response to this Item, which is supported by the enclosed *Housing Quality Assessment Report*, dated May 2025, which includes updated dual aspect diagrams at Appendix B.

Section 12.3.5.1 of the Development Plan

As noted in the Statement of Consistency (section 4.4) according to SPPR 4 of the Apartment Guidelines, the requirement for schemes in central and/ urban accessible locations of 33% and it is considered this figure applies to the proposed development.

"12.3.5.1 Dual Aspect in Apartments

A dual aspect apartment is designed with openable windows on two or more walls, allowing for views in more than just one direction. The windows may be opposite one another, or adjacent around a corner. The use of windows, indents or kinks on single external elevations, in apartment units which are otherwise single aspect apartments, is not considered acceptable and/or sufficient to be considered dual aspect and these units, will be assessed as single aspect units.

Specific Planning Policy Requirement (SPPR) 4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2020), provides guidance with respect to the minimum number of dual aspect apartments that may be provided in any single apartment schemes. In accordance with this guidance, DLR as a County is classified as a suburban or intermediate location and therefore:

- There shall generally be a minimum of 50% dual aspect apartments in a single scheme.
- For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, DLR may exercise discretion to consider dual aspect unit provision at a level lower than the 50% minimum outlined above on a case-by case basis, but subject to the achievement of overall high design quality in other aspects."

2.4.1.1 Item 4(a) – Appendix B of Housing Quality Assessment Report

The discrepancy identified in Item 4(a) was a typo in the schedule shown on the title block of the dual aspect drawings within the *Housing Quality Assessment Report* submitted with the Part 10 Application in September 2024.

The table has been corrected in the enclosed *Housing Quality Assessment Report* dated May 2025 to reflect the accurate number of proposed units (934 No. units in total).

The number of dual aspect units is 467 No., which is 50% of the total number of units across the proposed development. Thus, the proposed development is compliant with Section 12.3.5.1 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

2.4.1.2 Item 4(b) – Block 10 - Unit Nos. B10-00-19 and B10-00-20

The Board's observation is correct, Unit Nos. B10-00-19 and B10-00-20 are, in fact, single aspect due to their location adjacent to the Block 10 Ground Floor entrance near Dundrum Road. The enclosed AU Dual Aspect Plans (see Appendix B of the *Housing Quality Assessment Report*) have been updated accordingly to reflect their correct classification.



Figure 2.4.1: Extract from enclosed Dual Aspect Plan Level 00 of Block 10 (see Appendix B of the enclosed HQA).

The enclosed *Housing Quality Assessment Report*, dated May 2025, has also been updated accordingly.

2.4.1.3 Item 4(c) – Block 7 Dual Aspect Design (Units B07-01-21, B07-02-21, B07-03-21, B07-04-21, B07-05-21, B07-06-12, B07-00-05, B07-00-03)

- Unit B07-00-05

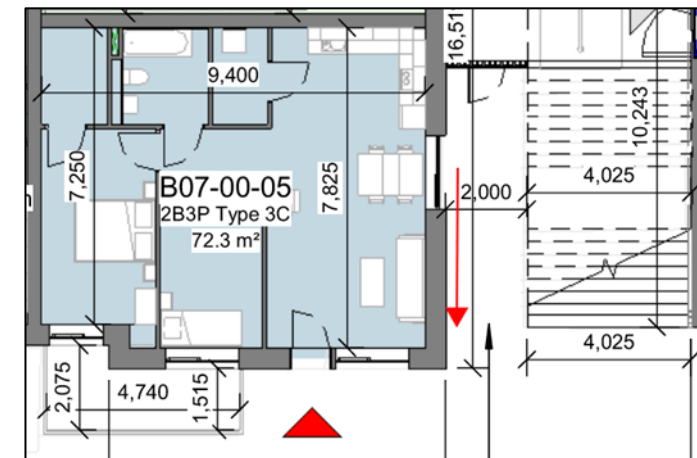


Figure 2.4.2: Unit B07-00-05 indicating relocation of window. (Source: Enclosed HQA.)

It is proposed to reposition the window on the east elevation further south, away from the podium edge, during the Detailed Design Stage to enhance access to both sunlight and daylight. The space in question is a living room that meets the minimum daylight/sunlight requirements. With the relocated window closer to the external edge this will be improved further.

Furthermore, oblique views to the southeast will be available from this window towards the open space located between Blocks 5 and 6. In relation to the above, the design team believes that this unit can be considered a dual aspect unit.

- Unit B07-00-03

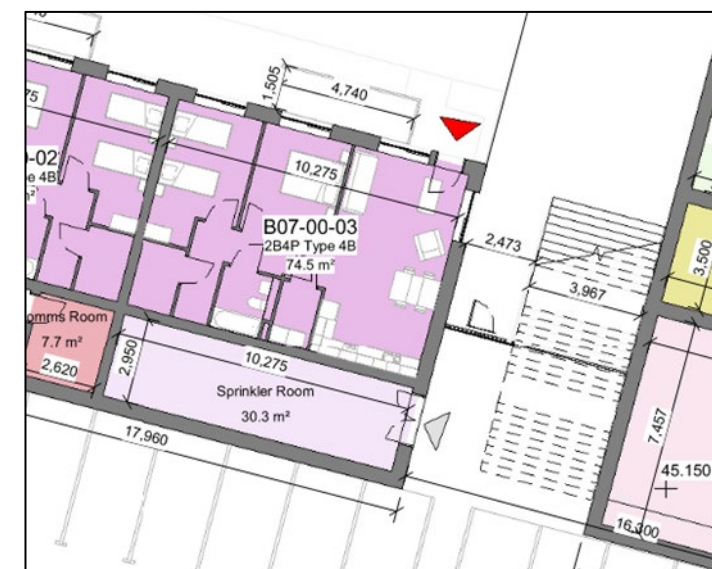


Figure 2.4.3: Unit B07-00-03

For Unit B07-00-03, the design team considers that the unit in question satisfies the criteria for classification as dual aspect. Whilst it is acknowledged that the secondary aspect faces a stair core, there is a sufficient separation distance of over 2,400mm between the window and the staircase structure to improve the provision of natural light in this unit.

- Units B07-01-21, B07-02-21, B07-03-21, B07-04-21, B07-05-21, B07-06-12

B07-01-21, B07-02-21, B07-03-21, B07-04-21, B07-05-21, B07-06-12 are units that maintain a separation distance of over 4,000 mm from the opposing wall, providing adequate space to ensure natural light penetration, cross ventilation and visual relief, supporting their classification as dual aspect.

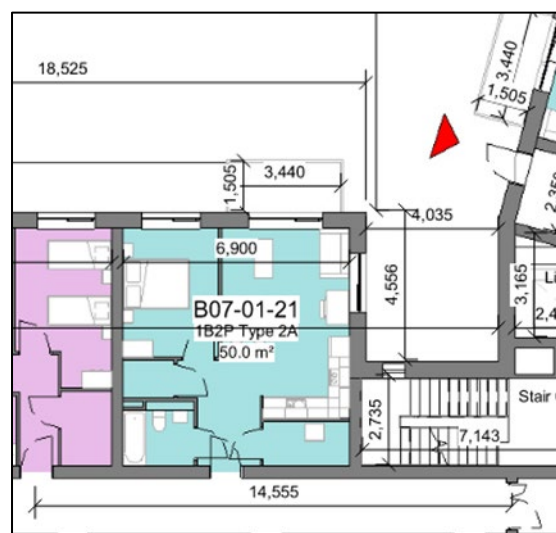


Figure 2.4.4: Unit B07-01-21

2.4.1.4 Conclusion

The proposed units identified in Appendix B of the *Housing Quality Assessment Report*, dated May 2025 are considered to provide a sufficient second aspect providing for better daylight and sunlight penetration and cross ventilation and views such that they should be assessed as dual aspect units.

As elaborated in the Response to Item 5(c), the Applicant's preference is for a Condition not to be attached that would require the use of these units as further residential amenities. The proposal provides for a social and affordable development, and residents will already benefit from an unusually wide range of services and facilities on site, as well as those existing in the surrounding area.

2.5 Item 5 – Proposed Residential Standards

Amenity Space

- Objective CMH5 of the Dundrum Local Area Plan 2023 is to 'Require the provision of privacy buffers for ground floor residential units'. The applicant is requested to demonstrate compliance with same, including the submission of drawings showing the interface with adjoining public/communal areas.
- The communal amenity space for Blocks 4&5, as stated in the Housing Quality Assessment Report, is less than that indicated on the 'Open Space Plan' (drawing no. DCD-02-SW-ZZZ-DR-RAU-AR-1004). The applicant is requested to clarify the correct figures.

Communal Facilities

- Having regard to the significant scale of the proposed development, and notwithstanding the submitted 'Statement of Consistency' and the extent of proposed commercial/retail units and community facilities to be shared with the wider community, the applicant is requested to clarify proposals for dedicated amenities and facilities for future residents, particularly for the larger blocks. In responding to this point, the applicant is requested to address the following:
 - In line with 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (Department of Housing Local Government and Heritage, 2023), Objective H3 of the Dundrum Local Area Plan encourages the provision of accessible communal rooms and/or facilities for the use of future residents in new residential apartment developments of 50+ units.
 - Section 12.3.5.3 of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 outlines that apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements.
 - The potential for the provision of additional amenities and facilities in place of some units referenced in Point 4 'Dual Aspect Units' above.

2.5.1 Applicant's Response to Item 5

The Response to this Item has been prepared by Tom Phillips + Associates in conjunction with Reddy Architecture + Urbanism and Aecom, Landscape Architect.

2.5.1.1 Item 5(a) - Privacy Buffers

In considering this issue, please refer to the enclosed AECOM Drawings:

- *Landscape Layout Overall Plan*, Dwg No. DSRM-ACM-00-ST-DR-L-1000, P8;
- *Landscape Layout Detail Area Sheet 1/4*, Dwg No. DSRM-ACM-00-ST-DR-L-1001, P8;
- *Landscape Layout Detail Area Sheet 2/4*, Dwg No. DSRM-ACM-00-ST-DR-L-1002, P8;
- *Landscape Layout Detail Area Sheet 3/4*, Dwg No. DSRM-ACM-00-ST-DR-L-1003, P8;
- *Landscape Layout Detail Area Sheet 4/4*, Dwg No. DSRM-ACM-00-ST-DR-L-1004, P8;
- *Block 10 & 7 Planting Buffer Sections*, Dwg No. DCD-ACM-ZZ-00-DR-L-006003, 02.

The interface between Ground Floor Level units and adjoining public areas has been designed to provide privacy to those units. The landscaping drawings submitted with the Application include on the legend and the drawings 'Hedge Planting (privacy hedge planting to ground floor units)'.

The enclosed AECOM Drawing titled *Block 10 & 7 Planting Buffer Section* (Dwg No. DCD-ACM-ZZ-00-DR-L-006003, 02) provides supplementary Sections through the Ground Floor of Block 10 and Block 7. This illustrates the interface between the Ground Floor Level Private Terrace, Hedge Planting, and the adjoining Shared Surface/Footpath and Roadway. These Section Drawings show that the Hedge Planting will be c. 1.1m in height and 0.8m in depth (Block 10). In some cases (such as at Block 07) there will be additional separation provided by an area of Shrub Mix planting between the Private Terrace and the Hedge Planting, resulting in a separation distance of 2.7m between the Private Terrace and the outside face of the Hedge Planting.

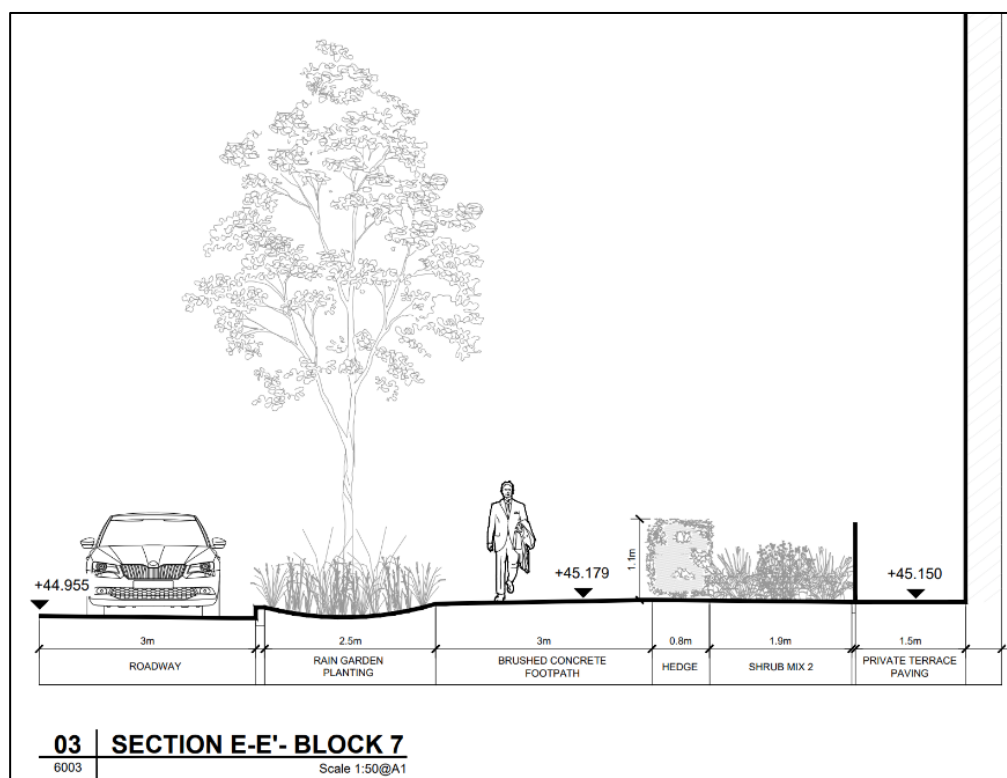


Figure 2.5.1: Drawing extract illustrating Privacy Hedge at Block 7. (Source: AECOM Drawing *Block 10 & 7 Planting Buffer Section* Dwg No. DCD-ACM-ZZ-00-DR-L-006003, 02.)

In respect of the interface between Podium Level Apartment Terraces and adjoining Communal Open Spaces, the enclosed Landscape Layout drawings show all podium level units have a strip of 'Podium Shrub Mix' between the terrace and the adjoining Communal Open Space.

The enclosed AECOM Drawing titled *Block 10 & 7 Planting Buffer Section* (Dwg No. DCD-ACM-ZZ-00-DR-L-006003, 02) includes an example section of the Block 10 Podium, which is to be replicated elsewhere. This shows a Shrub Mix 0.8m in height and c. 1m in width between the Private Terrace and the adjoining pathway through the Communal Open Space. Podiums are designed so that seating is more centrally located within the podium and does not directly face adjoining apartments. Thus, the privacy of Podium Level apartments is assured.

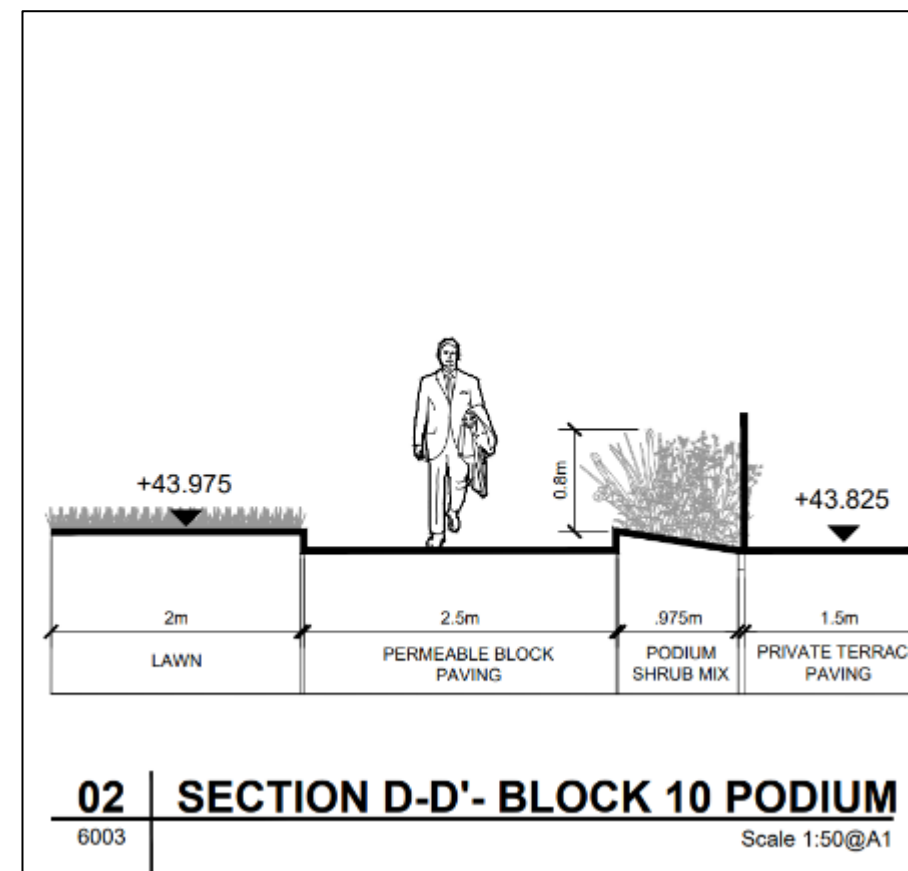


Figure 2.5.2: Drawing extract illustrating Shrub Planting for Privacy at Block 10 Podium. (Source: AECOM Drawing *Block 10 & 7 Planting Buffer Section* Dwg No. DCD-ACM-ZZ-00-DR-L-006003, 02.)

2.5.1.2 Item 5(b) – Communal Amenity Space

The correct figures are those provided in the RAU Drawing entitled *Open Space Plan*, Dwg. No. DCD-02-SW-ZZZ-DR-RAU-AR-1004, which was previously submitted with the Part 10 Application documentation.

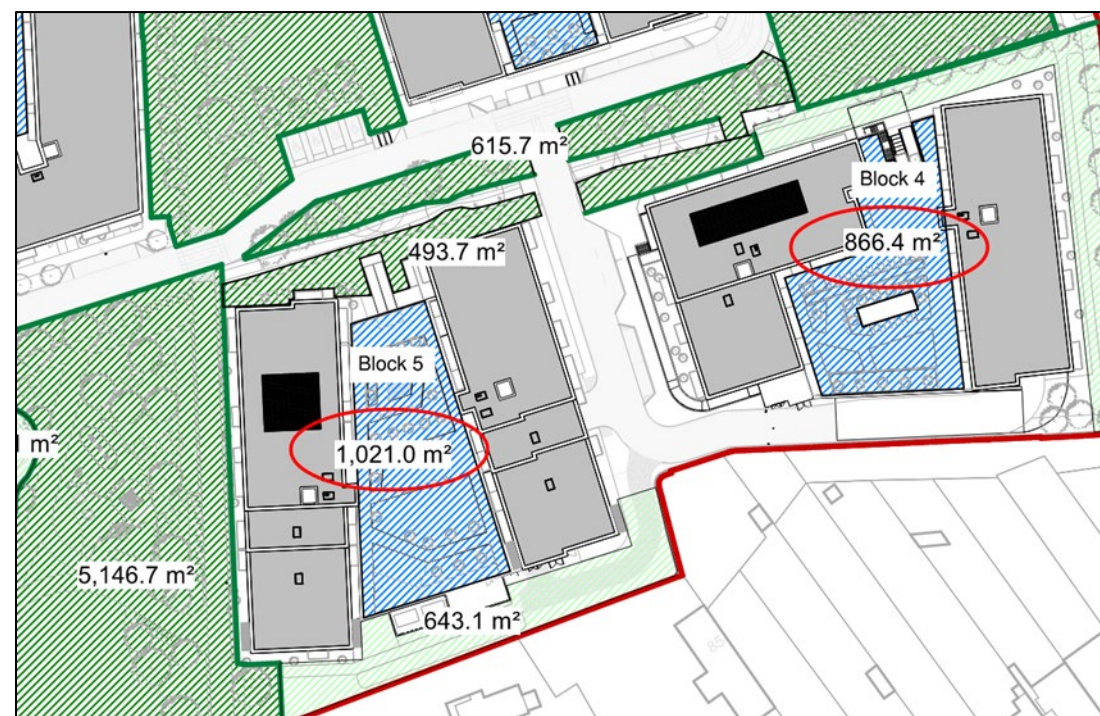


Figure 2.5.3: Extract from RAU Drawing entitled *Open Space Plan* (No. DCD-02-SW-ZZZ-DR-RAU-AR-1004).

This discrepancy was due to an error on page 24 of the *Housing Quality Assessment Report* relating to Blocks 4 and 5. The enclosed *Housing Quality Assessment Report* dated May 2025 has been updated and it provides the correct figures.

Importantly, the larger figure is the correct figure (i.e. a total of c. 9,388 sq m Communal Open Space) and the resulting assessments can be relied upon.

2.5.1.3 Item 5(c) Communal Facilities

Item 5(c)(i) Amenities for Future Residents

The proposed development will provide a high-quality environment for the future residents of the development having regard to the extent of services and facilities to be provided within the scheme, mature landscaping and varied types of open spaces, historic buildings, and permeability linkages.

Few apartment developments would provide a comparable quantum and range of additional facilities that are proposed within this development. Furthermore, the residents will benefit from the existing facilities in the surrounding area in this long-established part of Dublin.

Objective H3 of the Dundrum LAP encourages rather than requires the provision of communal rooms:

“Objective H3 – Communal facilities:

In line with the section 28 Guidelines “Sustainable Urban Housing: Design Standards for New Apartments” the Planning Authority will encourage provision of accessible communal rooms and/or facilities for the use of future residents in new residential apartment developments of

50+ units. Such communal facilities should have regard to the needs of all future residents of all ages and abilities. Where such facilities are to be provided details of the management shall be submitted and agreed by the planning authority at application stage.” (Dundrum Local Area Plan, 2023.)

The Apartment Guidelines, 2023 refer to the provision of Communal Facilities in Sections 4.5-4.7, which is quoted in full below for context:

“Communal Facilities

4.5 Communal rooms may be provided in apartment schemes, particularly in some larger developments. For example, communal laundry facilities and for drying clothes may be provided in well-ventilated areas. **Other communal facilities may include community or meeting rooms or a management/maintenance office** on-site. The **provision of facilities within an apartment development could also extend to childcare or gym uses that may be open to non-residents.**

4.6 Communal or other facilities within apartment schemes should be subject to negotiation and agreement with the developer as part of the planning process. They should not generally be imposed as requirements by the planning authority in the absence of proposals from and/or the agreement of an applicant. **The provision of such facilities is likely to have significant implications for management and maintenance costs for future residents.**

4.7 Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the **provision of one child-care facility** (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to 21 the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.” (Apartment Guidelines, 2023.)**

The Apartment Guidelines therefore identify community/meeting rooms, management/maintenance offices as relevant facilities, in addition to childcare or gyms open to non-residents. These facilities are provided in Blocks 10 (management suite and childcare facility); Block 6 (sports facilities, and meeting rooms which are available to the public); as well as at Block 03 (internal amenity space for residents).

Whilst not referred to in the Apartment Guidelines, proximity to additional on-site services such as the medical facility at Block 02, the Café at the Gate Lodge, restaurants and retail in Blocks 03 and 07 are relevant to the assessment of the range and distribution of facilities within the development.

In summary, the Apartment Guidelines do not identify a particular ratio of communal facilities to be provided, nor do they require the facilities to only serve the residents (as evidenced in the reference to gyms and childcare), and the facilities can include management/maintenance office, which is a service that would support residents but not necessarily be a space available to residents.

The Apartment Guidelines explicitly acknowledge the financial implications for residents arising from the management and maintenance associated with additional facilities. In this case, the residential component of the development comprises social and affordable housing, with the greatest proportion of the units comprising cost rental units. Under that funding model construction and maintenance costs are ultimately factored into the rents charged to future residents.

Therefore, considering the wide range and distribution of additional services proposed across the site, the context of the Application as a social and affordable housing led development which is cost sensitive, and the site's location in a well-established part of the city with existing services, further communal facilities for residents are not required within in a development that will provide a high quality living environment in an attractive setting.

Item 5(c)(ii) Storage

The proposed apartments have all been provided with at least the minimum storage space required, with many units benefiting from a larger quantum of storage within their unit. Furthermore, secure long term cycle stores are provided for residents across the scheme, including for cargo bike spaces. Therefore, residents have been provided with storage facilities within the apartments and for bicycles.

The Development Plan states:

*“Apartment schemes **should** provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These **storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.**” (Section 12.3.5.3.)*

The use of the phrase ‘should’, rather than ‘shall’, indicates that this is not an obligation but a recommendation, as has previously been confirmed by ABP Inspector Reports⁴.

There is limited Lower Ground Floor ancillary space within the scheme, which accommodates facilities such as refuse storage, cycle stores, plant and limited amounts of car parking, therefore unless some of the Sheffield cycle stands were converted to a more space efficient system, there would be limited opportunity to accommodate bulky stores in these locations.

The provision of stores at the external face at Ground or Lower Ground Level in this particular scheme would have a negative impact on the interface between the Blocks and the adjoining public or communal spaces having regard to the number of Blocks which address open space on each façade. Bulky stores would by necessity have to have blank inactive frontages which would be particularly inappropriate adjoining building entrances, which as proposed benefit from passive surveillance.

The Applicant's preference in this instance is for the scheme to remain unchanged, particularly having regard to the social and affordable nature of the housing proposed.

⁴ ABP Ref. 314131, Inspector's Report “this does not appear to be an explicit requirement based on the wording of the section stating that Apartment schemes should provide external storage for bulky items outside individual units (i.e., at ground or basement level), in addition to the minimum apartment storage requirements. This is not a definitive requirement and would appear to allow for discretion to be exercised”. Whilst that scheme was refused permission it was not on the basis of bulky storage.

Item 5(c)(iii) Replacement of Certain Units to Provide Additional Facilities

The proposed development meets all relevant standards and, in many cases, exceeds those standards. The scheme also provides a wide range of services and facilities spread across the site. The development context further benefits from the setting provided by the historic structures to be retained, as well as mature trees and a range of open space types including play spaces, a walled garden, and meadows.

Whilst further facilities such as additional communal rooms and bulky storage spaces could be provided in place of certain units, in the context of the overall quality of the development this is not warranted. The policies referred to are silent on quantum, and do not appear to be relevant to a scheme that already provides an unusually wide range of facilities and services on site catering to all age groups.

Furthermore, as noted in the Apartment Guidelines, 2023, the provision of additional facilities results in additional costs, including at construction, management and maintenance stage. The proposed development provides social and affordable housing, catering to a verifiable housing need. The greatest of the tenures proposed is cost rental housing, a form of affordable rental housing. The rent for cost rental housing is arrived at through inputs, including proportional construction, management and maintenance costs. Therefore, unless the Board considers the replacement of residential units with additional facilities over and above those already proposed to be critical to the delivery of the proposed development, the Applicants' preference is not to change this aspect of the proposed development as it is considered the proposed development provides an appropriate level of amenity for residents of the scheme.

2.6 Item 6 – Daylight and Sunlight

The applicant is requested to clarify the following and submit proposals accordingly:

- (a) Section 5.2 of the ‘Internal Daylight, Sunlight and Overshadowing Report’ appears to incorrectly refer to a total of 2,310 rooms assessed for daylight illuminance levels, and a total of 1,496 rooms that would meet or exceed the 150-lux target.*
- (b) In the ‘Daylight & Sunlight Impact on Neighbouring Properties Report’, the stated total of 12 north-facing windows at Block 2 of Annville Residences (based on Dún Laoghaire-Rathdown County Council Planning Portal drawings (P.A. Reg. Ref. D03A/0279)) would not appear to be consistent with that constructed on site. Assessments should be provided for existing window arrangements on site.*
- (c) Notwithstanding the Transient Overshadowing Study Submitted, the overshadowing impact on existing amenity areas has not been calculated and quantified in accordance with section 3.3 of ‘Site Layout Planning for daylight and sunlight, A guide to good practice’ (BRE, 2022 Edition).*



2.6.1 Applicant's Response to Item 6

The Response to this Item was prepared by GIA.

2.6.1.1 Item 6(a) - Internal Daylight, Sunlight and Overshadowing Report

There are minor typos in the **second and third paragraph of Section 5.2** of the *Internal Daylight, Sunlight and Overshadowing Report* prepared by GIA. However, the conclusions remain accurate, and we note the relevant figures provided in the Executive Summary (Section 1) in the previous version of the Report (dated 6 September 2024) were correct.

An updated version of this Report is enclosed, dated 25 April 2025. The amended figures and a response are provided below:

*"The results show that 2380 out of the **2610** tested rooms (91%) meet or exceed the minimum daylight illuminance levels. The results can be found in section 6 of this report.*

*This figure considers the higher recommendation of 200 lux for multiuse rooms including a kitchen (LKDs). In addition, 116 combined Living/Kitchen/Dining rooms (or LKDs) would meet or exceed the 150 lux target for living rooms. Therefore, **2496** rooms (96%) can be considered to have good access to natural light, should the living room target be deemed acceptable." [Our emphasis.]*

The critical point to note is that the reference to 91% of tested rooms meeting or exceeding the minimum daylight illuminance levels is correct, as is the reference to 96% of tested rooms considered to have good access to natural light, should the living room target be deemed acceptable.

2.6.1.2 Item 6(b) – Daylight & Sunlight Impact on Neighbouring Properties Report

GIA have prepared the enclosed *Daylight & Sunlight Impact on Neighbouring Properties* Report, dated 29 April 2024, and the associated *Appendices*, also dated 29 April 2025.

This Report and the Appendices are updated to take account of the north facing windows at Block 2 of the Annville Residences based on drawings from DLR Reg. Ref. D05A/0133 taking account of the shape of the windows in question. The figures for daylight and sunlight impacts on this structure have been updated (see Sections 5.16 to 5.19). The VSC assessment is improved, whilst the No Sky Line impact is slightly increased. The overall conclusions of the Report are unchanged and support the proposed development:

"GIA's professional opinion is that on the balance and in context of the site, the impacts to the neighbouring properties are within the intention and application of the BRE guidelines and therefore should be considered acceptable in daylight and sunlight terms."

2.6.1.3 Item 6(c) – Daylight & Sunlight Overshadowing Report

In response to this item, GIA have prepared the enclosed *Daylight & Sunlight Overshadowing Report*, dated 8 April 2025, which takes account of the proposed Masterplan. The enclosed Report should be read in conjunction with the GIA Report entitled *Daylight and Sunlight Impact Report*, dated September 2024 (submitted in support of the Part 10 Planning Application), which *"demonstrated that neighbouring gardens would not experience adverse impacts as a result of the proposed development"*.

The enclosed Report assesses the overshadowing impact on neighbouring properties most likely to be affected by the proposed development.

The enclosed *Daylight & Sunlight Overshadowing Report* concludes:

"The analysis confirms that the proposed development will not adversely affect the gardens of neighbouring properties. Where minor reductions in sunlight occur, these are negligible, and the gardens will continue to receive very good levels of sunlight. All gardens currently receiving less than two hours of sunlight to 50% of their area will continue to retain the same levels in both the proposed and cumulative scenarios.

In conclusion, the tested gardens will not be materially affected by the proposed development. All properties assessed will either retain very good levels of sunlight or maintain their existing conditions."

2.7 Item 7 – Environmental Impact Assessment Report (EIAR)

Having regard to the foregoing, the applicant is requested to amend and update the EIAR by way of an addendum, as necessary.

2.7.1 Applicant's Response to Item 7

Tom Phillips + Associates in conjunction with the EIAR Team have considered this Response and prepared the enclosed:

- *Addendum to the Environmental Impact Assessment Report VOL 2 Main Report*, dated May 2025.
- *Addendum to the Environmental Impact Assessment Report VOL 2 Appendix*, dated May 2025.
- *Addendum to the Environmental Impact Assessment Report VOL 1 Non-Technical Summary*, dated May 2025.

These include updated Chapter and NTS Section in relation to Architectural Heritage, as well as Appendix 24.1 to capture the additional mitigation measures included in the Architectural Heritage Chapter.



2.8 Item 8 – Appropriate Assessment Screening Report and Natura Impact Statement

Having regard to the foregoing, the applicant is requested to amend and update the Appropriate Assessment Screening Report and Natura Impact Statement by way of an addendum, as necessary.

2.8.1 Applicant's Response to Item 8

Whilst the changes are minor in nature, Altemar Limited have prepared the enclosed *Appropriate Assessment Screening Report and Natura Impact Statement*, dated 29 April 2025, which take account of this Response to Further Information. The conclusions are unchanged.

2.9 Item 9 – Statement of Consistency

Having regard to the foregoing, the applicant is requested to amend and update the Statement of Consistency by way of an addendum, as necessary.

2.9.1 Applicant's Response to Item 9

Tom Phillips + Associates have prepared the enclosed *Statement of Consistency*, dated May 2025.

Whilst no significant design changes have been made to the proposed development through this Response, the *Statement of Consistency* is updated to reflect any changes to other documents enclosed in this Response to Further Information.

The overall conclusions of the Statement of Consistency have not altered.



4.0 CONCLUSION

As described in detail above and within the enclosed *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 reiterate 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 Response in due course. Please revert to the undersigned with any queries arising.

Yours sincerely,

Julie Costello

Julie Costello
Associate
Tom Phillips + Associate

Appendix A - Request for Further Information

2025 03 12 PR2002

Our Case Number: ABP-320912-24
Your Reference: Dún Laoghaire-Rathdown County Council

An Bord Pleanála

Tom Phillips and Associates
80 Harcourt Street
Dublin 2
D02 F449

Tom Phillips & Associates
Action: PR20-2902
Date Rec'd: 12 MAR 2025
TEAM JC / TW
Project Ref & planner

Date: 11 March 2025

Re: Proposed development of 934 no. residential units, across 9 blocks, and 4,380 sqm of non-residential uses. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompanies this application.
Located on the former Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14 and areas of Dundrum Road and St. Columbanus Road, Dublin 14.

Dear Sir / Madam,

I refer to the above mentioned proposed development which is before the Board for approval. Please be advised that the Board, in accordance with section 175(5)(a) of the Planning and Development Act, 2000, as amended, hereby requires you to furnish the following further information in relation to the effects on the environment of the proposed development:

1. Masterplan, phasing and protected structures

(a) The submitted hard copy of the Dundrum Central Masterplan is incomplete and only includes sections 1 to 9.7 (or part thereof). Notwithstanding the availability of the full document on the applicant's website, the applicant is requested to submit full copies of the Masterplan in compliance with Objective CMH1 of the Dundrum Local Area Plan 2023.

(b) Objective CMH1 of the Dundrum Local Area Plan 2023 requires that the Masterplan shall accord with the Guiding Principles and Objectives set out in the Site Development Framework for these lands.

One of the Guiding Principles is 'To require the suitable protection and reuse of the protected structures at an early phase in the redevelopment of the site.' Given that the Masterplan proposes to develop the protected structures in the final phase, subject to a future planning application, the applicant is requested to clarify how approval of the current application would

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

ensure the suitable protection and reuse of the protected structures at an early phase in the redevelopment of the overall lands.

In this regard, the applicant is invited to consider whether a condition could be applied to any approval of the current application that would allow completion of part of the development but postpone commencement of other parts until the suitable protection and reuse of the protected structures is achieved.

In responding to the above, the applicant is also requested to consider sections 6.7.2 (i) and 13.5.4 of the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage and the Gaeltacht) with regard to the phasing of conservation works in tandem with other development.

(c) While the application acknowledges that the proposed development is within the immediate setting and curtilage of the 'Hospital Building' (RPS No. 2073 (referred to as 'The Infirmary' in the application documents)), Chapter 17 of the Environmental Impact Assessment Report does not consider the potential impacts on this structure in any detail. The applicant is requested to submit an assessment of same.

2. Traffic and Transport

(a) Regarding the submitted Traffic and Transport Assessment, the applicant is requested to outline a clearer and more detailed explanation for the translation of 'Total Person Based Trip Rates' (Table 7.1) to 'Final External Vehicular Based Trip Generation' (Table 7.2). The applicant is requested to clarify:

- (i) The difference between the 'Driver' mode share (44%) in the Traffic and Transport Assessment, compared to the 40% mode share used in the Environmental Impact Assessment Report.
- (ii) Calculations showing how the 'driver' mode share was applied to the 'total trips' and the resultant total for 'vehicular trips'.
- (iii) Calculations showing how the estimated internal and external trip rates (as per section 7.3.10) were applied to the total number of vehicular trips, and the resultant estimated number of external vehicular trips.

(b) Notwithstanding the submitted response to the National Transport Authority observation, the applicant is requested to clarify the design rationale for the proposed two-lane vehicular exit onto Dundrum Road, particularly with reference to section 4.4.3 of the Design Manual for Urban Roads and Streets (Government of Ireland, 2019). In doing so, the applicant is requested to submit a design proposal for a one-lane exit option, along with a traffic impact assessment of its junction performance compared to the two-lane proposal.

3. Pedestrian and Cycle Facilities

(a) Notwithstanding the submitted response to the National Transport Authority observation, the applicant is requested to clarify the design of the proposed cycle route and priority arrangements for cyclists/pedestrian in accordance with the Cycle Design Manual (National Transport Authority, 2023). In this regard, the applicant is requested to clarify apparent differences in priority

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



arrangements in the 'Landscape Layout Overall Plan' (Drawing No. DSRM-ACM-00-ST-DR-L-1000) and the 'Road finishes, road markings and signage' drawing (No. DCD-BMD-00-00-DR-C-11001).

(b) Notwithstanding the submitted response to the third-party observations, the applicant is requested to clarify the design rationale for the proposed cycle/pedestrian link to Annville Park/Grove, including:

- (i) The deficiency in cycle/pedestrian facilities within Annville Park/Grove and the absence of detailed upgrading proposals for same.
- (ii) The transition into Annville Park/Grove and the sightlines available for motorists, pedestrians, and cyclists.
- (iii) Whether a detailed proposal for this link could be more appropriately submitted and delivered as part of a future application in accordance with Objective CMH3 of the Dundrum Local Area Plan 2023.

4. Dual Aspect Units

Having regard to points (a) to (c) below, the applicant is requested to clarify the correct number of Dual Aspect units and compliance with section 12.3.5.1 of the Dun Laoghaire-Rathdown County Development Plan 2022-2028:

- (a) Appendix B of the Housing Quality Assessment Report refers to a grand total of 936 units, 471 of which are stated to be Dual Aspect. However, only 934 units are proposed.
- (b) In Block 10, apartment units B10-00-19 and B10-00-20 are stated to be dual aspect, whereas the floor plans show that they are single aspect units.
- (c) In Block 7, the applicant is requested to clarify the classification of some units as dual aspect units having regard to the criteria outlined in section 12.3.5.1 of the Dun Laoghaire-Rathdown County Development Plan 2022-2028, particularly given the proximity of secondary aspects to adjoining walls/steps and the limited views afforded to these aspects. The applicant is requested to address this matter in respect of the following units:

B07-01-21, B07-02-21, B07-03-21, B07-04-21, B07-05-21, B07-06-12, B07-00-05, B07-00-03.

5. Proposed Residential Standards

Amenity Space

- (a) Objective CMH5 of the Dundrum Local Area Plan 2023 is to 'Require the provision of privacy buffers for ground floor residential units'. The applicant is requested to demonstrate compliance with same, including the submission of drawings showing the interface with adjoining public/communal areas.
- (b) The communal amenity space for Blocks 4 & 5, as stated in the Housing Quality Assessment Report, is less than that indicated on the 'Open Space Plan' (drawing no. DCD-02-SW-ZZZ-DR-RAU-AR-1004). The applicant is requested to clarify the correct figures.

Tel: 01 858 8100
Glaao Áitiúil: 1800 275 175
Facs: (01) 872 2684
Láithreán Gréasáin: www.pleanala.ie
Ríomhphost: bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Communal Facilities

- (c) Having regard to the significant scale of the proposed development, and notwithstanding the submitted 'Statement of Consistency' and the extent of proposed commercial/retail units and community facilities to be shared with the wider community, the applicant is requested to clarify proposals for dedicated amenities and facilities for future residents, particularly for the larger blocks. In responding to this point, the applicant is requested to address the following:
 - (i) In line with 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (Department of Housing Local Government and Heritage, 2023), Objective H3 of the Dundrum Local Area Plan encourages the provision of accessible communal rooms and/or facilities for the use of future residents in new residential apartment developments of 50+ units.
 - (ii) Section 12.3.5.3 of the Dun Laoghaire-Rathdown County Development Plan 2022-2028 outlines that apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements.
 - (iii) The potential for the provision of additional amenities and facilities in place of some units referenced in Point 4 'Dual Aspect Units' above.

6. Daylight and Sunlight

The applicant is requested to clarify the following and submit proposals accordingly:

- (a) Section 5.2 of the 'Internal Daylight, Sunlight and Overshadowing Report' appears to incorrectly refer to a total of 2,310 rooms assessed for daylight illuminance levels, and a total of 1,496 rooms that would meet or exceed the 150-lux target.
- (b) In the 'Daylight & Sunlight Impact on Neighbouring Properties Report', the stated total of 12 no. north-facing windows at Block 2 of Annville Residences (based on Dun Laoghaire Rathdown County Council Planning Portal drawings (P.A. Reg. Ref. D03A/0279)) would not appear to be consistent with that constructed on site. Assessments should be provided for existing window arrangements on site.
- (c) Notwithstanding the Transient Overshadowing Study submitted, the overshadowing impact on existing amenity areas has not been calculated and quantified in accordance with section 3.3 of 'Site Layout Planning for daylight and sunlight, A guide to good practice' (BRE, 2022 Edition).

7. Environmental Impact Assessment Report (EIAR)

Having regard to the foregoing, the applicant is requested to amend and update the EIAR by way of an addendum, as necessary.

8. Appropriate Assessment Screening Report and Natura Impact Statement

Having regard to the foregoing, the applicant is requested to amend and update the Appropriate Assessment Screening Report and Natura Impact Statement by way of an addendum, as necessary.

Tel: (01) 858 8100
Glaao Áitiúil: 1800 275 175
Facs: (01) 872 2684
Láithreán Gréasáin: www.pleanala.ie
Ríomhphost: bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



9. Statement of Consistency

Having regard to the foregoing, the applicant is requested to amend and update the Statement of Consistency by way of an addendum, as necessary.

Please also note that following its examination of any information lodged in response to this request for further information, the Board will then decide whether to invoke its powers under section 175(5)(b)(i) of the Planning and Development Act, 2000, as amended, to require you to publish newspaper notice of the furnishing of any further information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Board.

Your response to this letter should be received not later than **5.30 p.m. on the 11th September, 2025.**

In this regard, please submit 3 hard copies and one electronic copy of the above information.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Aisling Reilly
Executive Officer
Direct Line: 01-8737131

JA13

Teil (01) 858 8100
Glao Áitiúil 1800 275 175
Facs (01) 872 2684
Láithreán Gréasáin www.pleanala.ie
Ríomhphost bord@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902