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# **STATEMENT OF CONSISTENCY INCLUDING DUNDRUM LOCAL AREA PLAN CONSISTENCY STATEMENT**

## **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 F449

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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 (those 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, 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.

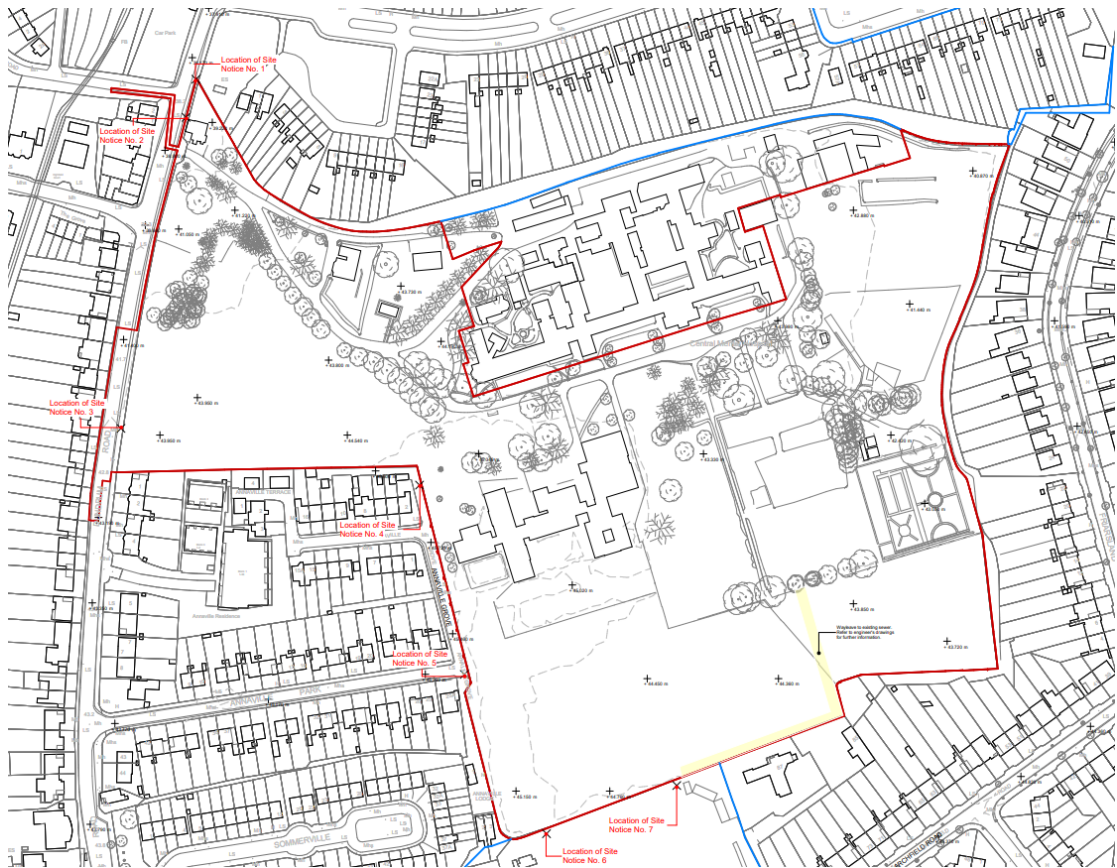
Given the former 'institutional' nature of the lands, the proposed development is subject to specific policy objectives pertaining to institutional lands. This includes (*inter alia*) a requirement to produce a Masterplan and retain the open character of the lands whilst providing a minimum of 25% open 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. 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 made 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. A separate planning application will be made in respect of the aforementioned adaptive re-use. 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 Legislative Context

In accordance with the Planning and Development Act, 2000 (as amended), Dún Laoghaire-Rathdown County Council (DLRCC), in partnership with The Land Development Agency (LDA), is seeking approval from An Bord Pleanála in respect of an Application made under Section 175 of the *Planning and Development Act, 2000 (as amended)* and Section 177AE of the *Planning and Development Act, 2000 (as amended)*.

## 1.2 Outline of This Report

This *Statement of Consistency and Dundrum LAP Consistency Statement* provides a description of the proposed development followed by a list of the various statutory and strategic policy documents considered. The Report demonstrates full consistency with National and Regional planning policies, the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*, the *Dundrum Local Area Plan 2023*, and the relevant Section 28 National Guidelines as required.

## 1.3 Policy Documents Considered

The following policy documents have informed this *Statement of Consistency*:

1. *National Planning Framework (Ireland 2040 – Our Plan)*
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*
3. *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)*
4. *Urban Design Manual: A Best Practice Guide (2009)*
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)*
6. *Childcare Facilities Guidelines (2001)*
7. *Part V of the Planning and Development Act 2000: Guidelines (2017)*
8. *Design Manual for Urban Roads and Streets (DMURS) (2019)*
9. *The Planning System and Flood Risk Management (2009)*
10. *Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*
11. *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*
12. *Department of the Arts, Heritage and the Gaeltacht ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011)*
13. *Housing for All – A New Housing Plan for Ireland (2021)*
14. *Climate Action Plan (2024)*
15. *Housing Delivery Action Plan 2022-2026*
16. *Dún Laoghaire-Rathdown County Council County Development Plan, 2022-2028*
17. *Dundrum Local Area Plan 2023*





## 2.0 EXECUTIVE SUMMARY

This *Statement of Consistency and Dundrum LAP Consistency Statement* demonstrates that the proposed residential and ancillary development at lands identified as the former Central Mental Hospital, Dundrum Road, Dublin 14 is consistent with the relevant policies pertaining to the site at national, regional, and local levels.

The proposed Part 10 Application is made by Dún Laoghaire Rathdown County Council (DLRCC), in partnership with the Land Development Agency (LDA). The proposed development is situated on a c. 9.7 ha site located at the former Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14, and lands at Dundrum Road and St Columbanus Road.

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 in consultation with the local authority and retain the open character of the lands whilst providing a minimum of 25% open space. The Application is also required to include a Masterplan under the provisions of the Dundrum LAP 2023 (DLAP).

In this regard, the redevelopment of the application site is supported by a comprehensive Masterplan which fully accounts for the provisions of the Institutional policy objectives attached to the lands. The Masterplan has been developed by a multidisciplinary project team, in consultation with Dún Laoghaire Rathdown County Council. The enclosed *Masterplan* document provides further details of this process including the key design parameters.

The proposed Part 10 Application forms part of a Masterplan for the wider site area of 11.39 ha. In addition to the development described in this Statement, the site wide Masterplan provides for the adaptive re-use of the main hospital building and associated open space. A separate planning application will be made in respect of the aforementioned adaptive re-use, once this Part 10 Application has been determined.

In summary, the proposed Part 10 Application will provide 934 no. residential units, 4,380 sq m of non-residential ‘other’ uses and 2.9 ha of public open space. The proposed residential units and ancillary non-residential floorspace will largely be accommodated in 9 no. blocks of development, ranging from 2 to 8 storeys in height (with Lower Ground Floors at Block 02 and 10, and Basement Levels at Blocks 3 and 4), arranged around new public open spaces and existing landscape features such as mature trees and the walled garden.

Based on a site area of 9.6 ha (excluding the area of the public roads outside the former CMH lands holding), the proposed development will provide a gross residential density of 97 units per hectare. Taking the net site area into account (based on a net site area of 6.5 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*), the proposed development will provide a net residential density of 146 units per hectare.<sup>1</sup>

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<sup>1</sup> Appendix B of the Compact Settlement Guidelines 2024 define Gross and Net Density as follows: “Gross density is a general measure of the number of residential units within a defined geographic area that includes all land. Net residential density is a more refined measure of the number of residential units within a defined geographic area that includes the areas to be developed for housing and ancillary uses only.”



From a land use perspective, the application site is zoned Objective A – *‘To provide residential development and improve residential amenity while protecting the existing residential amenities’* in the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*. The proposed residential development, together with the proposed non-residential lands which include retail, restaurant, café, medical and community facility provision, accord in full with the land use zoning objective for the site.

### 3.0 DESCRIPTION OF PROPOSAL

#### 3.1 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 3.1: Aerial image of the entire Central Mental Hospital site of approx. 11.39 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 11.39 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 application site along with the boundary wall, with the exception of the stretch behind the Main Hospital Building.



### 3.2 Wider Environment of Subject Site

In terms of surrounding development, the application 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 Annaville Grove, Annaville Park and Annaville 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 Annaville 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.



Figure 3.2: Aerial Imagery of the application site and surrounds; Application site boundary shown in red.

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).

### 3.3 Proposed Development Description

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 of 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.*

Refer also to the *Architectural Design Report* prepared by Reddy A+U for further details of the scheme.



## 4.0 NATIONAL AND REGIONAL POLICY COMPLIANCE

### 4.1 National Planning Framework (Ireland 2040 – Our Plan)

The *National Planning Framework* (NPF), published in February 2018, sets out a strategic development framework for the Country to 2040. The *National Planning Framework* is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

The Framework focuses on:

- Growing regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.

As a strategic development framework, the Plan sets the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

Under the heading of 'Compact Growth', the NPF is:

*"Targeting a greater proportion (40%) of future housing development to happen **within and close to existing built-up areas**. Making **better use of under-utilised land, including 'infill' and 'brownfield'** and **publicly owned sites** together with **higher housing and jobs densities, better serviced by existing facilities and public transport**". [Our emphasis.]*

A recurring theme in the Plan is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. The NPF estimates that Dublin City and suburbs will grow by c. 264,000 people in the period to 2040. Ireland 2040 targets a significant proportion of future urban development on infill/brownfield development sites within the built envelope of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.

The relevant National Policy Objectives (NPOs) which seek to implement policies surrounding housing delivery and compact growth are set out below (note: this is not an exhaustive list):

- **National Policy Objective 2a** – *A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.*
- **National Policy Objective 3b** – *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*
- **National Policy Objective 5** – *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

- **National Policy Objective 6** - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.
- **National Policy Objective 7** - Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:- **Dublin**; the four Cities of Cork, Limerick, Galway and Waterford; Strengthening Ireland's overall urban structure, ... Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities; Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs ... In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.
- **National Policy Objective 8** – To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.
- **National Policy Objective 11** - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.
- **National Policy Objective 28** - Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.
- **National Policy Objective 35** – Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

On 10<sup>th</sup> July 2024, the Draft Revision of the NPF was published for public consultation which will conclude in September 2024. The Draft Revision of the NPF focuses on the need to update the Framework to appropriately reflect changes to Government policy that have taken place since its initial publication in 2018, such as climate transition, regional development, demographics, digitalisation and investment and prioritisation.

The Draft Revision retains the original NPF focus on a more balanced distribution of growth across all of Ireland's regions.

Having taken into account the 2022 Census figures and the increased projected population, the Draft Revision also identifies a need for approximately 50,000 additional households per annum to 2040, an increase from the 30,000 per annum figure stated in the original NPF.

The Draft Revision of the NPF introduces 17 No. new NPO's to the NPF. NPO21 of the Draft Revision of the NPF which replaces NPO12 of the NPF, states:

*“The Government will support the LDA, in association with Local Authorities, to fulfil its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority.”*

The proposed development inherently complies with the overarching themes of the NPF by proposing a compact well-designed sustainable form of residential development on an underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development accords with the NPF’s aims to consolidate Dublin through the development of underutilised, brownfield sites.

The scale and locational characteristics of the subject site therefore provides an opportunity for a sustainable, higher residential development and the delivery of a significant contribution to meeting housing need.

The proposed development also complies with the Draft Revision of the NPF, by providing for additional housing in Dublin via a partnership development between DLRC and the LDA, which will provide for a significant number of homes on state owned lands in a mixed tenure development at an infill urban site in Dublin.

#### 4.2 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031* (RSES) is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Eastern & Midland Region.

The RSES includes a strategic plan for Dublin, the Metropolitan Area Strategic Plan (MASP). To achieve the Vision the MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area including Compact sustainable growth, including:

*“Compact sustainable growth and accelerated housing delivery – To promote **sustainable consolidated growth** of the Metropolitan Area, including **brownfield and infill** development, to achieve a **target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs**, and at least 30% in other settlements..”*  
[Our emphasis.]

And

*“Co-ordination and active land management – To **enhance co-ordination across local authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands**”.*

The RSES includes Policy RPO 5.5 which focuses on housing delivery. It states:

*“RPO 5.5: **Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs**, and the development of Key*

*Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.” [Our emphasis.]*

In our opinion, the proposed development is in full accordance with the objectives of the RSES realising the potential of brownfield lands in the consolidation of Dublin and its suburbs. The proposed development will provide a housing and tenure mix that will help to balance the existing pattern of predominantly private conventional family housing in the area.

#### 4.3 Sustainable and Compact Settlement Guidelines for Planning Authorities (2024)

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024* set national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the *Sustainable Residential Developments in Urban Areas Guidelines for Planning Authorities, 2009*.

The proposed development has had regard to the *Sustainable and Compact Settlements Guidelines for Planning Authorities*. There is a renewed focus in the Guidelines on the regeneration and consolidation of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

The Guidelines are set out in five Chapters as follows:

*Chapter 1 ‘Introduction and Context’* - describes the key characteristics of sustainable and compact growth and sets out a summary of Government policy in the areas of spatial planning and housing, climate and sustainable mobility that inform the policy approach.

*Chapter 2 ‘Implementation’* - addresses the interaction of these Guidelines with the plan making and development management processes and with other relevant Section 28 Guidelines.

*Chapter 3 ‘Settlement, Place and Density’* - sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.

The lands can be described as a ‘City – Urban Neighbourhoods’, which is described as:

*“The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations<sup>2</sup>, (iii) town centres designated in a statutory development plan, and (iv) lands*

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<sup>2</sup> “Described in Section 4.4.4 of the *Development Plans Guidelines for Planning Authorities 2022*. The *Dublin City Development Plan 2022-2028* details *Strategic Development and Regeneration Areas* in Chapter 13; and the *Cork City Development Plan 2022-2028* details *Strategic Consolidation and Regeneration Areas* in Chapter 10.”

*around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.”*

The lands are located in a compact medium density residential neighbourhood around the city centre that evolved to accommodate a greater range of land uses (i.e., Dundrum Centre, UCD, Dundrum Business Park), they are located in a strategic and sustainable development location (included in the Dundrum LAP area), and the site is less than 500m of the high capacity public transport node at Windy Arbour Luas and within 1km node at Dundrum Luas/Bus interchange (via the new opening to Rosemount Green to the south).

| <b>Table 3.8: Accessibility</b>  |  |
|--|--|
| <b>High Capacity Public Transport Node or Interchange</b>  |  |
| <ul style="list-style-type: none"> <li>• Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail<sup>11</sup>, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’<sup>12</sup> stop.</li> <li>• Highest densities should be applied at the node or interchange and decrease with distance.</li> <li>• ‘Planned public transport’ in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.</li> </ul> |  |

**Figure 4.1: Table 3.8 of the Compact Settlement Guidelines 2024.**

*Chapter 4 ‘Quality Design and Place Making’* - sets out policy and guidance in relation to quality design and placemaking to be applied in the plan making process and in the assessment of individual planning applications.

*Chapter 5 ‘Development Standards’* - sets out specific planning policy requirements (SPPRs) in relation to housing standards to be applied in support of greater innovation within the housing sector and to facilitate more compact forms of residential development.

The proposed development complies with the 5 Specific Planning Policy Requirements as outlined below:

#### SPPR 1 - Separation Distances

The SPPR states:

*“When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

*There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.”*

#### SPPR 2 - Minimum Private Open Space Standards for Houses

The SPPR sets out minimum private open space standards for houses. In this case there are no houses proposed, only apartments including duplex apartment units, and thus SPPR 2 does not apply.)

#### SPPR 3 - Car Parking

The SPPR sets out that:

*“In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) 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.”*

#### SPPR 4 - Cycle Parking and Storage

The SPPR states:

*“It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.*

*The following requirements for cycle parking and storage are recommended:*

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle*



*parking types including larger/heavier cargo and electric bikes and for individual lockers.*

- (ii) *Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”*

The proposed development complies with the Compact Settlement Guidelines. The net residential density is 146 units/ha (based on the methodology provided in Appendix B of the Guidelines), which is towards the middle of the range (50-250 dph net) indicated for urban neighbourhoods of Dublin (see the enclosed *Planning Report* for calculations). The site is less than 500m of the high capacity public transport node at Windy Arbour Luas and within 1km node at Dundrum Luas/Bus interchange (via the new opening to Rosemount Green to the south) and is located within a strategic and sustainable development location.

The windows of the proposed apartments all have a separation distance from windows of existing neighbouring buildings of more than 16m in accordance with SPPR1 (see Section 3.7 of the *Architectural Design Report*, which shows that the separation distances are 63m to the north; between 23m and 106m to the east; between 27m and 70m to the south; and between 21m and 38m to the east).

The scheme has been designed to ensure that the vast majority of the proposed units benefit from separation distances between proposed habitable rooms that accord with SPPR1, which states:

*“When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.”*

Section 3.7 of the enclosed *Architectural Design Report* identifies separation distances between units, a limited number of which are less than 16m. For example, between certain sections of Block 2 (4, 6, 7 and 9m); at the northern end of Block 4 (12-14m); between the northern end of Block 6 and southern edge of Block 8 (14m); between certain sections of Block 7 (8-14m); and between certain sections of Block 10 (9-13m). However, in these cases, where there are windows serving habitable rooms, these are not directly opposing each other but are staggered or at oblique angles, which provides suitable levels of privacy and prevents undue overlooking of habitable rooms and amenity spaces, as required by SPPR1.

As per SPPR3, and on the basis of the high quality pedestrian and cyclist facilities, provision of local services and the site’s location in proximity to existing services and facilities, car parking is reduced, with an average ratio of 0.5 space/unit for residential car parking (or 466 no. spaces, including visitor parking and car share spaces). Car parking for non-residential uses is

also proposed (58 no. spaces). This is assessed in the enclosed Transport and Traffic Assessment prepared by ILTP.

High quality cycle parking is provided across the site in compliance with SPPR 4. The cycle parking quantum for residential units exceeds the *Apartment Guidelines 2023* requirement of 1 space per bedroom, and 0.5 spaces per apartment for visitors (by providing 1,850 no. resident spaces and 488 no. visitor spaces). In terms of quality, the cycle parking meets the requirements of the *DLRCC Standards for Cycle Parking and associated Cycling Facilities for New Developments*. Please refer to the enclosed *Architectural Design Report* for further information.

#### 4.4 Urban Design Manual: A Best Practice Guide (2009)

It is understood that the intention is to prepare a replacement Urban Design Guidance document to reflect the Compact Settlement Guidelines 2024. However, that document has not been published to date and as *inter alia* the Development Plan refers to the *Urban Design Manual 2009*, it is assessed here and in Section 5.0 of the enclosed *Architectural Design Report* prepared by RAU.

We note that many of the urban design principles which informed the proposed development arise from the *Dundrum Local Area Plan 2023*, which includes an indicative layout and guiding principles for the development of the former CMH site.

The *Urban Design Manual* presents 12 no. criteria that should be used to facilitate assessment of planning applications and should therefore be used as a guide to steer best design practice for residential proposals. The figure below illustrates how the 12 no. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted: i.e. not moving onto matters of detail until the important structural decisions have been taken.

The 12 no. criteria are subdivided into three groups: Neighbourhood; Site; and Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process.



Figure 4.2: Urban Design Criteria. (Source: *Urban Design Manual*, 2009; p. 9)

In short, the proposal’s response to the various criteria set out by the Guidelines is summarised as follows. Please refer to the enclosed *Architectural Design Report* prepared by Reddy Urbanism + Architecture for further details.

**Context**

The application site is the former Central Mental Hospital, a forensic mental health facility which developed from the mid-nineteenth century onwards, beginning with the construction of the extant asylum building which dates from the late 1840s. The Central Mental Hospital has recently relocated from this site to the new National Forensic Mental Health Service (NFMHS) facility at Portrane in north County Dublin. The southwestern part of the site is in temporary accommodation erected by the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) under exempted development provisions under a licenced agreement with the OPW (landowners).

The proposed development has been designed to positively respond to the surrounding established residential developments and includes community spaces, commercial facilities, a childcare facility and significant publicly accessible open space across the site. We highlight that placemaking is fundamental to the success of larger residential developments and further highlight that this is an important aspect of the creation of a new neighbourhood at Dundrum.

Further to the public open space provision, a civic space is created within the centre of the development surrounded by retail / commercial units with new pedestrian connectivity proposed at the south, east and north.

The proposed apartment blocks are designed to heights facilitated by the *Dundrum Local Area Plan 2024* the Blocks are designed to ensure that the residential amenity of adjacent properties is maintained and respected. The proposed development is comprised of nine separate apartment blocks ranging from 2-8 storeys with primarily 2 storey apartment blocks arranged around the perimeter of the site. The development has been organised to maintain and enhance existing green spaces, maximising the publicly accessible open space, retention of trees, while providing communal amenity spaces at each block.

The buildings step up in height as they progress towards the centre of the development and the civic space. Buildings generally step down towards the boundaries, particularly where they directly adjoin existing residences. The surrounding area is predominantly comprised of 2-3 storey housing. Higher densities of living, along with an increased mixture of uses, will be essential in facilitating the development to grow as a 'distinctive urban centre' and to create a sense of place within Dundrum.

### **Connections**

A new pedestrian, cyclist and vehicular connection is proposed at Dundrum Road with sections of the existing boundary wall to be removed to open the site for physical and visual connection back to the site. The existing vehicular entrance will serve pedestrian and cyclists only, with access to emergency vehicles. Openings or interventions are proposed only at those locations which will facilitate inclusive permeability and encourage access. The proposed design aims to acknowledge the scale and materiality of the wall at Dundrum Road while offering new visual and physical connections to the hospital and landscape.

New openings in the boundary wall are also proposed at Annville Grove (west), Rosemount Green (south) and at Mulvey Park (north) which will allow the local community to access the significant open space and amenity within the application site.

The site is well served by existing public transport infrastructure, benefitting from its proximity to the LUAS Green line whose nearest station is located approximately 450m west of the site at Windy Arbour.

It is also less than a 10-minute walk from Dublin Bus Routes on Dundrum Road with services into Dublin city centre. Further to this, the site is less than a 15 minute walk from Dublin Bus Routes on Goatstown Road. Notably, the 142 and S4 Dublin Bus Routes provides services into UCD from Bird Avenue which is within a 10 minute walk of the site. The Dundrum Luas stop is located to the south. It is envisaged that local capacity and access will be further enhanced over the coming years under the BusConnects programme which is now being implemented.

### ***Inclusivity***

The proposed development provides a range of residential unit types, including one bedroom, two bedroom, three bedroom apartments uses, and two five-bed assisted living units, which will cater to a range of household types and tenures, to meet the needs and requirements of all sectors of the community. The development provides for 19% social units (social housing, and community homes (i.e., the two 5-bed assisted living units)), with the remaining units provided as affordable housing.

The design of the scheme also ensures that the residential elements are fully accessible for people with disabilities. All elements of the scheme fully comply with Part M of the *Building Regulations*. Accessible car parking provision is also provided in the development. High-quality, useable and inclusive public open space is provided for at strategic locations throughout the development. The proposed scheme creates a series of public open spaces and residents' communal amenity across the site.

The proposed public space provides a level surface linking the various commercial units with a variety of seating and landscaping provided creating an attractive streetscape. The surrounding residential buildings enclose the new public space whilst also allowing direct sunshine to cover portions of the square during varying parts of the day. Routes are provided to all of the open spaces within the site with finishes, lighting and slopes appropriate for users of all abilities. Seating is provided throughout the landscape to allow users to rest as they make their way through the site.

Throughout the development, apart from Block 6 which has a communal roof garden, residential shared amenity spaces are placed on the podium and where necessary are linked by a residents private staircase to the public space at lower level. The vast majority of apartments also provide significant visual amenity, either across the significant open space or across the proposed landscaped podiums.

A series of play areas are also proposed across the development to cater for users of all ages and of all abilities. The proposed apartment mix will expand the range of residential options in what is predominantly a suburban housing neighbourhood.

### ***Variety***

The former Central Mental Hospital site is currently inaccessible to the local community for security reasons as large parts of the site are currently unutilised. The proposal to open up the site with a new entrance onto Dundrum Road and new pedestrian and cyclist connections at the north, south and west provides a significant opportunity to offer a variety of spaces and activities for both the new residents, and the residents of the surrounding neighbourhoods.

The proposed development will establish the site as a major part of a neighbourhood centre for Dundrum/ Windy Arbour. A range of new retail and services will support the newly established community, which will in turn will contribute to the vitality of the area while complementing the existing uses in the area.

In a successful neighbourhood, a mixture of uses are required to facilitate the evolution of a vibrant and attractive urban environment. The facades onto the streets and the public space will look to provide connectivity between the inside and outside and contain a range of

functions that bring animation to the building frontages with passive surveillance of these spaces.

This is achieved in the proposed scheme in a number of ways:

- The proposed retail areas facing onto the plaza will provide activation of the public space and street frontages from early morning through to the late evening at these locations.
- The retail/ food and beverage facilities face onto the public square. This will allow these functions to make use of the square by providing outdoor seating areas that maximise the availability of direct sunlight during the day.
- The proposed café will activate the pedestrian/cyclist entrance at Dundrum Road and draw people into the site.
- The commercial spaces will be designed to be flexible in hosting a range of local retail or services such as shops, hairdressers, cafe's etc, that will support the local community.
- The community facilities proposed at Block 6 allow for a range of uses at various times of the day and are complemented by the residential units at ground and upper floors.
- Ground floor apartments will provide passive surveillance over both the residential amenity areas and public spaces through non-working hours of the day.

### ***Efficiency***

The proposal will connect to and make most efficient use of existing services and infrastructure. As stated above, the scheme will have a gross residential density of 97 units per hectare and net residential density of 146 No. units per hectare. This an efficient use of the underutilised urban lands and supports the NPF and RSES objectives to consolidate development in Dublin.

The community spaces within Block 6 has been designed to host a programme of community based events. For example, it serves as a venue for meetings, conferences and events for local resident's associations, schools and sports clubs amongst others. The activation of the public space and its pedestrianisation will assist in encouraging pedestrian movement through the development and connectivity with the surrounding areas.

This in turn has a positive impact on the vitality of the space and the perceived security of the public realm. Every opportunity has been taken to animate and open up the site to Dundrum Road. With the removal of sections of the wall, a greater sense of openness is provided with new views created from Dundrum Road into the landscape and back to the existing hospital. The development will offer an alternative to suburban housing the locality that can appeal to variety of future residents including families, students, professionals and those looking to downsize. The new development offers the opportunity to live in well managed apartments that benefit from excellent landscaped amenities yet provide the convenience of a neighbourhood centre on their doorstep.



The wider site currently consists of the main Hospital Building and a number of associated buildings and small temporary structures, with the general pattern of other development in the area being predominantly low density housing. It is proposed that the Application site should be designed to a significantly higher density to generate a strong urban form and make more efficient use of land. A higher density development will provide increased support for the economic viability of the local retail facilities and services while establishing a new neighbourhood centre with a distinct identity.

The site layout as developed provides a series of public and semi-private outdoor spaces with excellent solar access whilst still allowing buildings to step in size from the site perimeter towards the centre. The public and semi-private spaces are pedestrian dominated and this is achieved by placing most car parking under a podium. The pedestrian dominated landscape across the site will facilitate a large portion of the podium and the public space to be used as part of the Sustainable Urban Drainage strategy.

When reviewing the efficiency of the development on the site and its density we have analysed the design against the Guidelines for 'Urban Development and Building Heights'. We demonstrate compliance with this in Section 4.10 of this Report.

### ***Distinctiveness***

The proposed landscaping scheme will ensure that the proposal assimilates well into its surroundings thus creating a sense of place. Furthermore, a quality design approach has been adopted to ensure that the scheme integrates into the surrounding context. The site, due to its historical development, presents significant opportunity to provide unique and memorable public spaces. Proposed interventions to the boundary wall are at locations to 'invite' the public into the previously closed off spaces to experience the setting of the Main Hospital Building and the quality of the existing landscape.

The high-value landscape areas are maintained and buildings have been placed at areas designed to maintain and enhance the existing amenity. The plaza space at the centre of the site provides a contrast to the extensive green spaces as a space with hard landscaping complemented with planting and SUDs features.

The development has to create a strong sense of place and create a public space that works as a destination to attract pedestrians to the service, retail and commercial uses at the newly established neighbourhood centre. The public space also needs to be a place that provides opportunities for socialising and a place for people to meet, whilst respecting residential amenity and privacy.

### ***Layout***

The proposed design sets out to prioritise the pedestrian and cyclist above the private car as a primary concept. A bicycle/pedestrian route has been proposed from the boundary at Mulvey Park to the boundary at Rosemount Green with limited cross overs with vehicular traffic. Private vehicular traffic is kept to the edge of the development with appropriate traffic calming measures to reduce speeds.

Every opportunity has been taken to make all public street frontages active with 'own-door' residences or retail spaces provided at the majority building frontages. Access to podium car

parks and ESB substations have been placed at locations chosen to mitigate impact to the streetscape.

The natural slope/topography of the site has been used to advantage in the design of the car parking facilities by placing them under a podium level.

A number of options were explored for the orientation of the residential buildings on the site in order to define a hierarchy of spaces that can have a variety of different functions for residential amenity whilst also allowing good solar access and providing passive surveillance over all spaces.

### ***Public Realm***

The public space and the shared amenity spaces for the residents provide a variety of spaces that are planned and designed to host a diversity of activities. The public space is sized to serve an amount of services and retail uses suitable for a Neighbourhood Centre. The residential buildings will also bring additional life and animation to the site, increasing the footfall into and around the public space.

The sequential views produced of the public spaces within the site demonstrate the scale and functionality of each space plus the linkages between spaces and the passive surveillance over each space from the residential apartments. There is a clear definition between the public realm at ground level and the residents' communal space at podium level, or to the rear of Blocks 8 and 9.

Access control will be used to control who can access the podium using the steps up from the public space. Podium level apartment terraces looking onto the residents' communal space will be provided with a planted buffer zone to distinguish the different ownership.

The residents communal space benefits from excellent passive supervision from apartments at all locations. All of the children's play areas will also benefit from this passive supervision at all times. The public space and the surrounding streets also benefit from excellent passive supervision.

### ***Adaptability***

Residential apartments offer less physical adaptability compared to individual houses. For instance, a house can facilitate future modifications including extensions and attic conversions. Dublin is experiencing population growth coupled with a change in the preferences and structure of households and their size. In 2022, the average household size in Dublin City was 2.48 persons per household, compared to 3.13 in 1986, which suggests a trend towards smaller household size. With this in mind, apartments should still offer some flexibility to adaptation to future trends.

In terms of physical adaptability, apartment buildings are traditionally concrete column and slab construction, this allows all walls to be of lightweight construction and non-load bearing. This offers the opportunity to be able to modify apartments layouts if required or merge/split apartments at a future point in time if circumstances dictate. For example, two bedroom units



could be converted to 2 no. studio units. Notwithstanding this, the current provision of one, two and three bedroom apartments will cater for a range of users and over half of these apartments exceed the minimum standard areas by at least 10%.

In terms of dealing with climate change, the residential buildings are designed to NZEB standards. Apartments will utilise air-source heat pump technology to ensure the apartments can be heated as efficiently as possible without producing unnecessary emissions which themselves would contribute to climate change. In addition to the heat pumps, PV panels will be utilised to offset the energy demand with renewable energy.

### **Privacy & Amenity**

The quantity of residential communal amenity space meets the requirements of the standards as set out in Appendix 1 of the *Sustainable Urban Housing Design Standards for New Apartments*. External communal amenity space has been provided at podium level, or surface and to the rear of Blocks 8 and 9, and in the case of Block 6 at roof terrace, which is, naturally, raised above the public space, providing clear separation between public and semi-private spaces. In this regard, the Daylight and Sunlight report (Section 5.1) positively states the following:

*“Overall, the proposed development provides a variety of amenity spaces with different degrees of excellent sunlight and shading. The design has also ensured that occupants of all residential blocks will have access to well sunlit outdoor spaces throughout the year.”*

Further to this, all apartments have access to their own private balconies or terraces in accordance with the minimum requirements referenced *Apartment Guidelines*.

As the site is located at a well-connected accessible location, where good street frontages will be required in order to create a strong public realm, a balance between these design requirements and the need to provide dual aspect apartments must be met. On this basis, we note that the proposed development exceeds the SPPR 4 requirement for schemes in central and/ urban accessible locations of 33%. The overall scheme has a dual aspect ratio of 50%.

Further to this, the separation distances between the proposed buildings have been maximised, especially where the primary views and orientation of apartments face each other. We note that SPPR1 of the *Compact Settlement Guidelines 2024* now provides national policy relating to separation distances and the relevant figure is 16m. Where apartments have secondary orientation with less than the 16m separation distance identified in the *Compact Settlement Guidelines 2024*, windows are located and sized to give privacy to users of rooms in these apartments. Where ground level apartments have terraces facing onto the shared residential amenity space then planting is provided to give a buffer zone between the private and semi-private amenity spaces. All apartments will be designed to meet Part E of the Technical Guidance Documents for acoustic sound transmission. All apartments are also designed to meet the storage requirements as set in Appendix 1 of the *Sustainable Urban Housing Design Standard for New Apartments, 2023* and importantly, all storage is contained within each individual apartment.

Some storage of recyclable materials is allowed for within each apartment, but regular transfer of materials will be required to centralised waste stores as sized by AWN, Waste Consultants for the development.

In terms of relationship with neighbouring existing development, all blocks have been positioned at appropriate distances from existing neighbouring properties and the external amenity spaces of those properties. The proposed buildings are also at reduced heights along the boundary of the site in order to respect the privacy of adjacent properties and transition in scale to the existing low density housing, and the boundary wall is retained where the proposed Blocks are positioned by the boundary, ensuring that there will be a visual and physical separation between the structures.

### ***Parking***

The proposed development aims to reduce the number of cars on site, prioritising the pedestrian and cyclist over the private vehicle.

The development proposes 524 no. car parking spaces in total located primarily under podium car parking within the blocks, with a relatively small proportion located at ground level / within the landscape.

Given the proximity of the site to public transport, it is proposed to provide less than the Development Plan standards for the residential uses, in line with the Government's *Compact Settlement Guidelines* and the *Sustainable Urban Housing Design Standard for New Apartments*.

A detailed breakdown and summary of the parking provision has been provided in the enclosed Traffic and Transport Assessment prepared by ILTP. It is submitted that the proposed provision is an appropriate balance between the Development Plan and national guidance for sustainable housing developments.

### ***Detailed Design***

The proposed development introduces a new building line along Dundrum Road, creating a new edge condition to the development. Within the site, variations of brick type, detailing and proportions supplemented by complementary materials allow the individual blocks to make reference to their character areas within the site, creating a distinct sense of identity at each building. The design of the public space is also highlighted as central to the design for the new neighbourhood centre.

A taking in charge drawing is enclosed, suggesting which areas of the site could be taken in charge by the local authority on completion of the project. The areas of public space that will be managed by the LDA allows an enhanced quality of materials to be used.

#### 4.5 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)

The *New Apartments Guidelines 2023* is an update to the guidelines issued in 2022. The document sets out a guidance and a number of SPPRs relating to the quality of proposed new apartments.

In the first instance, the Guidelines identify the types of locations that may be suitable for apartment development. The subject site falls into the ‘*central and/or accessible urban locations*’ which comprises sites that:

- “*Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;*
- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.”*

The locational characteristics of the application site broadly align with the ‘*Central and/or Urban Accessible Location*’ criteria. The defining locational characteristics of the subject site include its proximity to Dundrum Town Centre (c. 1,600m), a significant employment location, and high-capacity urban public transport stops, including high-frequency urban bus service and the Luas line. The delivery of higher density apartment development at the application site is therefore considered to be appropriate.

As existing, the application site is located approximately 1,600 m from Dundrum Town Centre, a significant employment location. Dundrum Business Park, a large employment location, is also approximately 210 metres to the north of the site. There are also a number of schools in close proximity, namely, Our Lady’s National School (c. 300m), Jesus and Mary College, Our Lady’s Grove and Our Lady’s Grove Primary School (c. 700m, based on improved permeability via Rosemount Green) and Goatstown Educate Together Secondary School (c. 450m, based on improved permeability via Rosemount Green), and Goatstown Educate Together National School (at the former Notre Dame school site, c.1km to the south, which is proposed to be relocated permanently to the same site as the Goatstown ETSS) which jointly would employ a notable number of people within the County.

With the proposed development in place, which includes a number of new pedestrian and cyclist access points, the distance to Dundrum Town Centre will reduce to c. 1,000 metres.

The application site is located approximately 450 metres from Windy Harbour Luas Stop which provides direct access into both Dublin city centre and Dundrum Town Centre, albeit just one stop to the south and Sandyford Business District.

It is also less than 1km to Dublin Bus Routes at Bird Avenue, (with the S4 and S6 providing links UCD, Blackrock, Liffey Valley and Tallaght) and approximately 1km to Dublin Bus Routes at Dundrum and Taney Road (with the 74 and L25 providing links to Marly Park, Coombe Hospital, Eden Quay and Dun Laoghaire).



Notably, the S4 Dublin Bus Route provides services into UCD from Bird Avenue which is within a 10 minute walk of the site.

As part of the BusConnects programme, it is proposed to further enhance the number of bus services in the area, particularly at the Dundrum Luas Interchange c. 1km to the south.

The Guidelines also provide apartment design standards in the form of SPPRs relating to the following, which informed the County Development Plan:

| Specific Planning Policy Requirement  | Analysis  |
|---|---|
| <p><b>SPPR1</b></p> <p>Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</p>  | <p>The proposed mix of units comprises 342 no. 1-bed units (37%) and 592 no. 2-bed and 2+bed units (63%). There are no studios in the scheme.</p> <p>The assessment of unit mix in the context of the HNDA is provided in Section 5.2.30 of this Report. In brief, there is a requirement to provide 3 bed units in developments over 50 units, however the Development Plan also states “<i>Council Part 8 or Part 10 residential schemes may propose a different mix having regard to the specific needs of the Council Housing Department.</i>” (DLR CDP, Section 12.3.3.1.) This scheme is a Part 10 residential scheme that has regard to the specific needs of the Council Housing Department. The scheme is consistent with SPPR1.</p> |
| <p><b>SPPR2</b></p> <p>For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: • Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units; • Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th; • For schemes of 50 or more units, SPPR 1 shall apply to the entire development; All standards set out in this guidance shall generally apply to building refurbishment</p> | <p>SPPR1 applies to the scheme, not SPPR2.</p>  |





|   |  |
|---|--|
| <p>schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.</p>  |  |
| <p><b>SPPR3</b></p> <p>Minimum Apartment Floor Areas:</p> <ul style="list-style-type: none"> <li>• Studio apartment (1 person) 37 sq.m</li> <li>• 1-bedroom apartment (2 persons) 45 sq.m</li> <li>• 2-bedroom apartment (4 persons) 73 sq.m</li> <li>• 3-bedroom apartment (5 persons) 90 sq.m</li> </ul>  | <p>All apartments exceed the minimum floor areas detailed in SPPR3, more than 50% of the apartments are more than 10% greater than the minimum floor area. Refer to the enclosed <i>Housing Quality Assessment Report</i> for further information. The scheme is thus consistent with SPPR3.</p> |
| <p><b>SPPR4</b></p> <p>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <ol style="list-style-type: none"> <li>(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.</li> <li>(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.</li> <li>(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</li> </ol> | <p>Some 50% of the apartments are dual aspect, which is consistent with SPPR4. Refer to the enclosed <i>Housing Quality Assessment Report</i> for further information.</p>   |
| <p><b>SPPR5</b></p> <p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up</p>  | <p>All ground level apartments achieve at least 2.7m floor to ceiling height. The floor to ceiling height is generally greater than 2.7m across the scheme, particularly where residential units are adjacent to non-residential uses. Thus, the scheme is consistent with SPPR5.</p>            |



|   |  |
|---|--|
| to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.  |  |
| <b>SPPR6</b>  |  |
| A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations. | The floor plans have been designed to have no more than 12 units per core. Cores are generally placed in the middle of the courtyard blocks with limited travel distances to each of the residential units. The scheme is consistent with SPPR6. |
| <b>SPPR7</b>  |  |
| There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process.                     | SPPR7 does not apply to the scheme as no co-living units are proposed.   |

The Guidelines also provide design standards in respect of:

- Internal space standards, including storage spaces;
- Amenity spaces including balconies and patios; and
- Room dimensions.

The enclosed *Housing Quality Assessment Report* prepared by Reddy Architecture details these design standard as they apply for each type of apartment unit and demonstrates the scheme is consistent with these design standards.

In conclusion, we confirm that the proposed development complies in full with the SPPR's and the various numerical standards contained within the Apartment Guidelines. Refer to the *Housing Quality Assessment Report (HQA)*.

#### 4.6 Childcare Facilities Guidelines (2001)

The *Childcare Facilities Guidelines (2001)*, generally recommend the provision of childcare facilities for residential development with 75 No. units or more, having regard to the existing geographical distribution of such facilities in the area and the emerging demographic profile of the area.

The *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)* note that 1-bed or studio type units should not generally be considered to contribute to a requirement for childcare provision, and subject to location this may also apply in part or whole, to units with two or more bedrooms.

In this case, a residential development of 934 No. units is proposed; 492 No. of those units are two bed/4 person units or three bed units (i.e., this number excludes the one beds; two bed/3 person units, and 5-bed community homes). The proposed development includes a childcare facility 716 sq m, facilitating 132 no. childcare places.

The enclosed *Social Infrastructure Audit*, which has regard to the capacity within the existing local childcare network, notes that the potential childcare uptake of the proposal is likely to be only 132 no. places, which is provided for in the proposed childcare facility. Refer to Section 4 of the *Social Infrastructure Audit* for further details, which also identifies capacity in the surrounding childcare facilities.

We therefore confirm that the scale of the proposed childcare facility is adequate for the proposed development, having regard to the findings of the *Social Infrastructure Audit*.

#### 4.7 Part V of the Planning and Development Act 2000: Guidelines (2017)

This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 *Guidelines*, which states:

*“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”* (Source: Part V of the *Planning and Development Act 2000: Guidelines (2017)*, p. 10.)

The proposed development is a Part 10 Application as DLRCC is the Applicant in partnership with the LDA. The entire scheme is an affordable and social housing development.

Of the 934 no. units proposed, some 181 no. units (or 19%) are intended as Social Housing units (179 no.) and Assisted Living/Community Homes (2 no.).

The remaining units will comprise Right Size for Sale units (52 no.); Affordable for Sale (122 No.); and Cost Rental units (579 no.) to be managed by the LDA.

The proposed social units (social housing and community homes), and related schedule are identified in the Application documentation. Whilst, Part V does not apply to local authority own development, this provision exceeds the requirements of Part V of *the Planning and Development Act 2000* (as amended).

#### 4.8 Design Manual for Urban Roads and Streets (DMURS) (2019)

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys.

The Manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

ILTP Consulting prepared the enclosed *DMURS Compatibility Statement* which confirms that the proposed development is consistent with the principles and guidance of DMURS.

#### 4.9 The Planning System and Flood Risk Management (2009)

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published *The Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009). These Guidelines introduce the principle of a risk-based sequential approach to managing flood risk.

Barrett Mahony Consulting Engineers have prepared the enclosed *Site Specific Flood Risk Assessment* (SSFRA), in accordance with the requirements of the Guidelines. This Assessment concludes the developed site is shown not to be at a significant risk from flooding and to not create a significant risk to adjoining areas or downstream. Therefore, the development is deemed acceptable from a flood risk assessment perspective. Please refer to the enclosed Assessment for further information.

#### 4.10 Urban Development and Building Heights: Guidelines for Planning Authorities (2018)

The *Urban Development and Building Heights: Guidelines for Planning Authorities* were published on foot of the *National Planning Framework*. The aim of the *Guidelines* is to ensure that height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built-up areas.

SPPR1 of the Building Height Guidelines states:

*“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.”*

The subject lands are located within the boundary of the *Dundrum Local Area Plan, 2023* (DLAP), which had regard to the Development Plan (2022-2028) and these Building Height Guidelines, 2018.

##### **Context Provided by the DLAP**

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.”

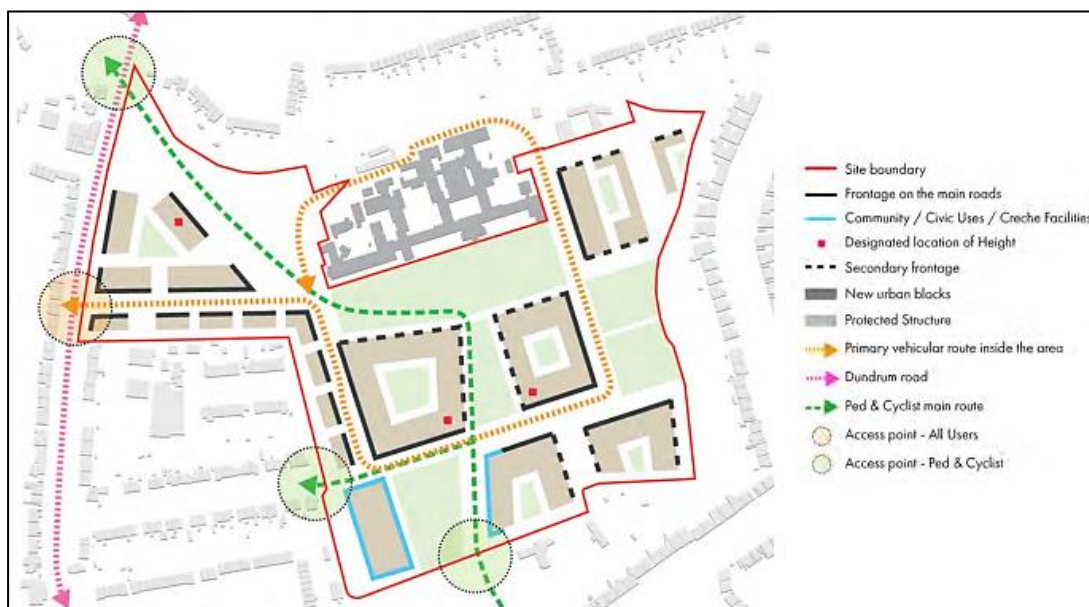


Figure 4.3: Extract from Figure 2.18 of the *Dundrum LAP 2023* showing the indicative urban form for the CMH site.

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.”*

The proposed development provides for heights between 2 and 8 storeys. The only 8 storey element is at the western side of Block 3, which is centrally located (i.e. at one of the “centrally located blocks which run north south”). 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. Thus, the proposed development is considered consistent with the height guidance provided in the DLAP.

Section 3.0 of the Height Guidelines contains **Policy SPPR 3** which states:

*“It is a specific planning policy requirement that where;*

- (A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above; and*  
*2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

*then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise...”*

The criteria referred to by Policy SPPR 3 is contained in Section 3.2 of the Building Height Guidelines. It sets out a number of criteria which, in line with SPPR 3, should be satisfied in terms of proposals for greater height. The criteria are set out in the table below:



**Table 4.1: Applicant’s Response to the criteria set out in Section 3.2 in line with Policy SPPR3. (*Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*).**

| Development Management Criteria – Building Height |   |  |
|---|---|--|
| Scale   | Criteria  | Response   |
| City / Town                                       | The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. | <p>The subject site is located approx. 450 meters (less than 10 minute walk) from Luas Green Line Windy Arbour with services at 3 to 5 minute intervals during peak hours. As well as providing a direct route into Dublin city centre, the Luas provides a direct route into Dundrum Town Centre, albeit just one stop to the south.</p> <p>It is also less than 1km to Dublin Bus Routes at Bird Avenue, (with the S4 and S6 providing links UCD, Blackrock, Liffey Valley and Tallaght) and approximately 1km to Dublin Bus Routes at Dundrum and Taney Road (with the 74 and L25 providing links to Marly Park, Coombe Hospital, Eden Quay and Dun Laoghaire).</p> <p>Notably, the S4 Dublin Bus Route provides services into UCD from Bird Avenue which is within a 10 minute walk of the site.</p> <p>We therefore conclude that the subject site is well connected by public transport that provides frequent services to key employment and educational destinations, as well as providing access to surrounding social infrastructure. The public transport options in close proximity connect the site to a wide range of key destinations.</p> <p>In terms of capacity, we note that the public transport that serves the site, namely the Luas and Dublin Bus routes, are high-capacity modes of public transport. The Traffic and Transportation Assessment, prepared by ILTP, provides an assessment of capacity and frequency to demonstrate this. This includes results of site surveys undertaken to determine capacity and frequencies and information known in respect of Luas/ bus capacity.</p> <p>The TTA concludes that the city bound Luas (in the AM peak hour (8.00-9.00) has a theoretical capacity of 8,160 persons per direction per hour, or 6,606 persons per direction per hour if using the assumed operational capacity. This is based upon a Luas capacity of 408 persons and a frequency of 3 min intervals.</p> <p>In this regard, the TTA also concludes that recent upgrades to 55m trams are now in operation. The survey result contained within the TTA are based upon the new capacity.</p> |





| Development Management Criteria – Building Height |  |   |
|---|--|---|
| Scale   | Criteria   | Response  |
|   |  | <p>In terms of the bus services that serve the site, an assessment of capacity and frequency determined that there is a total capacity of 1,710 persons in the AM peak hour. This is based on an operational capacity of 90 passengers per bus.</p> <p>The TTA further notes that capacity will be further increased by 25% over the coming years due to BusConnects.</p> <p>We conclude, having regard to existing public transport, that the site is served by high capacity and frequency public transport. Refer to the TTA for full details (Sections 3, 4 and 8).</p>   |
|   | <p>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</p> | <p>The proposed development includes a series of new buildings, planned in a Masterplan context across 9.6 ha of the 11.39ha former Central Mental Hospital site, ranging in height from 2-8 storeys. The prevailing height of the subject proposal is predominantly 2-6 storeys. The design strategy locates lower heights around the edge of the site (2 storeys) in closest proximity to existing residential properties in order to minimise potential impacts on the residential amenities of these properties in relation to overlooking, daylight and sunlight impact, overshadowing and overbearing, with greater heights located towards the centre of the site. The topography of the site has also been used, where possible, to minimise visual impact yet deliver buildings to an appropriate height and scale. It is considered that this approach successfully integrates the new development into the area and whilst clearly comprising a new and higher density form of development than the prevailing two storey housing, it will not give rise to significant amenity or visual impacts as evidenced by the enclosed Townscape/ Landscape and Visual Impact Assessment (chapter 14 of the EIAR), prepared by Macroworks and Daylight, Sunlight and Overshadowing Assessments undertaken by GIA. This assessment considers the visual impact of the development proposed when viewed from 17 no. viewpoints from a range of locations external to the site.</p> |
|   | <p>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new</p>   | <p>The proposed development will deliver a new mixed use urban quarter on a large former institutional infill site. The proposed development is designed around a series of new internal streets and spaces or character areas, which serve to create a diverse and animated development. The scheme will deliver a gross density of 97 units per ha (or 146 units per ha in net density terms) through the provision of a range of architectural styles and contrasting</p>  |



| Development Management Criteria – Building Height |  |   |
|---|--|---|
| Scale   | Criteria   | Response  |
|   | streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape. | <p>scales within the development. As noted within the TVIA contained at Chapter 14 of the EIAR, the townscape impact of the development is considered to be moderate/positive. An extract from the TVIA is provided below:</p> <p><i>“The campus style of the development allows for physical and visual permeability thorough the site where tree planting can be retained and supplemented. Furthermore, the architectural design style varies between buildings giving an organic / evolved feeling that helps to integrate it more readily with the surrounding context. It is considered that these design objectives are successful in integrating this development within its townscape setting particularly in a relative sense against the existing baseline of a ‘perceptual void.’”</i></p> <p>As noted above, the proposed development responds to the scale of adjoining development through the varied use of building heights (lower around the edges - 2 storeys) through the site and the creation of generous separation distances between the taller elements of the scheme and neighbouring properties. The relationship of new development to the Protected Structure complex on the site is assessed in detail within the application submission and ensures that the sensitive architectural context is respected. Refer to Chapter 17 of the EIAR for a full architectural heritage assessment of the proposed development in the context of the site’s heritage.</p> |
| <b>District / Neighbourhood / Street</b>          | The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape  | <p>The proposal is designed to maintain the site’s open character through the provision of significant public open space and to retain as much of the site’s valuable natural environment as possible including important features such as the walled garden and the mature trees on the site. The landscape strategy for the lands will enhance and complement the adjoining existing public open space (Rosemount Green) and promote the provision of pedestrian and cycle routes through the site. In addition, the site’s existing built environment is also incorporated into the proposed development through sensitive interventions and placement of buildings in the immediate setting of the Protected Structure complex, which will be adapted and re-used as an enterprise centre as part of the wider Masterplan proposal. Intervention to the site’s iconic boundary wall represents a balance between achieving increased permeability and connectivity into the surrounding area and a sensitive approach aimed at retaining the vast majority of an important heritage asset.</p> <p>In terms of improving permeability and connectivity, the site’s primary interface with the surrounding road network is onto Dundrum Road and proposes the part-</p>   |



| Development Management Criteria – Building Height |  |   |
|---|--|---|
| Scale   | Criteria   | Response  |
|   |  | removal of the boundary wall or lowering of the wall in this location in order to open up the site (heretofore fully enclosed) and facilitate public interaction between the development and the adjoining roadway. This also facilitates permeability through the site and provides a new urban edge and contemporary streetscape to the overall site.   |
|   | The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.   | <p>The subject development comprises a series of individual buildings all designed in a different architectural style of varying scale, form and height. There are no <i>'uninterrupted walls of building in the form of slab blocks'</i>.</p> <p>Within the site, the buildings are broken down in scale by introducing steps in the facades in both plan and elevation. Each building is designed to relate to its character area through scale, materiality and dwelling mix. A simple palette of materials, the use of different materials at Lower Ground and Ground Floors, and design details provide appropriate visual variety to the elevations and the massing of the buildings.</p> <p>The design also proposes to open up the existing wall onto Dundrum Road, providing relief from the existing road and creating new access routes into the site.</p>                                 |
|   | The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009). | <p>Regarding flood risk, the site was subject to a flood risk assessment in line with the requirements of <i>"The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)</i>, which concluded that the site will not be subject to flood risk due to it being in Flood Zone C and is therefore appropriate for residential development.</p> <p>The proposed development will deliver a series of significant new public open spaces that can be accessed by a range of thoroughfares primarily by pedestrians and cyclists. The creation of these spaces enables buildings predominantly ranging in height from 2 – 8 storeys to be established on the site. The framing of these significant public spaces by buildings in this height range provides an appropriate sense of scale and enclosure in what is a very significant 11.39 ha (overall) landholding.</p> |
|   | The proposal makes a positive contribution to the improvement of legibility through  | The proposed development, which will introduce a new residential neighbourhood together with commercial uses will be a new destination for the future occupiers of the development and the existing community. To ensure  |



| Development Management Criteria – Building Height |   |   |
|---|---|---|
| Scale   | Criteria  | Response  |
|   | the site or wider urban area within which the development is situated and integrates in a cohesive manner.  | <p>connectivity and accessibility between the proposed development and existing surrounding streets, the proposal includes a number of new pedestrian and cyclist access points which enable connection into the existing network.</p> <p>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.</p>  |
|   | The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.  | <p>The proposed development will deliver a good range of uses including residential, childcare facility, café, restaurant, retail, medical and community. These uses will all contribute to the range of services available to the existing area and future neighbourhood being created on site. In terms of dwelling typologies, the proposal will deliver a range of residential unit types that will serve a wide range of household types. The unit mix will include 1, 2 and 3 bedroom apartments including with duplex units and two 5-bed assisted living units. We also note that a number of units have been designed in accordance with Universal Design to cater for a range of household needs. This unit mix will ensure that a variety of unit types to complement the predominant two storey family housing that characterises the area will be provided in this development.</p>  |
| Site / Building                                   | The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. | <p>The development is designed to ensure that there will be no significant overshadowing or loss of daylight or sunlight to adjoining residential properties. Heights are modulated throughout the scheme to minimise impact on access to sunlight or daylight on adjoining dwellings. The enclosed <i>Daylight and Sunlight – Impact on Neighbouring Properties Report</i> which incorporates a <i>Transient Overshadowing Assessment</i>, both prepared by GIA, provides further details in this regard.</p> <p>Furthermore, the development has also been designed to maximise daylight and sunlight access to the proposed residential units and amenity spaces within the development. The enclosed <i>Daylight and Sunlight – Internal Daylight and Sunlight Report and Overshadowing Assessment</i>, prepared by GIA, provides further details of the overall positive performance of the proposed development in this regard.</p> |



| Development Management Criteria – Building Height |   |   |
|---|---|---|
| Scale   | Criteria  | Response  |
|   |   | <p>In summary the report states “we therefore conclude that the achieved levels of daylight and sunlight are overall excellent for a scheme of this nature. As such, we consider that the Proposed Development will provide future residents with very good daylight and sunlight amenity.”</p> <p>Refer to Section 1 for an <i>Executive Summary</i> of these results, Section 7 for detailed daylight and sunlight assessment and section 8 for the overshadowing assessment in the enclosed <i>Daylight and Sunlight – Internal Daylight and Sunlight Report and Overshadowing Assessment</i>, prepared by GIA.</p>  |
|   | <p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’</p>   | <p>The 2008 BRE Guidance has been superseded by the 2022 version, which has informed the enclosed impact assessments. As set out in detail in the enclosed Daylight and Sunlight reports, the proposed development is assessed having regard to the BRE ‘<i>Site Layout Planning for Daylight and Sunlight</i>’ 2022 including Appendix C and the UK National Annex (as referred to in Appendix C of the 2022 Guidance), which confirms that daylight and sunlight assessment undertaken accords in full with the methodology set out in the above referenced guidance.</p>   |
|   | <p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that</p> | <p>As noted above, the daylight, sunlight and overshadowing assessments demonstrate an excellent level of compliance with the target values set out in the 2022 Guidelines.</p> <p>We note that whilst a number of shortfalls are evident, these are in our opinion compensated by the overall quality of the scheme from a standard of accommodation and amenity perspective.</p> <p>The <i>Compact Settlement Guidelines, 2024</i>, acknowledge that daylight provision is only one of a number of considerations when considering the overall quality of the design and layout of a scheme and that any shortfalls should not automatically be a reason to refuse approval for a proposed development:</p> <p><i>“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</i></p> |



| Development Management Criteria – Building Height |   |  |
|---|---|--|
| Scale   | Criteria  | Response   |
|   | <p>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.</p> | <p><i>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”</i></p> <p>The BRE Guidelines 2022 also clearly state the guide: “is not mandatory and the guide should not be seen as an instrument of planning policy.” The guidance also acknowledges in its introduction that “Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...”</p> <p>Refer to Section 5 of the <i>Daylight and Sunlight Internal Daylight, Sunlight and Overshadowing Report</i> and Appendix A of this Report for further detail on compensatory measures applicable to apartments with shortfalls. These measures are in addition to the general positive characteristics of the proposed scheme that will benefit all future residents (including provision of substantial public open space (3.2ha of the overall Masterplan site, the majority of which is delivered through this Application); on site services including a community/sports facility 1,749 sq m, retail units, café, medical centre; and the historic structures that add to the character of the scheme including boundary walls, gate lodge and walled garden.)</p> <p>Further to this, the proposed buildings within the development have been given careful consideration in terms of site planning and the arrangement of apartments in each building in order to maximise the number of dual aspect apartments (50% of the total).</p> <p>Furthermore, the proposed development has been designed in accordance with national and regional policy objectives pertaining to housing delivery and compact growth which require additional densities and identify increased building height as an important mechanism for achieving this. DLRCC and the LDA both have remits to deliver significant housing growth and contribute towards enabling an affordable housing sector in Ireland. In specific relation to the former Central Mental Hospital lands, in addition to the requirement for the delivery of a significant quantum of housing, the redevelopment of the lands, due to their former institutional use, is also required to retain the open character of the land and deliver at least 25% public open space. The balancing of these site specific policy requirements (including reference to the</p> |





| Development Management Criteria – Building Height  |  |   |
|--|--|---|
| Scale  | Criteria   | Response  |
|  |  | Dundrum LAP) has informed the proposed site layout, including the height, arrangement and density of the proposed buildings. In this respect, the proposed development successfully balances policy requirements and on the whole, provides an excellent standard of residential accommodation in an attractive setting for future occupiers as well as relating sensitively to the surrounding context.  |
| <b>Specific Assessments</b><br><br>(To support proposals at some or all of these scales, specific assessments may be required and these may include) | Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. | A detailed microclimate assessment has been undertaken and is contained at Chapter 15 of the EIAR. It concludes that safety and pedestrian comfort is maintained in accordance with the Lawson Comfort and Distress Criteria with the proposed development in place.<br><br>Refer to Chapter 15 of the EIAR for full details.   |
|  | In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.   | This planning application is supported by a full biodiversity assessment enclosed as Chapter 8 of the EIAR and a <i>Natura Impact Statement</i> .<br><br>The various assessments are supported by a full suite of ecology surveys including bat surveys and wintering birds.<br><br>The NIS concludes with the following:<br><br><i>“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.”</i><br><br>In terms of birds, three seasons of wintering bird surveys have taken place covering the 20/21, 21/22 and 23/24 seasons. Refer to Appendix 8.1 - 8.3 of the EIAR for the survey reports and full conclusions. In summary, no direct impacts to any of the SPAs within the zone of influence are expected, indirect effects on the SPAs are considered unlikely. It further concludes that while some disturbance impacts may occur to the SPI species (Black-headed gull) recorder, this would not be deemed to be of potential significance. |



| Development Management Criteria – Building Height |  |   |
|---|--|---|
| Scale   | Criteria   | Response  |
|   |  | <p>A full assessment has also been undertaken in respect of bats. Refer to Appendix 8.6 of the EIAR. In summary:</p> <p><i>“Consultation within the project team has taken place in relation to the potential impact of lighting on foraging. The proposed lighting has been modified to allow for foraging activity to continue on site. A derogation licence will be required for the felling of two trees associated with the bat roosts on site. A derogation licence will be required for the lighting disturbance of a bat roost on site. The presence of new buildings on site will alter the local environment but, foraging will continue on site. A pre-construction survey of buildings and trees will be carried out. The impact is deemed to be low adverse/negative/long term/not significant. A derogation licence has been granted for the proposed development.”</i></p> <p>In terms of bats, we further note that the project ecologist liaised closely with the M+E engineers to ensure the proposal of bat sensitive lighting across the scheme.</p> <p>In terms of collisions, given that the maximum height of the proposed development is 8 storeys and the limited bird activity recorded in respect of the site, it is not considered that bird collisions are likely to present as an issue in this scenario.</p> |
|   | An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. | We note that the application site is currently served by the EIR network which enters the site from Dundrum Road. A Virgin Media network extends around the perimeter wall. The EIAR in support of this planning application has regard to the impact of the proposed development upon the existing telecommunication network. It concludes that the proposed development would have a neutral impact upon telecommunications in the surrounding area.  |
|   | An assessment that the proposal maintains safe air navigation.   | Due to the distance of the site from the airport of 13km, typical flight paths, and the medium rise scale of the tallest building within the scheme, on the basis of professional judgement, it is not considered that the proposed development will give rise to any impacts in this regard.   |
|   | An urban design statement including, as appropriate, impact on the historic built environment.                             | This application is accompanied by a detailed Masterplan, which sets out the urban design principles underpinning the overall design approach to the site’s re-development. It is also supported by an <i>Architectural Design Report</i> which details the proposal in design terms and sets out the design rationale for the development. In addition, the application includes heritage assessments (EIAR Chapter 17) that address the impact of new development on the Protected Structures and wider historic built form and the manner in which the historic structures and landscape have informed the wider design approach.  |



| Development Management Criteria – Building Height |  |  |
|---|--|--|
| Scale   | Criteria   | Response   |
|   | Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate. | <p>The planning application is accompanied by an Environmental Impact Assessment Report (EIAR), which includes a Biodiversity chapter addressing the potential impacts of new development on the ecology of the site. The application also includes a Natura Impact Statement (to facilitate a Stage 2 Appropriate Assessment).</p> <p>These assessments enable the robust assessment of the proposed development by An Bord Pleanála upon the receiving environment and are supported by extensive survey work.</p> |

The proposed development, including 9 No. blocks ranging between 2 and 8 storeys. The Application is accompanied by a full suite of site-specific assessments. The proposed development provides for an appropriate residential density and has been designed to provide a good level of residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.

Furthermore, the heights proposed in the proposed development are supported by the Dundrum LAP, which provides for heights of 3 to 7 storeys at the former CMH site, with two areas identified in the centre of the site where “*elements in excess of 7 storeys may be provided*” the proposed development provides for an 8<sup>th</sup> storey on the western side of Block 3, which is consistent with one of the locations indicated. This is examined in more detail in Section 5.3 below.

Referring back to the aforementioned guidelines in relation to sustainable urban development, compact settlements and apartment development, there is a suite of national planning policy that requires the delivery of higher density development to achieve national objectives surrounding housing delivery. In the absence of finite land supply, increased building height is an essential component of achieving the required higher densities whilst maintaining a high standard of living accommodation and achieving sustainable communities.

The proposed development is consistent with the Building Height Guidelines, 2018.

#### 4.11 Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)

The *Appropriate Assessment Guidance* was published to guide compliance with the Birds Directive, 1979 and the Habitats Directive, 1992 as implemented in Irish law by Part XAB of the *Planning and Development Act 2000 (as amended)*

Altemar Ltd. has undertaken an Appropriate Assessment Screening and Natura Impact Statement (NIS) for the proposed development. It outlines the information required for the competent authority to screen for appropriate assessment and to determine whether or not the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites’ conservation objectives, will adversely affect the integrity of the European site.



On the basis of the content of the enclosed report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

Drawing upon the conclusions of the NIS, it is highlighted that following the implementation of the mitigation measures outlined, no significant impacts are likely on Natura 2000 sites, alone or in combination with other plans and projects based on the implementation of mitigation measures.

#### 4.12 Department of the Arts, Heritage and the Gaeltacht 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011)

All development proposals potentially impacting on Protected Structures and places designated as Architectural Conservation Areas and candidate Architectural Conservation Areas shall have regard to the Department of the Arts, Heritage and the Gaeltacht 'Architectural Heritage Protection Guidelines for Planning Authorities' (2011).

We note that Chapter 17 'Architectural Heritage' of the Environmental Impact Assessment Report has been prepared in accordance with these Guidelines. The enclosed *Historic Landscape Statement of Significance and Impact Assessment* prepared by Alastair Coey Architects also addresses the proposed development in the context of these Guidelines. Refer to the *Historic Landscape Statement of Significance and Impact Assessment* and the chapter for full details.

After Mitigation Measures the Impacts are identified as Moderately Negative for the Main Hospital Building, Perimeter Wall and Historic Landscape; Slightly Negative for the C20 Airing Sheds; Negligible for the Farmstead and Walled Garden; Slightly Beneficial for the Chapel; and Significantly Beneficial for the Gate Lodge.

However, these impacts are to be considered in the context of the need for change of use at the site, as it has been underutilised since the CMH relocated to a modern premises:

*"In order to achieve the outcome of the Central Mental Hospital site having a viable and long-term future, some level of harm to heritage significance has been found to be necessary. New developments in proximity to the Main Hospital Building and in the Historic Landscape, comprising multi-storey apartment blocks and associated infrastructure, will make significant changes to their context. The Perimeter Wall, currently contiguous except for the main entrance, will by necessity have new openings formed for pedestrian and vehicular access.*

*However, no part of the proposals will result in the total loss of significance for a heritage asset. The principal and defining features of the site will remain, and in some cases be enhanced by the development.*

*It is the conclusion that, with suitable and targeted mitigation measures, the proposed development of will therefore result in less than substantial harm to the heritage assets that lie within and in close proximity to the application site."*

The *Architectural Heritage Protection Guidelines* advise that "on the whole, the best way to prolong the life of a protected structure is to keep it in active use, ideally in its original use." The use of the site and historic buildings for the Central Mental Hospital has discontinued at this location as the service relocated to modern purpose-built facility. Therefore, a new viable long term use of the buildings and site is required in order to ensure the ongoing active use and maintenance of the buildings and site.

The proposed development reflects the *Dundrum Local Area Plan 2024* by delivering much needed housing at this infill urban site in close proximity to high quality public transportation, by delivering significantly improved permeability through the site, and masterplanning for the active reuse of the historic buildings on site which will be delivered in a future application.

#### **4.13 Housing for All – A New Housing Plan for Ireland (2021)**

Housing for All is an action plan for housing up to 2030. The Plan is based around four key pathways:

- Supporting home ownership and increasing affordability;
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion;
- Increasing new housing supply; and
- Addressing vacancy and efficient use of existing stock

The Plan sets a target of delivering over 300,000 homes by 2030 including 90,000 social homes, 36,000 affordable purchase homes and 18,000 cost rental homes.

The proposed development will provide 934 no. homes comprising: 181 no. social housing units (which includes 2 no. Assisted Living/Community Homes Units); 52 no. Right Size for Sale units; 122 no. Affordable for Sale units; and 579 no. Cost Rental units. This fully aligns with and supports the government's aim to achieve a more sustainable housing system as set out in the Housing for All Plan.

#### **4.14 Climate Action Plan (2024)**

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan 2019. This Plan sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021.

Climate, sustainable development and energy efficiency considerations have been a key consideration of the proposed development throughout the design process, from inception. An *Energy & Sustainability Report* has been developed for the project, prepared by EDC and is enclosed with the planning application accordingly. The proposed development will comply

with residential [Building Regulations: Technical Guidance Document L 2022- Conservation of Fuel and Energy- Dwellings](#). (Part L 2022 (Dwellings)), and provides a carefully considered energy strategy. Please refer to the enclosed EDC *Energy & Sustainability Report* for further information.

## 5.0 LOCAL POLICY COMPLIANCE

### 5.1 Dún Laoghaire-Rathdown County Council Housing Delivery Action Plan 2022-2026

The DLR Housing Delivery Action Plan sets out details of both social and affordable housing delivery for the period 2022-2026, in line with targets set under Housing for All, and has been developed having regard to the National Planning Framework (NPF), the DLR County Development Plan 2022 – 2028, the DLR Traveller Accommodation Programme (TAP) 2019 – 2024, the DLR Strategic Plan for Housing Disabled People 2021–2026; and the Annual Social Housing Needs Assessment (SHNA).

The DLR Housing Delivery Action Plan notes that the delivery of social and affordable housing will come through a number of sources including DLR and Approved Housing Bodies (AHBs) and the Land Development Agency (LDA) build, turnkey developments, Part V and Local Infrastructure Housing Activation Fund (LIHAF) housing delivery.

Whilst the proposed development may not likely be delivered within the life of the 2022-2026 Housing Delivery Action Plan, the development will significantly benefit both social and affordable housing numbers in the next iteration of the Plan, by delivering 934 no. units.

### 5.2 Dún Laoghaire-Rathdown County Development Plan, 2022-2028

The County Development Plan 2022-2028 came into effect on the 21<sup>st</sup> April 2022 and is considered in detail below.

#### 5.2.1 Core Strategy of the Development Plan

The Core Strategy, which forms part of the *Development Plan* (contained within Chapter 2), sets out the medium-to-longer term quantitatively based strategy for the spatial development of the *Dún Laoghaire-Rathdown area*. In this regard, the *Plan* states that:

- *“The central focus of the Core Strategy is on residential development and in ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for the projected demand for new housing, over the lifetime of the Plan. As set out in Section 10(2A) of The Act, the Core Strategy shall inter alia:*
  - *Provide relevant information to demonstrate that the Development Plan and the Housing Strategy are consistent with the NPF, RSES and with specific planning policy requirements (SPPRs) specified in Section 28 Guidelines.*





- *Take account of any policies of the Minister in relation to national and regional population targets.*
- *Provide details in respect of the area in the Development Plan already zoned for residential and mixed-use zonings and the proposed number of housing units to be included in the area.*
- *Provide details in respect of the area in the Development Plan proposed to be zoned for residential use and mixed-use zonings and how the zoning proposals accord with national policy that development of land shall take place on a phased basis.*
- *Set out a settlement hierarchy for the area of the Development Plan.*
- *Provide relevant information to show that, in setting out objectives for retail development, the Planning Authority has had regard to any Section 28 Guidelines.”*

Furthermore, the Core Strategy examines the following factors: population growth trends, population projections for the Core Strategy, housing delivery, planning and construction activity, evaluation of housing demand, housing target for the Core Strategy, and Residential Development Capacity Audit.

As part of the Core strategy, it is an objective to prepare a HNDA analysis, as outlined in policy objective CS1:

*“It is a Policy Objective to accord with the Housing Strategy and Housing Needs Demand Assessment 2022—2028 and to carry out a regional HNDA post adoption of the Plan and to consider varying the Plan if required. (Consistent with NPO 37 of the NPF).”*

The Core Strategy Housing Target, as shown below, provides a housing target of 18,515 units for Dún Laoghaire-Rathdown for the period of 2020-2028.

**Table 5.1: Core Strategy Housing Target. (Source: Dún Laoghaire Rathdown County Development Plan 2022-2028)**

|  | <b>2016</b> | <b>Q1 2028 – RSES High Growth Scenario</b> |
|--|-------------|--|
| Population   | 218,000     | 256,125                                    |
| Increase in Population   | N/A         | 38,125                                     |
| Total Housing Stock  | 86,962      | 110,969                                    |
| Housing Target (2016 – Q1 2028)  | N/A         | 24,007                                     |
| Minus CSO Housing Completions (2017 – Q1 2021)<br>+ Estimated Completions Q2 2021 – Q1 2022) | N/A         | 5,492                                      |
| Housing Target (Q2 2022 – Q1 2028)   | N/A         | 18,515                                     |

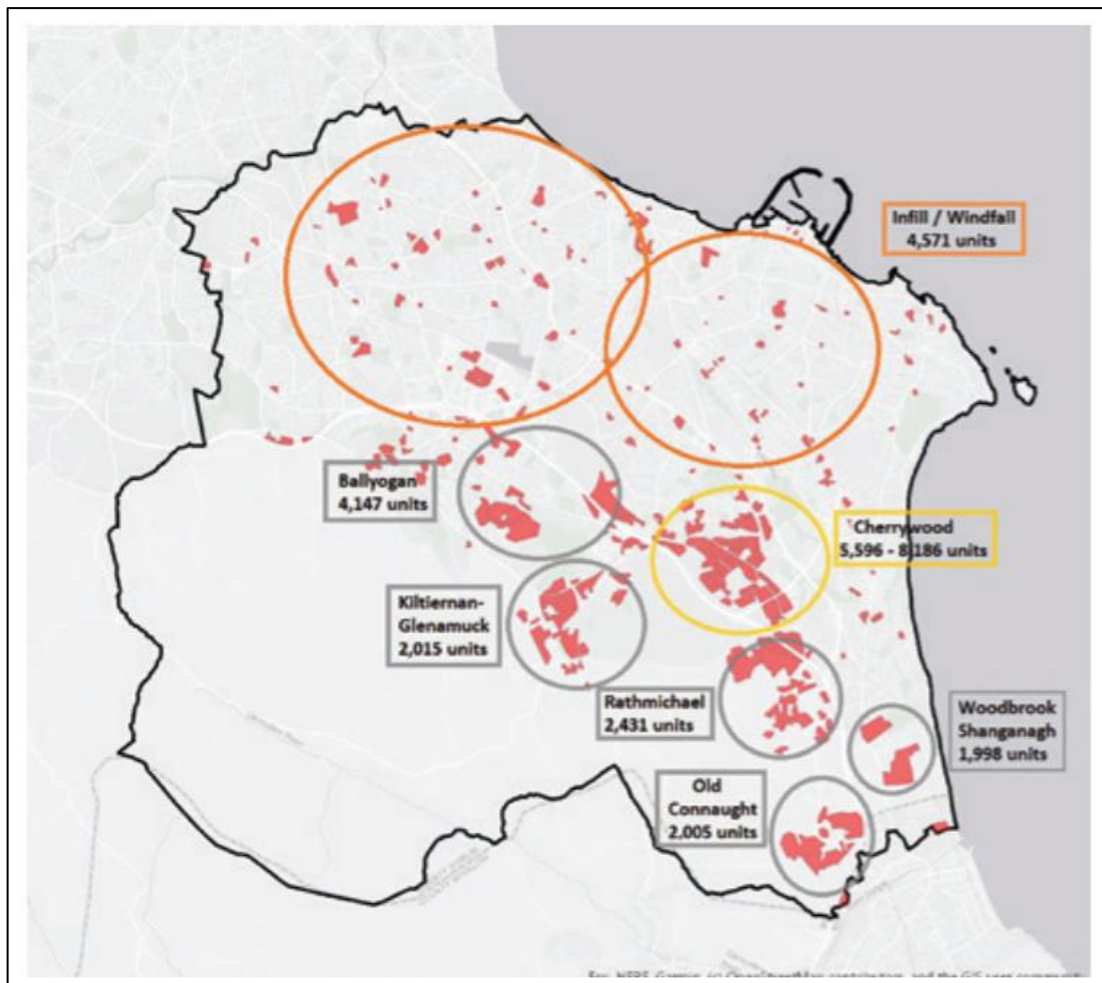


Figure 5.2: Residential Development Capacity Audit – Aggregate Data. The former CMH lands are identified in this map as a Infill/Windfall site (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028*).

The proposed development, that will provide 934 no. residential units, accords in full with the stated objective in relation to contributing to the County’s projected housing needs. The proposed development will make a significant contribution in this regard.

### 5.2.2 Strategic Regeneration Sites

Section 2.6.2 ‘Active Land Management’ of the *County Development Plan* contains **Policy Objective CS13: Strategic Regeneration** which is set out below;

*“It is a Policy Objective to support the development and renewal of strategic regeneration sites in the County.”*

We note that the ‘The former Dundrum Central Mental Hospital’ is identified, along with four other sites, as a ‘strategic regeneration site’. We further note that these sites have been identified in recognition of their potential role in increasing the efficiency of urban land-use and delivering compact growth targets.

In this regard, the proposed development aligns with the objective for such sites. Given the scale and nature of the proposed development and subject lands, including the significant number of residential units proposed, we outline the role that the lands can play in contributing to the delivery of compact growth in the County and wider Dublin Metropolitan Area, also in line with the objectives of the *National Planning Framework (NPF)* and the *Eastern and Midland Regional Assembly and Economic Strategy 2019-2031 (RSES)*.

### 5.2.3 Land Use Zoning Designation and Mapped Objectives

In the County Development Plan, the application site is zoned Objective A – ‘To provide residential development and improve residential amenity while protecting the existing residential amenities’, as shown in Figure 4.2 below.

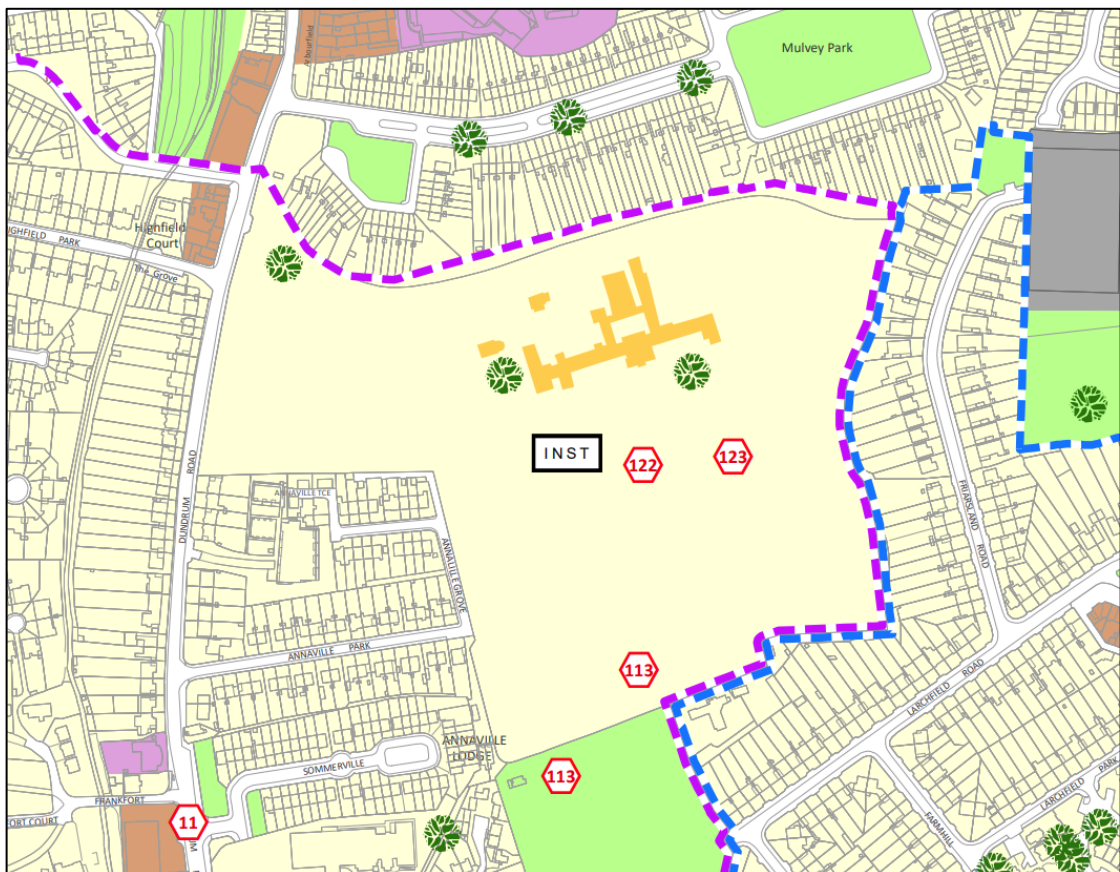


Figure 5.2: Extract from Map No. 1 of the Plan, illustrating the zoning objective and policy designations associated with the application site, incorporating the proposed material alterations.

The site is located in Zoning Objective A. Table 13.1.2 of the Plan, the contents of which are set out in Table 4.3 below outlines ‘Residential’ as being ‘Permitted in Principle’, as is Assisted Living Accommodation.



**Table 5.2: Uses permitted in principle and open for consideration for lands zoned objective ‘A’.** (Source *Dún Laoghaire-Rathdown County Development Plan 2022-2028*), with proposed uses in bold.

| ZONING OBJECTIVE ‘A’   |
|--|
| <i>‘To provide residential development and improve residential amenity while protecting the existing residential amenities’</i>  |
| Permitted in Principle   |
| <b>Assisted Living Accommodation, Community Facility<sup>a</sup>, Childcare Service<sup>a</sup>, Doctor/Dentist etc.<sup>a</sup>, Education<sup>a</sup>, Health Centre/ Healthcare Facility<sup>a</sup>, Open Space, Public Services, Residential, Residential Institution, Travellers Accommodation.</b>  |
| Open For Consideration   |
| <i>Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark<sup>b</sup>, Caravan/Camping Park-Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry<sup>c</sup>, <b>Offices less than 200 sq.m.<sup>c</sup>, Offices in excess of 200 sq.m<sup>d</sup>, Service Station, Place of Public Worship, Public House, Residential – Build to Rent, <b>Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery.</b></b></i> |
| <i>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’.</i>   |
| <i>b: Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.</i>   |
| <i>c: less than 200sq.m.</i>   |
| <i>d: Only applies to A zoned lands subject to Specific Local Objective 122.</i>   |

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 that 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’”. The proposed Management Suite will be less than 200 sq m and thus complies with the ‘Office less than 200 sq m’ provision.

We confirm that these facilities are of an appropriate scale for the subject site, having regard to the predominant residential nature of the development, and will serve the local population and can be easily accessed by foot or bike, appropriate car and cycle parking is provided for these uses, mitigation any potential traffic and transportation related impacts.

The purple dashed line, which encompasses the application site, refers to a ‘Boundary of lands for which a Local Area Plan will be prepared’. This represents the *Dundrum Local Area Plan (LAP)*. Compliance with the LAP is further addressed in Section 5.3 of this Report.



The application site is also subject to the INST objective, a number of *Specific Local Objectives* (SLOs) and tree symbols.

This mixed use development, inclusive of 934 no. residential units and 4,380 sq m of the above listed non-residential uses accord with land use zoning Objective A.

#### 5.2.4 Specific Local Objective No. 113

Specific Local Objective (SLO) No. 113 is relevant at the southern part of Central Mental Hospital lands. This designation also applies to the lands at the northern periphery of Rosemount Green, to the south of the subject site. The SLO is set out below;

*“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.”*

In line with the above, the proposed development introduces enhanced permeability and connectivity with adjoining lands, including the existing open space at Rosemount Green. Through the removal of key sections of the existing boundary wall, the proposal integrates the proposed public open space provision with Rosemount Green to the south. As well as enhancing the public open space provision for existing and future residents, the Masterplan provides a new community facility, inclusive of a multi-purpose hall and changing rooms.

The proposed development accords with this policy requirement and we consider that the redevelopment of this site provides a significant opportunity to deliver new community facilities and infrastructure for both existing and future residents.

#### 5.2.5 Specific Local Objective No. 122

SLO No. 122 provides flexibility for the subject site in respect of the quantum of office floorspace permissible under the zoning objective A. The SLO is set out below:

*“To allow offices in excess of 200 sq. metres in the former Central Mental Hospital buildings which are included on the Record of Protected Structures. Any application for offices in excess of 200 sq. metres shall (i) relate only to the former Mental Hospital Buildings with any extension to the building in office use to be only small ancillary structures, (ii) shall include a report that demonstrates that other suitable uses that are permitted in principle or open for consideration have been explored and that the reasons for discounting same relate to the proper planning and sustainable development of the area.”*

The proposed Part 10 Application does not propose office floorspace over 200 sq m, the only offices proposed through this Part 10 Application are the ancillary offices associated with the community facility, commercial, childcare and café uses, and the dedicated 123 sq m management suite. As these office do not exceed 200 sq m and are not located in the Protected Structures, which are outside the application boundary, we confirm that the SLO is not applicable in this instance.



### 5.2.6 Specific Local Objective No. 123

The site also has a designation of SLO No. 123 which sets out the following:

*“To ensure that, as Strategic Regeneration Sites, residential provision on the Central Mental Hospital Site and the Old Shopping Centre site will provide for a balanced mix of housing tenure, including affordable homes, and an acceptable mix of larger flexible units, and lifetime adaptable homes to ensure balanced, sustainable communities in Dundrum.”*

The proposed development provides a range of residential unit types, including one bedroom, two bedroom, three bedroom apartments, and 2 No. five bedroom assisted living units/community homes, resulting in a development that will meet the needs of a range of households. Own-door apartments and Universal Design (UD) units are provided. A balanced mix of tenures are proposed including social housing, right size for sale units, cost rental units, affordable for sale and the assisted living units, to meet the needs and requirements of all sectors of the community. The detail relating to the unit mix including: social housing units, affordable for sale and assisted living units is enclosed with the Application, please refer to *Architectural Design Report* and *Housing Quality Assessment Report* prepared by Reddy Architecture.

### 5.2.7 Tree Symbols

Three trees and woodland designations are included on the Land Use Zoning Map pertaining to the subject site with the relevant policy objective being OSR7: Trees, Woodland and Forestry:

*“It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an ‘urban forest’, and include a holistic ‘urban forestry’ approach.”*

The existing landscape at the subject site is characterised by a significant number of large mature trees. The proposed development derives from a landscape-led masterplanning exercise, which was informed by consultation with the DLRCC Parks Department, as well as the requirements of the Dundrum LAP. This determined the sensitive and compatible arrangement of built form within an existing mature landscape. As a result, the proposed development maintains the open character of the lands, together with the incorporation of the distinct, mature and characterful landscape features such as the walled garden and mature trees.

The planning application submission is supported by a detailed *Arboricultural Assessment* which notes that the loss of the tree vegetation has been mitigated against as much as possible with the retention of a lot of the more prominent trees on these grounds and in particular the main groups of trees around the front of the existing historic buildings and on the entrance avenue which will help screen and blend the proposed development into its surrounds.





New tree planting is also proposed as part of the landscaping which will complement the development and its incorporation into the surrounding area. It will also help to provide good quality and sustainable long-term tree cover and as it establishes and grows in size, it will be continuously mitigating any negative impacts created with the loss of the existing tree vegetation to facilitate the proposed development.

We therefore conclude that the proposed development complies with the Development Plan in this regard.

## 5.2.8 Climate Action

Chapter 3 has regard to energy efficiency in buildings, renewable energy, decarbonising motorised transport and urban greening and contains a number of overarching policies which are relevant to the proposed development. In this section, we confirm compliance with the following policies which are addressed in greater detail within the wider planning application documents.

Section 3.4.2.4 contains **Policy Objective CA13: Solar Energy Infrastructure** which states the following:

*“It is a Policy Objective to encourage and support the development of solar energy infrastructure, including photo voltaic (PV) and solar thermal and seasonal storage facilities infrastructure in appropriate locations, as a renewable energy resource which can contribute to the transition to a low carbon climate resilient County. It is also a policy objective to support Ireland’s renewable energy commitments by facilitating utility scale PV installations for the production of electricity provided they do not negatively impact upon the environmental quality, amenity or heritage of the area.”*

Section 3.4.2.6 contains **Policy Objective CA15: District Heating** which states the following:

*“It is a Policy Objective to support the development of district heat networks and the utilisation of waste heat recovery in the County as a renewable or low energy resource which can contribute to the transition to a low carbon climate resilient County. The Planning Authority will support the development of a Council wide District Heat policy following on from the forthcoming National Policy Framework for District Heat. (Consistent with RPO 7.38 of the RSES).”*

Section 3.4.3.2 contains **Policy Objective CA17: Electric Vehicles** which states the following:

*“It is a Policy Objective to support, the Government’s Electric Transport Programme by progressively electrifying our mobility systems by facilitating the rollout of Electric Powered Vehicle Recharging Parking Bays across the County and on public roads and other suitable location. The provision of e-bike chargers will be supported subject to the availability of Funding. (Consistent with NSO 4 of the NPF and RPO 7.42 of RSES).”*

Section 3.4.4.1 contains **Policy Objective CA18: Urban Greening** which states the following:

*“It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).”*

The proposed development, from an urban greening perspective, includes public, private and communal landscaped open space and incorporates SUDS measures that have been developed in conjunction with the project ecologist in relation to the enhancements of biodiversity within the scheme. Refer to the enclosed *Landscape Design Report* for full details.

In terms of energy efficiency and renewable energies, the proposed development incorporates solar panels, air source heat pumps and facilities for electric vehicle charging. See enclosed *Energy and Sustainability Report* prepared by EDC for further information.

We therefore confirm compliance with the above overarching policies.

### 5.2.9 Neighbourhood – People, Homes and Place

Chapter 4 of the Development Plan sets out the policy objectives aimed at creating and maintaining successful neighbourhoods and protecting residential amenities throughout DLR over the lifetime of this Development Plan, 2022-2028. These policy objectives are aimed at ensuring that the people and the amenities they require are a priority, that the delivery of new homes is provided for in an appropriate and sustainable manner and that DLR becomes ‘the’ place to live, work and visit.

In this section, we confirm compliance with the following policies which are addressed in greater detail within the wider planning application documents.

### 5.2.10 Sustainable Communities

Section 4.2.1.2 contains **Policy Objective PHP3: Planning for Sustainable Communities** which states:

*“It is a Policy Objective to:*

- *Plan for communities in accordance with the aims, objectives and principles of ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual – A Best Practice Guide’ and any amendment thereof.*
- *Ensure that an appropriate level of supporting neighbourhood infrastructure is provided or that lands are reserved for Sustainable Neighbourhood Infrastructure (SNI), in conjunction with, and as an integral component of, residential development in new residential communities as identified in the Core Strategy (see Figure 2.9, Chapter 2).*

- *Identify, provide and/or improve (as appropriate) supporting sustainable neighbourhood infrastructure in tandem with residential development in renewal/ redevelopment areas and existing residential neighbourhoods.*
- *Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES."*

Section 4.2.1.4 contains **Policy Objective PHP5: Community Facilities** which states:

*"It is a Policy Objective to:*

- *Support the development, improvement and provision of a wide range of community facilities throughout the County where required.*
- *Facilitate and support the preparation of a countywide Community Strategy."*

Section 4.2.1.5 of contains **Policy Objective PHP6: Childcare Facilities** which states:

*"It is a Policy Objective to:*

- *Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.*
- *Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage."*

Section 4.2.1.8 contains **Policy Objective PHP9: Health Care Facilities** which states:

*"It is a Policy Objective to:*

- *Support the Health Service Executive and other statutory and voluntary agencies in the provision and/or improvement of appropriate healthcare facilities - including the system of hospital care and the provision of community-based primary care facilities, mental health and wellbeing facilities.*
- *Encourage the integration of appropriate healthcare facilities within new and existing communities."*

As previously detailed, the proposed development provides for a range of facilities, including a childcare facility, community facility, retail units, medical centre, restaurant, café and public open spaces, which will provide for the needs of the new and existing communities.

### 5.2.11 Residential Density

Section 4.3.1.1 relates to residential density and contains Policy PHP18: Residential Density which states the following:

*“It is a Policy Objective to:*

- *Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*
- *Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”*

The proposed development, including 9 No. blocks ranging between 2 and 8 storeys, complies with national guidelines pertaining to residential density and compact growth as demonstrated at Section 4.3 of this Report.

Throughout this planning application submission, we demonstrate that the proposed development provides for an appropriate residential density and has been designed to provide a good levels of residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents. The proposal is therefore considered to comply with the above policy.

### 5.2.12 Residential Amenity

Section 4.3.1.3 contains **Policy PHP20: Protection of Existing Residential Amenity** which states the following:

*“It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.”*

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 precinct.

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, careful consideration has been given 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.

Refer to Section 5.5.2 of the enclosed *Planning Report* for further detail in this regard, including confirmation that the proposed development will not give rise to significant adverse

impact from a daylight, sunlight and overshadowing, overlooking, loss of privacy or overbearing impact.

### 5.2.13 Development on Institutional Lands

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.”*

In terms of compliance with the above, we note the following points:

- The subject lands are state owned and no longer required for institutional use. The site had been used by the HSE as the former Central Mental Hospital for Ireland, until it was vacated in 2022, in a scheduled move to a new facility in Portrane. This move is written into law under the Central Mental Hospital (Relocation) Act 2020, with the

current facility being described by the HSE as “no longer fit to provide the best patient care experience”. It is highlighted as a national priority, and part of the remit of DLRCO to deliver additional social housing, and the LDA 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 and local level, to contribute to the fulfilment of the above stated objective and are not required for an alternative institutional use.

- The redevelopment of the application site is supported by a comprehensive Masterplan which fully accounts for the provisions of the Institutional policy objectives attached to the lands and the *Dundrum Local Area Plan 2023*. The Masterplan has been developed by a multidisciplinary project team, in consultation with Dún Laoghaire Rathdown County Council (DLRCC). The enclosed *Masterplan Document* provides further details of this process including the key design parameters and demonstrates that the proposed Part 10 scheme evolved in line with the Masterplan. In addition, the principle of the redevelopment of the site has been established through the previous SHD Application for the site (ABP Ref. ABP-313176-22).
- In terms of the built heritage assets, embracing the built heritage was one of the core vision themes in the development of the Masterplan. As well as ensuring the sensitive design and siting of new built form in the setting of the heritage buildings, the Masterplan incorporates the adaptive re-use of a number of existing buildings and sensitive interventions to the boundary wall. In line with the Masterplan, this Part 10 proposal seeks to deliver the sensitive renovation and adaptive re-use of the Gate Lodge into a café and a number of interventions to the boundary wall including the removal of sections to provide permeability and lowering of sections on Dundrum Road to enhance the public realm. Further to this, the Part 10 includes new built form in the setting of the Main Hospital Building, Chapel and Infirmary which has been designed sensitively to respond to the heritage value and importance of the buildings. In addition to this, the site layout and landscape proposals have been designed to protect the setting of the heritage buildings, as well as ensure a positive relationship between the new built form and the existing historic landscape.
- There are a number of natural assets within the Masterplan boundary as well as built heritage, including the landscape which due to its historic importance and overall open character, formed a strong basis for a landscape-led masterplanning process and the site layout as currently proposed. As set out in the Architectural Heritage chapter of the EIAR and the Landscape Design Report, the character of the existing landscape embodies the historical function of the Central Mental Hospital, as a mental health facility whereby the landscape was considered to play an integral role in recovery and rehabilitation. Existing landscape features such as trees, the walled garden and open parkland are incorporated into the Masterplan and the Part 10 proposal which, in addition to protecting the site’s natural assets, ensures that the open character of the lands is retained. The success of the Masterplan (and therefore Part 10 proposal) in retaining the open character of the lands, in addition to the incorporation of existing landscape features, is largely owed to the significant quantity of publicly open space proposed. The public open space constitutes 30% of the Part 10 site area and is



characterised by a hierarchy of open spaces which provides for a range of activities and users.

In terms of density, the proposed Part 10 scheme provides a net density of 146 units p/h and a gross density of 97 units p/h which, in our opinion, successfully retains the open character of the lands. The proposed net density also accords with the range identified in the *Compact Settlement Guidelines 2024*. Referring to the Development Plan policy objectives surrounding residential density (i.e. Policy PHP18) we note that the Development Plan states that it is Council policy to encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area with the need to provide for high quality sustainable residential development. We also acknowledge the specific policy requirements relating to density that accompanies the Institutional designation of the subject lands whereby an average net residential density should be in the region of 35-50 units p/ha, but that 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. In this case, the density is increased because development is concentrated in certain parts of the site and as there is no development in other parts of the site. The retention of the site's open character is directly connected to the increased net density on site. It is considered that the proposed residential density is acceptable having regard to considerations surrounding open character, quantum of open space, standard of accommodation, positive relationship with built heritage assets.

- As well as meeting the policy requirements of the Institutional objective, the above elements, which include the adaptive reuse of the heritage and natural assets, will support the creation of a sustainable and distinctive neighbourhood.

As demonstrated by the analysis above, in our opinion, the proposed development complies with the policy requirements relating to the institutional nature of the lands in full. In summary, the proposed development balances the requirements arising from the Institutional designations of the land, and the need to provide a sustainable urban residential development which optimises the delivery of housing on a well-located, brownfield, underutilised and serviced site. This policy requirement is further addressed in respect of Section 12.3.8.11 below.

#### 5.2.14 Housing Mix

Section 4.3.2.3 contains **Policy Objective PHP27: Housing Mix** which states the following:

*"It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA."*

In accordance with the Development Plan, a variety of dwelling unit types and sizes are proposed as part of the scheme, which will be suitable for a variety of household types. The proposed scheme will contribute to the wider tenure mix in the local area.

### 5.2.15 Social Housing

Section 4.3.2.6 contains **Policy Objective PHP30: Provision of Social Housing** which states the following:

*“It is a Policy Objective to:*

- *Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.*
- *Support the provision of specific purpose-built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.*
- *Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.”*

Section 4.3.2.7 contains **Policy Objective PHP31: Provision of Social Housing** which states the following:

*“It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.”*

The proposed development will be an 100% affordable and social housing scheme. 19% of the units (181 No. units) will be social units, these comprise of 179 No. Social Homes (19.2% of the total), 2 No. 5-bed Assisted Living/Community Homes units (0.2% of the total).

The remaining 753 No. units are comprised of 52 No. Right Size for Sale units (5.6%), 122 no. Affordable for Sale units (13%) and 579 no. Cost Rental units (62%) which will be delivered as affordable housing under the *Land Development Agency Act 2021*.

Thus, the proposed development complies with the requirement to provide social units, whilst providing a balanced community.

The 2 no. Assisted Living /Community Homes are part of the social housing provision and are intended to accommodate those who need purpose-built accommodation and additional supports housing options. These units are ground floor units, with substantial private open spaces to the rear.

## 5.2.16 Quality Design and Placemaking

The following overarching policies relate to quality design and placemaking and are considered relevant to the proposed development. The scheme is assessed in greater detail against the specific development management standards below.

Section 4.4.1.1 contains **Policy Objective PHP35: Healthy Placemaking** which states the following:

*“It is a Policy Objective to:*

- *Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.*
- *Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013).*
- *Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.”*

Section 4.4.1.2 contains **Policy Objective PHP36: Inclusive Design and Universal Access** which states the following:

*“It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.”*

Section 4.4.1.3 contains **Policy Objective PHP37: Public Realm Design** which states the following:

*“It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.”*

The proposed development has been designed in line with inclusive design and universal access principles as demonstrated in the *Architectural Design Report*. We further note that the public open space provision has been designed to provide for a range of users and activities. In this regard, we also note that the scheme has been designed in line with DMURS principles, as outlined in the *DMURS Compatibility Statement*, prepared by ILTP.

We also highlight that 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, including: the maximisation of active frontages and natural surveillance, non-residential uses at ground floor, legible routes throughout site and a comprehensive lighting scheme. 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.

We therefore confirm compliance with the above policy requirements.

### 5.2.17 Shared Space Layouts

Section 4.4.1.6 contains **Policy Objective PHP40: Shared Space Layouts** which states the following:

*“It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the ‘shared space’ concept and guidance set out in the ‘Design Manual for Urban Roads and Streets’ (2013).”*

The proposed development includes a number of shared streets/ homezones which provide an environment which is pedestrian focused. We further confirm that the proposed development, including the shared streets/ homezones have been designed in line with DMURS principles, as outlined in the *DMURS Compatibility Statement*, prepared by ILTP.

### 5.2.18 Building Design and Height

Section 4.4.1.8 contains **Policy Objective PHP42: Building Design and Height** which states the following:

*“It is a Policy Objective to:*

- *Encourage high quality design of all new development.*
- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).”*

Appendix 5 ‘*Building Height Strategy*’ further details the *Development Plan* policy in relation to building height. Furthermore, the *Development Plan* notes the following in respect of building height:

*“The Council policy in relation to building height throughout the County is detailed in three policy objectives as set out in the Building Height Strategy (BHS) (Appendix 5):*

- *Policy Objective BHS 1 – Increased Height.*
- *Policy Objective BHS2 – Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan).*
- *Policy Objective BHS 3 – Building Height in Residual Suburban Areas.*

*The BHS also contains a detailed set of performance based criteria for the assessment of height so as to ensure protection of the unique amenities of the County whilst also allowing increased height.*

*In accordance with the policies set out in the BHS, where an argument is being made for increased height and/or a taller building and the Applicant is putting forward the*

*argument that SPPR 3 of the ‘Urban Development and Building Height; Guidelines for Planning Authorities’ (2018) applies, the Applicant shall submit documentation to show that compliance with the criteria as set out in Table 5.1 ‘Performance Based Criteria’ of the BHS (see Appendix 5).”*

Appendix 5 ‘Building Height Strategy’ further details the Development Plan policy in relation to building height. Section 4.4 sets out building height policies referred to above (BHS 1, 2 and 3).

On the basis that the subject site is within c.450 m of the Windy Arbour Luas Stop, **Policy Objective BHS 1: Increased Height** is considered to apply to the proposed development, which states:

*“It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD **and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route)** provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NPO 35, SPPR 1& 3).*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*

*Within the built-up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.”*

Policy Objective BHS2 – Building Heights in areas covered by an approved Local Area Plan or Urban Framework Plan is also considered to apply, as the Application site is within the Dundrum LAP area.

*“It is a policy objective to **promote and support proposed heights as set out in any approved statutory Local Area Plans** and as set out for certain areas in this County Development Plan (Sandyford Urban Framework Plan area, Dundrum Urban Framework Plan Area and Dun Laoghaire Urban Framework Plan area).*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above on the basis of placemaking. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*



*Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.”*

The Dundrum LAP provides guidance for the redevelopment of the former CMH site, with guidance that the proposed buildings should “generally range from 3 to 7 storey. Elements in excess of 7 storeys may be provided at the ‘Designated location of Height’” as shown on the Indicative Urban Form diagram. The proposed development includes an eight storey at the western side of Block 3, which is consistent with the ‘designated location of height’ in the LAP.

Having regard to Policy BHS 1 and BHS2, we confirm that the proposed development complies with SPPR 3 of the Building Height Guidelines, as demonstrated in Section 3.11 of the main Statement of Consistency. We further demonstrate compliance with the performance-based criteria contained at Table 5.1 of Appendix 5 of the Development Plan.

**Table 5.3: Assessment of proposed development against the Performance Based Criteria contained at Table 5.1 of the Development Plan.**

| Compliance for All Such Proposals  | Scheme Compliance with Criteria   |
|--|---|
| <b>At County Level</b>   |   |
| <p>Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.</p>  | <p>The subject development inherently complies with the overarching themes of the NPF by proposing a compact, well-designed, sustainable form of residential development on an underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development accords with the NPF’s aims to consolidate Dublin through the development of underutilised, infill sites in locations that benefit from high quality public transport links. Full details of compliance with national and regional policy objectives are provided above in this Report.</p>   |
| <p>Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport.*</p> | <p>The subject site is located approx. 450 meters (less than 10 minute walk) from Luas Green Line Windy Arbour with services at 3 minute intervals during peak hours. As well as providing a direct route into Dublin city centre, the Luas provides a direct route into Dundrum Town Centre, albeit just one stop to the south and Sandyford Business District.</p> <p>It is also less than 1km to Dublin Bus Routes at Bird Avenue, (with the S4 and S6 providing links UCD, Blackrock, Liffey Valley and Tallaght) and approximately 1km to Dublin Bus Routes at Dundrum and Taney Road (with the 74 and L25 providing links to Marly Park, Coombe Hospital, Eden Quay and Dun Laoghaire).</p> <p>Notably, the S4 Dublin Bus Route provides services into UCD from Bird Avenue which is within a 10 minute walk of the site.</p> <p>We therefore conclude that the subject site is well connected by public transport that provides frequent services to key employment and educational destinations, as</p> |





|   |  |
|---|--|
|   | <p>well as providing access to surrounding social infrastructure. The public transport options in close proximity connect the site to a wide range of key destinations.</p> <p>In terms of capacity, we note that the public transport that serves the site, namely the Luas and Dublin Bus routes, are high-capacity modes of public transport. The Traffic and Transportation Assessment, prepared by ILTP, provides an assessment of capacity and frequency to demonstrate this. This includes results of site surveys undertaken to determine capacity and frequencies and information known in respect of Luas/ bus capacity.</p> <p>The TTA concludes that the city bound Luas (in the AM peak hour (8.00-9.00) has a theoretical capacity of 8,160 persons per direction per hour, or 6,606 persons per direction per hour if using the assumed operational capacity. This is based upon a Luas capacity of 408 persons and a frequency of 3 min intervals.</p> <p>In this regard, the TTA also concludes that recent upgrades to 55m trams are now in operation. The survey result contained within the TTA are based upon the new capacity.</p> <p>In terms of the bus services that serve the site, an assessment of capacity and frequency determined that there is a total capacity of 1,710 persons in the AM peak hour. This is based on an operational capacity of 90 passengers per bus.</p> <p>The TTA further notes that capacity will be further increased by 25% over the coming years due to BusConnects.</p> <p>We conclude, having regard to existing public transport, that the site is served by high capacity and frequency public transport. Refer to the TTA for full details (Sections 3, 4 and 8).</p> |
| <p>Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.</p> <p><b>DM Requirement –</b></p> <p>Landscape and visual assessment by suitably qualified practitioner.</p> <p>Urban Design Statement.</p> <p>Street Design Audit (DMURS 2019).</p> | <p>The proposed development brings a currently insular site into active use, including a number of pedestrian and cyclist links that connect it to the surrounding residential areas. As a former high security mental health facility, the site is currently inaccessible to the public and surrounded by a 4-5m high perimeter wall. As well as making a significant contribution to the delivery of housing in line with national policy objectives, the proposed development enhances the Dundrum Area from a placemaking and regeneration perspective. The proposed development will deliver significant civic benefits, including a significant quantum of public open space, community facilities, local facilities and high-quality housing which will contribute to the overall vibrancy and quality of Dundrum as a place to live.</p> <p>Furthermore, the proposal includes the removal of sections of perimeter wall at both Dundrum Road and adjacent to Rosemount Green to the south of the site. This is considered to greatly enhance the relationship between the subject</p>   |



|   |  |
|---|--|
|   | <p>lands and the surrounding public realm, providing increased permeability and resultant movement of people, an enhanced network of community facilities and spaces and increased active frontage and natural surveillance.</p> <p>For further details, refer to the accompanying <i>Townscape/ Landscape and Visual Impact Assessment</i>, prepared by Macroworks (contained at Chapter 14 of the EIAR), the <i>Architectural Design Report</i>, prepared by Reddy A+U, the <i>Stage 1 Access and Walking Audit</i> and <i>DMURS Compatibility Statement</i>, prepared by ILTP.</p>  |
| <p>Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view.</p>  | <p>We note that no protected views and prospects apply the subject site.</p> <p>Nevertheless, we confirm that the proposed development will not give rise to significant visual impacts as evidenced by the enclosed <i>Townscape/ Landscape and Visual Impact Assessment</i>, prepared by Macroworks. This assessment considers the visual impact of the development proposed when viewed from 17 no. viewpoints from a range of locations external to the site.</p>  |
| <p>Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</p>  | <p>The site has been assessed for carrying capacity, as outlined in the enclosed engineering documentation, prepared by Barrett Mahony Consulting Engineers and ILTP Consulting.</p>   |
| <p><b>At District/Neighbourhood/Street Level</b></p>  |  |
| <p>Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</p> <p><b>DM Requirement –</b></p> <p>Proposal should demonstrate compliance with the 12 criteria as set out in “Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities” 2009.</p> <p>Street Design Audit (DMURS 2019).</p> | <p>The proposal is designed to maintain the site’s open character through the provision of significant public open space and to retain as much of the site’s valuable natural environment as possible including important features such as the walled garden and the mature trees on the site. The landscape strategy for the lands will enhance and complement the adjoining existing public open space (Rosemount Green) and promote the provision of pedestrian and cycle routes through the site. In addition, the site’s existing built environment is also incorporated into the proposed development through sensitive interventions and placement of buildings in the immediate setting of the Protected Structure complex, which will be adapted and re-used as an enterprise/innovation centre as part of the wider Masterplan proposal. Intervention to the site’s iconic boundary wall represents a balance between achieving increased permeability and connectivity into the surrounding area and a sensitive approach aimed at retaining the vast majority of an important heritage asset.</p> <p>In terms of improving permeability and connectivity, the site’s primary interface with the surrounding road network is onto Dundrum Road and proposes the part-removal of the boundary wall in this location in order to open up the site (heretofore fully enclosed) and facilitate public interaction between the development and the adjoining roadway. This</p> |



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|  | <p>also facilitates permeability through the site and provides a new urban edge and contemporary streetscape to the overall site.</p> <p>Furthermore, we confirm that the 12 no. urban design criteria have been addressed in full in Section 4.4 of this Report and the <i>Architectural Design Report</i> and the scheme is considered consistent with same. A <i>Stage 1 Access and Walking Audit</i>, prepared by HyTraS and a <i>DMURS Consistency Statement</i> prepared by ILTP is also enclosed.</p>  |
| <p>Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</p> <p><b>DM Requirement –</b></p> <p>Design Statement.</p>  | <p>The subject development comprises a series of individual buildings all designed in a different architectural style of varying scale, form and height and materials. There are no ‘uninterrupted walls of building in the form of slab blocks’.</p> <p>The design also proposes to open up the existing wall onto Dundrum Road, providing relief from the existing road and creating new access routes into the site.</p> <p>Refer to the accompanying <i>Architectural Design Report</i> for further details.</p>  |
| <p>Proposal must show use of high quality, well considered materials.</p> <p><b>DM Requirement –</b></p> <p>Design Statement.</p> <p>Building Life Cycle Report.</p>   | <p>A simple palette of materials provides appropriate visual variety to the elevations and the massing of the buildings.</p> <p>The quality of the proposed materials is further detailed in the <i>Architectural Design Report</i>. The application is also accompanied by a <i>Building Lifecycle Report</i> prepared by Reddy A+U.</p>   |
| <p>Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</p> <p><b>DM Requirement –</b></p> <p>Must also meet the requirements of “<i>The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009</i>”.</p> | <p>Intervention to the site’s iconic boundary wall represents a balance between achieving increased permeability and connectivity into the surrounding area and a sensitive approach aimed at retaining the vast majority of an important heritage asset.</p> <p>In terms of improving permeability and connectivity, the site’s primary interface with the surrounding road network is onto Dundrum Road and proposes the part-removal of the boundary wall in this location in order to open up the site (heretofore fully enclosed) and facilitate public interaction between the development and the adjoining roadway. This also facilitates permeability through the site and provides a new urban edge and contemporary streetscape to the overall site.</p> <p>Refer to the accompanying <i>Site-Specific Flood Risk Assessment</i> prepared by Barrett Mahony Consulting Engineers.</p> <p>The stream and marine frontage requirement is not applicable to the site.</p> |



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| <p>Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.</p> | <p>In terms of improving permeability and connectivity, the site's primary interface with the surrounding road network is onto Dundrum Road and proposes the part-removal, part reduction in height of the boundary wall in this location in order to open up the site (heretofore fully enclosed) and facilitate public interaction between the development and the adjoining roadway. This also facilitates permeability through the site and provides a new urban edge and contemporary streetscape to the overall site.</p>   |
| <p>Proposal must positively contribute to the mix of uses and/or building/dwelling typologies available in the area.</p> <p><b>DM Requirement –</b></p> <p>Design Statement.</p>               | <p>The proposed development will deliver a good range of uses including residential, childcare facility, café, restaurant, retail, medical and community. These uses will all contribute to the range of services available to the existing area and future neighbourhood being created on site. In terms of dwelling typologies, the proposal will deliver a range of residential unit types that will serve a wide range of household types. The unit mix will include 1, 2 and 3 bedroom apartments including duplex units and Assisted Living units.</p> <p>This unit mix will ensure that a variety of unit types to complement the predominant two storey family housing that characterises the area will be provided in this development.</p> <p>Refer to the accompanying <i>Architectural Design Report</i> for further details.</p> |
| <p>Proposal should provide an appropriate level of enclosure of streets or spaces.</p> <p><b>DM Requirement –</b></p> <p>Design Statement.</p>   | <p>The proposed development will deliver a series of significant new public open spaces that can be accessed by a range of thoroughfares primarily by pedestrians and cyclists. The creation of these spaces enables buildings predominantly ranging in height from 2 – 8 storeys to be established on the site. The framing of these significant public spaces by buildings in this height range provides an appropriate sense of scale and enclosure in what is a very significant 11.39 ha (overall) landholding.</p> <p>Refer to the <i>Architectural Design Report</i> for further details.</p>  |
| <p>Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.</p>   | <p>The proposed development achieves higher residential densities and increased building height (when compared to surrounding existing development) while maintaining a human scale of development. The scale and siting of the buildings achieves a sense of enclosure which contributes to the quality of the development from a placemaking perspective, without giving rise to significant visual impact or sense of overbearing. The active non-residential uses at ground floor, together with the high quality landscaping proposals which create high quality public realm, ensure a positive interface between people and built form.</p>  |



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| <p>Proposal must make a positive contribution to the character and identity of the neighbourhood.</p>  | <p>The proposed development has civic, social and cultural importance arising from the significant number of new dwellings proposed, the non-residential uses, including a new community centre, medical centre, childcare facility and a significant quantum of high quality public open space for both the future residents and the existing local community.</p> <p>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.</p> <p>Furthermore, in addition to this, the site layout and landscape proposals have been designed to protect the setting of the heritage buildings, as well as ensure a positive relationship between the new built form and the existing historic landscape. Existing landscape features such as trees, the walled garden and open parkland are incorporated into the Masterplan and Part 10 proposal which, in addition to protecting the site's natural assets, ensures that the open character of the lands is retained.</p> |
| <p>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</p> | <p>The proposed development includes a series of new buildings planned in a Masterplan context across the Application site ranging in height from 2-8 storeys. The prevailing height of the subject proposal is predominantly 2-6 storeys. The design strategy in respect of building heights is to taper heights around the edge of the site generally to 2 storeys in closest proximity to existing residential properties in order to minimise potential impacts on the residential amenities of these properties in relation to overlooking, overshadowing and overbearing, gradually increasing in height towards the centre. As noted above, there are parts of the development with 6 to 7 and up to 8 (at the western side of Block 3) storeys and these are centrally located. The topography of the site has also been used, where possible, to minimise visual impact yet deliver buildings to an appropriate height and scale.</p> <p>As demonstrated throughout this Report, the proposed development would not give rise to unacceptable impact upon neighbouring amenity.</p> <p>Refer to <i>Daylight and Sunlight – Impact of Neighbouring Properties Report</i> which includes the <i>Transient Overshadowing Assessment</i> prepared by GIA for full details in respect of daylight, sunlight and overshadowing. We note</p>   |



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|  | that the proposed development achieves an excellent level of compliance with the BRE Guidelines in this regard.  |
| <b>At Site/Building Scale</b>  |  |
| <p>Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</p> <p><b>DM Requirement –</b></p> <p>Must address impact on adjoining properties/spaces</p>  | <p>As outlined above, the planning application submission is supported by full daylight, sunlight and overshadowing assessments both in relation to impact on neighbouring development and the internal performance of the development. The GIA reports demonstrate excellent compliance in both contexts.</p> <p>In terms of ventilation, the proposed units are well served by windows, with 50% of the development dual aspect in nature. The proposed units are therefore considered to be well ventilated.</p> <p>In terms of views, a number of the proposed units are characterised by views onto open space or the site’s heritage assets. In respect of any units that face outwards, towards neighbouring residential development, good levels of privacy and outlook are maintained through the provision of generous separation distances and the retention of the boundary wall. The proposed development is therefore considered to provide an acceptable level of outlook and privacy for future occupiers of the scheme and existing neighbouring development.</p>   |
| <p>Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance “Site Layout Planning for Daylight and Sunlight” (2nd Edition).</p> <p>Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.</p> | <p>The 2008 BRE Guidance has been superseded by the 2022 version. As set out in detail in the enclosed Daylight and Sunlight reports, the proposed development is assessed having regard to the BRE ‘<i>Site Layout Planning for Daylight and Sunlight</i>’ 2022 including Appendix C, and the UK National Annex (as referred to in Appendix C of the 2022 Guidance), which confirms that daylight and sunlight assessment undertaken accords in full with the methodology set out in the above referenced guidance.</p> <p>As noted above, the daylight, sunlight and overshadowing assessments demonstrate an excellent level of compliance with the target values set out in the 2022 Guidelines.</p> <p>We note that whilst a number of shortfalls are evident, these are in our opinion are compensated by the overall quality of the scheme from a standard of accommodation and amenity perspective.</p> <p>The <i>Compact Settlement Guidelines, 2024</i>, acknowledge that daylight provision is only one of a number of considerations when considering the overall quality of the design and layout of a scheme and that any shortfalls should not automatically be a reason to refuse approval for a proposed development:</p> |





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|  | <p><i>“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”</i></p> <p>The BRE Guidelines 2022 also clearly state the guide: <i>“is not mandatory and the guide should not be seen as an instrument of planning policy.”</i> The guidance also acknowledges in its introduction that <i>“Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...”</i></p> <p>Refer to Section 5 of the <i>Daylight and Sunlight Internal Daylight, Sunlight and Overshadowing Report</i> and Appendix A of this Report for further detail on compensatory measures applicable to apartments with shortfalls. These measures are in addition to the general positive characteristics of the proposed scheme that will benefit all future residents (including provision of substantial public open space (3.2ha of the overall Masterplan site, the majority of which is delivered through this Application); on site services including a community/sports facility 1,749 sq m, retail units, café, medical centre; and the historic structures that add to the character of the scheme including boundary walls, gate lodge and walled garden.)</p> <p>Further to this, the proposed buildings within the development have been given careful consideration in terms of site planning and the arrangement of apartments in each building in order to maximise the number of dual aspect apartments (50% of the total).</p> <p>Furthermore, the proposed development has been designed in accordance with national and regional policy objectives pertaining to housing delivery and compact growth which require additional densities and identify increased building height as an important mechanism for achieving this. DLRCC and the LDA both have remits to deliver significant housing growth and contribute towards enabling an affordable housing sector in Ireland. In specific relation to the former Central Mental Hospital lands, in addition to the requirement for the delivery of a significant quantum of housing, the redevelopment of the lands, due to their former institutional use, is also required to retain the open character of the land and deliver at least 25% public open space. The balancing of these site specific policy</p> |
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|  | <p>requirements (including reference to the Dundrum LAP) has informed the proposed site layout, including the height, arrangement and density of the proposed buildings. In this respect, the proposed development successfully balances policy requirements and on the whole, provides an excellent standard of residential accommodation in an attractive setting for future occupiers as well as relating sensitively to the surrounding context.</p>  |
| <p>Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking, overbearing and/or overshadowing.</p> | <p>In terms of potential impact arising on adjoining properties, careful consideration was given to the impact of the development upon neighbouring amenity and the designers sought to minimise the potential for such impacts throughout the masterplanning and Part 10 design process.</p> <p><b>Overlooking</b></p> <p>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 <i>Architectural Design Report</i> (Section 3.6 and 3.7) for a series of illustrative maps and visualisations which demonstrate that the proposed development is acceptable in this regard. Design features include lowered heights by site boundaries, privacy screening at Block 5, and use of high-level clerestory windows at Blocks 4 and 5.</p> <p><b>Overbearing</b></p> <p>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.</p> <p>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.</p> <p>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</p> |



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|   | <p>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.</p> <p><b>Overshadowing</b></p> <p>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 <i>Daylight and Sunlight – Impact of Neighbouring Properties Report</i> (with an appended <i>Transient Overshadowing Assessment</i>) prepared by GIA.</p> <p>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.</p> <p>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”.</p> |
| <p>Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</p> | <p>Chapter 17 of the EIAR, and the <i>Historic Landscape Statement of Significance and Impact Assessment</i>, provides a detailed assessment of the potential impact of the proposed development on Architectural Heritage.</p> <p>The overall former CMH lands include Protected Structures, which are excluded from the Part 10 Application boundary. Chapter 17 of the EIAR considers the impact of the proposed development on the setting of those structures.</p> <p>Furthermore, the proposed Part 10 scheme does include intervention in respect of the perimeter wall and Gate Lodge, both identified as having value from an architectural heritage perspective. Refer to the <i>Gate Lodge Condition Report</i> and Drawings and the <i>Perimeter Wall Survey Report</i> and Drawings prepared by Reddy A+U and Alastair Coey</p>  |



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|   | <p>Architects, respectively, which provide details of the proposed intervention.</p> <p>The site layout and location of public open spaces has been informed by the Protected Structure and its setting. The layout includes a significant area of open space in front of the main hospital building, and between the main hospital building and the gate lodge, in addition to the provision of a plaza between the central Blocks (Blocks 3 and 7) which allow for views back to the main entrance of the main hospital building from the centre of the site.</p> <p>The relevant assessments conclude that the proposed development would not give rise to significant adverse impact in this regard. A residual moderately negative impact is identified in Chapter 17 of the EIAR. However, this is justified, as apart from the social gain associated with the proposed housing, the ‘do nothing’ option exposes the historic structures to considerable and ongoing risk. Chapter 17 notes that: <i>“Accepting change as part of adaptive re-use, whether that applies to Protected Structures or their attendant grounds, has consistently been proven as a necessary compromise to protect the most significant aspects for the appreciate of future generation.”</i></p> |
| <p>Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development.</p>  | <p>The enclosed <i>Energy &amp; Sustainability Report</i> prepared by EDC details the energy solutions selected for the proposed development, in addition to air source heat pumps, PV panels will be utilised to offset the energy demand with renewable energy.</p> <p>The Climate Chapter (Chapter 12) of the EIAR also considers the embodied carbon and operational stage carbon emissions.</p> <p>The design of the proposed development has had regard to the energy costs and carbon emissions arising from the development.</p>  |
| <p><b>County Specific Criteria</b></p>  |   |
| <p>Having regard to the County’s outstanding architectural heritage which is located along the coast , where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.</p> <p><b>DM Requirement –</b></p> | <p>The TVIA enclosed as Chapter 14 of the EIAR provides an assessment of the visual impact of the scheme.</p> <p>The proposed development is not located in the coastal area noted. This criterion is therefore not applicable to this assessment.</p>  |



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| <p>An urban design study and visual impact assessment study should be submitted and should address where appropriate views from the sea and/or piers.</p>   |  |
| <p>Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.</p> <p><b>DM Requirement –</b></p> <p>An urban design study and visual impact assessment study should be submitted.</p> | <p>The TVIA enclosed as Chapter 14 of the EIAR provides an assessment of the visual impact of the scheme.</p> <p>The proposed development is not located in the mountain foothill landscape area. This criterion is therefore not applicable to this assessment.</p>   |
| <p>Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage).</p>  | <p>The proposed development is based on both the previous Application for which permission issued, the Dundrum LAP guidance and extensive consultation with the Planning Authority, the Applicant for this Part 10 Application.</p>  |
| <p>Specific assessments such as assessment of microclimatic impacts such as down draft.</p>   | <p>A detailed microclimate assessment has been undertaken and is contained at Chapter 15 of the EIAR. It concludes that safety and pedestrian comfort is maintained in accordance with the Lawson Comfort and Distress Criteria with the proposed development in place.</p> <p>Refer to Chapter 15 of the EIAR for full details.</p> |



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| <p>Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.</p> | <p>This planning application is supported by a full biodiversity assessment enclosed as Chapter 8 of the EIAR and a <i>Natura Impact Statement</i>.</p> <p>The various assessments are supported by a full suite of ecology surveys including bat surveys and wintering birds.</p> <p>The NIS concludes with the following:</p> <p><i>“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.”</i></p> <p>In terms of birds, three seasons of wintering bird surveys have taken place covering the 20/21, 21/22 and 23/24 seasons. Refer to Appendix 8.1 - 8.3 of the EIAR for the survey reports and full conclusions. In summary, no direct impacts to any of the SPAs within the zone of influence are expected, indirect effects on the SPAs are considered unlikely. It further concludes that while some disturbance impacts may occur to the SPI species (Black-headed gull) recorder, this would not be deemed to be of potential significance.</p> <p>A full assessment has also been undertaken in respect of bats. Refer to Appendix 8.6 of the EIAR. In summary:</p> <p><i>“Consultation within the project team has taken place in relation to the potential impact of lighting on foraging. The proposed lighting has been modified to allow for foraging activity to continue on site. A derogation licence will be required for the felling of two trees associated with the bat roosts on site. A derogation licence will be required for the lighting disturbance of a bat roost on site. The presence of new buildings on site will alter the local environment but, foraging will continue on site. A pre-construction survey of buildings and trees will be carried out. The impact is deemed to be low adverse/negative/long term/not significant. A derogation licence has been granted for the proposed development.”</i></p> <p>In terms of bats, we further note that the project ecologist liaised closely with the M+E engineers to ensure the proposal of bat sensitive lighting across the scheme.</p> <p>In terms of collisions, given that the maximum height of the proposed development is 8 storeys and the limited bird activity recorded in respect of the site, it is not considered that bird collisions are likely to present as an issue in this scenario.</p> |
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| <p>Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.</p>  | <p>We note that the application site is currently served by the EIR network which enters the site from Dundrum Road. A Virgin Media network extends around the perimeter wall. The EIAR in support of this planning application has regard to the impact of the proposed development upon the existing telecommunication network. It concludes that the proposed development would have a neutral impact upon telecommunications in the surrounding area.</p>  |
| <p>An assessment that the proposal maintains safe air navigation.</p>   | <p>Due to the distance of the site from the airport of 13km, typical flight paths, and the medium rise scale of the tallest building within the scheme, on the basis of professional judgement, it is not considered that the proposed development will give rise to any impacts in this regard.</p>   |
| <p>Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.</p>  | <p>The planning application is accompanied by an Environmental Impact Assessment Report (EIAR), which includes a Biodiversity chapter addressing the potential impacts of new development on the ecology of the site. The application also includes a <i>Natura Impact Statement</i> (prepared to inform the Stage 2 Appropriate Assessment by the Board).</p> <p>These assessments enable the robust assessment of the proposed development upon the receiving environment and are supported by extensive survey work.</p> <p>The enclosed Masterplan is non-statutory and is not binding on the Planning Authority or consenting authority and therefore an SEA is not required.</p>   |
| <p>Additional criteria for larger redevelopment sites with taller buildings.</p>  | <p>The proposed heights are consistent with the Dundrum LAP, with the buildings primarily 3 to 7 storeys in height, and an 8 storey element at the 'designated location of height', justification for taller buildings is outlined elsewhere in this Report.</p>   |
| <p>Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.</p> | <p>The proposed development will deliver a new mixed use urban quarter on a large former institutional infill site. The proposed development is designed around a series of new internal streets and spaces or character areas, which serve to create a diverse and animated development. The scheme will deliver a gross density of 97 units per ha (or 146 units per ha in net density terms) through the provision of a range of architectural styles and contrasting scales within the development.</p> <p>As noted above, the proposed development responds to the scale of adjoining development through the graded use of heights (lower around the edges (2 storeys) through the site and the creation of generous separation distances between the taller elements of the scheme and neighbouring properties.</p> <p>The relationship of new development to the Protected Structure complex</p> |



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|  | <p>on the site has been fully considered as part of the design process and assessed as part of this application.</p> <p>Refer to the TVIA (contained at Chapter 14 of the EIAR), Chapter 17 'Architectural Heritage' of the EIAR, the Masterplan Report and <i>Architectural Design Report</i> prepared by Reddy Architecture.</p>  |
| <p>For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met</p> | <p>The subject site is located in an existing built-up area, surrounded by existing development, including protected structures and associated structures such as the perimeter wall in the immediate setting of the proposed development. Planning policy requires the provision of a minimum of 25% public open space, which reduces the area of the site available for development.</p> <p>Therefore, there are site constraints and the site is not an unconstrained redevelopment site, therefore, this criterion is not considered applicable to the proposed development. However, as demonstrated above, the proposed development achieves an excellent level of compliance with the BRE Guidelines with the UK National Annex standards.</p> |

Referring back to the aforementioned guidelines in relation to sustainable urban development and apartment development, there is a suite of national planning policy that requires the delivery of higher density development to achieve national objectives surrounding housing delivery. In the absence of finite land supply, increased building height is an essential component of achieving the required higher densities whilst maintaining a high standard of living accommodation and achieving sustainable communities.

In this context, the building height guidelines provide a mechanism through which building heights (and therefore densities), higher than those that may be permissible under the Development Plan, can be permitted.

The proposed development, including 9 No. blocks ranging between 2 and 8 storeys, complies with the Building Height Guidelines and the performance-based criteria contained at Appendix 5 of the County Development Plan, as demonstrated by the full suite of site-specific assessment enclosed with this submission.

Furthermore, the former CMH lands have been identified as a Key Development Site in the Dundrum LAP (DLAP). LAP Objective CMH10 states that "*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.*" The Designated location of height shown on Figure 2.18 is located at Blocks 3, 7 and 10. The only building above 7 storeys is at the western side of Block 3. Thus, the proposal is consistent with the Indicative Urban Form as per the DLAP.

The proposed development provides for an appropriate residential density and has been designed to provide good levels of residential amenity for future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.

### 5.2.19 Design in Local Area Plans

Section 4.4.1.9 contains **Policy Objective PHP43: Design in Local Area Plans** which states the following:

*“It is a Policy Objective to use the vehicle of Local Area Plans and/or Urban Framework Plans that form part of the County Development Plan, to promote and embed the principles of good urban design in the delivery of new, and existing, sustainable communities in specific areas of the County.”*

Compliance with the *Dundrum LAP* is set out later in this report.

### 5.2.20 Design Statements

Section 4.4.1.10 contains **Policy Objective PHP44: Design Statements** which states the following:

*“It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a ‘Design Statement’ and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.”*

In accordance with this policy, Reddy Architecture + Urbanism has prepared a detailed *Architectural Design Report* in respect of the proposal which, *inter alia*, demonstrates that the layout and design of the proposed development conforms with best practice.

### 5.2.21 Transport and Mobility

Chapter 5 of the Development Plan sets out policies in relation to transport. The following overarching policies relate to transport and mobility and are considered relevant to the proposed development. The scheme is assessed in greater detail against the specific development management standards below.

Section 5.5.1 contains **Policy Objective T4: Development of Sustainable Travel and Transport** which states the following:

*“It is a Policy Objective to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transport strategy for the County and the wider Metropolitan Area as set out in Department of Transport’s ‘Smarter Travel A Sustainable Transport Future 2009 –2020’, and subsequent updates and the NTA’s ‘Transport Strategy for the Greater Dublin Area 2016-2035’ and subsequent updates, the RSES and the MASP. (Consistent with NPOs 26, 64 of the NPF and RPOs 5.2, 5.3, 8.4, 8.7, 8.8 and 8.9 of the RSES).”*

Section 5.6.1 contains **Policy Objective T11: Walking and Cycling** which states the following:

*“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm permeability improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES).”*

Section 5.6.2 contains **Policy Objective T12: Footways and Pedestrian Routes** which states the following:

*“It is a Policy Objective to maintain and expand the footway and pedestrian route network to provide for accessible, safe pedestrian routes within the County in accordance with best accessibility practice. (Consistent with NPO 27 and 64 of the NPF and RPO 5.3 of the RSES).”*

Section 5.7.2 contains **Policy Objective T17: Travel Plans** which states the following:

*“It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES).”*

Section 5.7.3 contains **Policy Objective T18: Car Sharing Schemes** which states the following:

*“It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.”*

Section 5.7.4 contains **Policy Objective T19: Carparking Standards** which states the following:

*“It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5.”*

Section 5.8.4 contains **Policy T26: Traffic and Transport Assessments and Road Safety Audits** which states the following:

*“It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII’s ‘Traffic and Transport Assessment Guidelines’ (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.”*

Section 5.8.8 contains **Policy T30: Street Lighting** which states the following:

*“It is a Policy Objective to provide and maintain street lighting on the public road/footway/ cycleways throughout the County in accordance with commonly accepted best practice, the Council’s public lighting masterplan and the upgrade of sodium lights to LEDs.”*



Having regard to the above policy requirements, we highlight that 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 (TTA)*. In addition to the TTA, full details of the aspects of the proposal relevant to the above policies can be found in the following documents: *DMURS Compatibility Statement*, Traffic and Transport Assessment (which includes as appendices the Mobility Management Plan and Car Parking Management Plan), Public Lighting Plan and Details, and a *Construction Environmental Management Plan*.

In terms of walking and cycling, the provision of the proposed new cycle (and pedestrian) link through the proposed development provides a strategic new link that significantly augments the existing and planned 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.

Furthermore, with the implementation of the proposed internal infrastructure, the 15-minute walking catchment of the site 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.

On the above basis, we confirm full compliance with the above transport related policies.

## 5.2.22 Retail

Chapter 7 has regard to the County's towns and villages as well as overarching Council policy in respect to retail provision. The scheme is assessed in greater detail against the specific development management standards below.

Section 7.3.1.1 contains **Policy Objective RET1: Retail Planning Guidelines** which states the following:

*"It is a Policy Objective of the Council to have regard to the 'Retail Planning Guidelines for Planning Authorities' and the accompanying 'Retail Design Manual' published by the Department of the Environment, Community and Local Government in 2012 in determining planning applications for retail development."*

Section 7.5.5.1 contains **Policy RET8: Local Shops** which states the following:

*“It is a Policy Objective of the Council to facilitate the provision of local convenience shops in residential areas where there is a clear deficiency of retail provision, subject to protecting residential amenity.”*

Section 7.6.1.1 contains **Policy RET9: Assessment of Retail Proposals** which states the following:

*“It is a Policy Objective of the Council to ensure that applications for new retail development shall accord with the retail policies of the Development Plan and are objectively assessed as set out in the Retail Planning Guidelines for Planning Authorities (2012).”*

We note that at the heart of the Council’s retail strategy is a hierarchy of retail locations that form the basis for determining the quantum and location of new retail development. While the proposed development includes a number of retail units, we highlight that they have been proposed in order to provide for the development which will introduce a significant number of new people to the area, in line with the land zoning objective which lists ‘Shop-Neighbourhood’ as Open for Consideration. On this basis, it is not envisaged that the proposed retail units would serve a wider area nor conflict with established retail provision.

Notwithstanding this, we confirm that the scale of the proposed units is proportionate to the scale of the development and the number of new residents expected. We further confirm that due to the local nature of the proposed units, it is not expected that they will conflict with the vitality or viability of existing retail provision or Dundrum Town Centre. This planning application submission is also supported by a *Transport and Traffic Assessment* which has regard to the traffic impacts associated with the non-residential uses proposed, as well as the residential component. Lastly, we confirm that the design and siting of the non-residential uses within the scheme, including the retail units, provide activation and natural surveillance at street/ public realm level, contributing to the quality of the open spaces. Having regard to the above, we confirm that the proposed development does not conflict with the retail related policies referred to above. In our view, the non-residential uses proposed ensure the delivery of a distinctive and sustainable new community. The proposal is also considered consistent with the *Retail Planning Guidelines 2011*, particularly as it supports local retail units serving local residential area.

### 5.2.23 Green Infrastructure and Biodiversity

Chapter 8 contains policies relating to landscape, biodiversity and green infrastructure and are considered relevant to the proposed development. The scheme is assessed in greater detail against the specific development management standards below.

Section 8.3.1 contains **Policy GIB1: Green Infrastructure Strategy** which states the following:

*“It is a Policy Objective to continue to implement, and update, the DLR Green Infrastructure (GI) Strategy, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the development, design and management of high quality natural and semi-natural areas. This recognises the*



*ecosystems approach and the synergies that can be achieved with regard to sustainable transport, provision of open space, sustainable management of water, protection and enhancement of biodiversity.”*

Section 8.7.1.1 contains **Policy GIB18: Protection of Natural Heritage and the Environment** which states the following:

*“It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as ‘Stepping Stones’ for the purposes of Article 10 of the Habitats Directive.”*

Section 8.7.1.2 contains **Policy GIB19: Habitats Directive** which states the following:

*“It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European Sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.”*

Section 8.7.1.4 contains **Policy GIB21: Designated Sites** which states the following:

*“It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of ‘favourable’ conservation status of habitats and species within these areas.”*

Section 8.7.1.5 contains **Policy GIB22: Non-Designated Areas of Biodiversity Importance** which states the following:

*“It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and ‘Ecological Guidance Notes for Local Authorities and Developers’ (Dún Laoghaire-Rathdown Version 2014).”*

Section 8.7.1.11 contains **Policy GIB28: Invasive Species** which states the following:

*“It is a Policy Objective to prepare an ‘Invasive Alien Species Action Plan’ for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).”*

Section 8.7.1.12 contains **Policy GIB29: Nature Based Solutions** which states the following:

*“It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.”*

The proposed development is supported by a significant landscaping proposal which ensures the delivery of high-quality open space, including the retention of special landscape features such as mature trees, and local biodiversity enhancements and the delivery of a significant SuDS scheme. Furthermore, from an ecological and Habitats Directive perspective, the planning application is supported by an Appropriate Assessment Screening and Natural Impact Statement (NIS) and full ecological impact assessment contained within the Biodiversity Chapter of the EIAR. Having regard to the following sections which address the development management standards, we confirm that the proposed development complies with the overarching themes contained within Chapter 8 of the Development Plan.

#### 5.2.24 Open Space, Parks and Recreation

Chapter 9 relates to open space, parks and recreation and seeks to ensure the protection and enhancement of strategically important open spaces and parks to provide a wider range of benefits for the County. The overarching policies relevant to the proposed development are set out below. The scheme is assessed in greater detail against the specific development management standards below.

Section 9.2.1.4 contains **Policy OSR4: Public Open Space Standards** which states the following:

*“It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents ‘Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities’, (2009), the accompanying ‘Urban Design Manual - A Best Practice Guide’, and the ‘Sustainable Urban Housing: Design Standards for new Apartments’, (2020).”*

Section 9.3.1.1 contains **Policy OSR5: Public Health, Open Space and Healthy Placemaking** which states the following:

*“It is a Policy Objective to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan (NPAP) 2016, to increase physical activity levels across the whole population thus creating a society, which facilitates people whether at home, at work or at play to lead a more active way of life (consistent with RPO 9.16).”*

Section 9.3.1.3 contains **Policy OSR7: Trees, Woodland and Forestry** which states the following:

*“It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an ‘urban forest’, and include a holistic ‘urban forestry’ approach.”*

Section 9.4.1.5 contains **Policy OSR13: Play Facilities and Nature Based Play** which states the following:

*“It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County, and to support the aspirations of the forthcoming Play Policy prepared within the lifetime of the Plan. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities - children, teenagers, adults and older people – are facilitated in the public parks, open spaces and the public realm of Dún Laoghaire-Rathdown.”*

The proposed development is supported by a significant landscaping proposal which ensures the delivery of high-quality open space, including play space provision, the retention of special landscape features such as mature trees and local biodiversity enhancements and the delivery of a significant SuDS scheme. 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.

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. Local play opportunities for residents within the communal podium spaces. There are further informal play opportunities throughout the site. Having regard to the following sections which address the development management standards, we confirm that the proposed development complies with the overarching themes contained within Chapter 9 of the Development Plan.

## 5.2.25 Environmental Infrastructure and Flood Risk

Chapter 10 sets out the policies of the Council in relation to a range of infrastructure, pollution, flood risk and coastal protection. We address the overarching policies considered relevant to the proposed development below. The scheme is assessed in greater detail against the specific development management standards below.

Section 10.2.2.3 contains **Policy EI3: Wastewater Treatment Systems** which states the following:

*“It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly. It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater and surface water pollution. It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.”*

Section 10.2.2.4 contains **Policy EI4: Water Drainage Systems** which states the following:

*“It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12).”*

Section 10.2.2.6 contains **Policy EI6: Sustainable Drainage Systems** which states the following:

*“It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).”*

Section 10.2.2.7 contains **Policy EI7: Water Supply and Wastewater treatment and Appropriate Assessment** which states the following:

*“It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any European sites<sup>1</sup> and that the requirements of Article 6 of the EU Habitats Directive are met. (Consistent with RPO 10.7 of the RSES).”*

Section 10.2.2.8 contains **Policy EI8: Groundwater Protection and Appropriate Assessment** which states the following:

*“It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water’s Water Safety Plans to protect sources of public water supply and their contributing catchment.”*

Section 10.2.2.9 contains **Policy EI9: Drainage Impact Assessment** which states the following:

*“It is a Policy Objective to ensure that all new development proposals include a Drainage Impact Assessment that meets the requirements of the Council’s*

*Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1)."*

Section 10.3.2.2 contains **Policy Objective EI12: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling (Circular Economy Approach)** which states the following:

*"It is a Policy Objective:*

- To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective.*
- To aim to provide a supporting waste management infrastructure in the County for the processing and recovery of waste streams such as mixed municipal waste in accordance with the proximity principle.*
- To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented for recycling is preserved.*
- To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines.*
- To develop a County wide network of multi material recycling centres, bring centres and a re-use centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate.*
- To require the inclusion of such centres in all large retail developments to maximise access by the public.*
- To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities (an excerpt of which is contained in Appendix 6)."*

Section 10.4.1 contains **Policy EI14: Air and Noise Pollution** states the following:

*"It is a Policy Objective:*

- To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES)*
- To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website [www.epa.ie/air/quality](http://www.epa.ie/air/quality).*
- To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'."*

Section 10.7.2 contains **Policy Objective EI22: Flood Risk Management** which states the following:

*“It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (20010/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on ‘The Planning System and Flood Risk Management’ (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives, and all measures to mitigate identified flood risk, including those recommended under part 3 (flood risk considerations) of the Justification Tests, in the Strategic Flood Risk Assessment set out in Appendix 15 of this Plan.”*

This 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. Furthermore, the SuDS proposals are detailed the *Landscape Design Report* prepared by Aecom, supported by a *Habitats Management Plan*, prepared by Altemar (Appendix 8 of the EIAR).

In compliance with Policies EI3 and EI4, the waste water treatment system is connected to the public foul sewer, and the surface water will be separate system, see the *Infrastructure Report* prepared by BMCE.

The proposed development proposes to connect the existing water supply system and the foul water system, however, as per Policy EI7, the Application includes an *AA Screening Report* and *Natura Impact Statement*, prepared by Altemar.

In respect of Policy EI8, the proposed development has been fully considered from a hydrological and ecological perspective, as set out in the Hydrology Chapter of the EIAR and the *Natura Impact Statement*, prepared by Altemar. The *Water Framework Directive Assessment* prepared by AWN also considers the issues arising

In compliance with Policy EI9, the Application includes a *Stormwater Impact Audit* (as per Appendix 7 of the Development Plan), which is enclosed as 8 of the BMCE *Infrastructure Report*.

In relation to Policy EI12 the enclosed EIAR includes an assessment of Waste at Chapter 19, including an *Operational Waste Management Plan* and *Resource Waste Management Plan* at Appendix 19.

Assessments of Air and Noise are included in the EIAR in Chapters 11 (Air Quality) and Chapter 13 (Noise and Vibration) respectively.

A *Site Specific Flood Risk Assessment*, also prepared by BMCE, is enclosed. The flood risk assessment has been carried out in accordance with *The Planning System and Flood Risk Assessment Guidelines for Planning Authorities* whereby the developed site is shown not to be at a significant risk from flooding and to not create a significant risk to adjoining areas or downstream. Furthermore, the enclosed EIAR gives full consideration to the proposed development from an air and noise pollution and waste management perspective.



## 5.2.26 Heritage and Conservation

Chapter 11 contains specific objectives and guidance relating to the protection of the County's heritage under the headings of archaeological heritage, architectural heritage and countywide heritage (which includes the DLR Heritage Plan), and important overarching themes which require specific, additional consideration. The following overarching policies are considered relevant to the consideration of the proposed development. The scheme is assessed in greater detail against the specific development management standards below.

Section 11.3.1.1 contains **Policy HER1: Protection of Archaeological Heritage** which states the following:

*"It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments."*

Section 11.3.1.2 contains **Policy HER2: Protection of Archaeological Material in Situ** which states the following:

*"It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG)."*

Section 11.4.1.1 contains **Policy Objective HER7: Record of Protected Structures** which states the following:

*"It is a Policy Objective to include those structures that are considered in the opinion of the Planning Authority to be of special architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest in the Record of Protected Structures."*

Section 11.4.1.2 contains **Policy Objective HER8: Work to Protected Structures** which states the following:

*"It is a Policy Objective to:*

- i. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- ii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht.*
- iii. Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise.*

- iv. *Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.*
- v. *Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.*
- vi. *Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.*
- vii. *Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.*
- viii. *Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure.*
- ix. *Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- x. *Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES)."*

Section 11.4.1.3 contains **Policy Objective HER9: Protected Structures Applications and Documentation** which states the following:

*"It is a Policy Objective to require all planning applications relating to Protected Structures to contain the appropriate level of documentation in accordance with Article 23 (2) of the Planning Regulations and Chapter 6 and Appendix B of the 'Architectural Heritage Protection Guidelines for Planning Authorities', or any variation thereof."*

Section 11.4.3.2 contains **Policy Objective HER20: Buildings of Vernacular and Heritage Interest** which states the following:

*"It is a Policy Objective to:*

- i. *Retain, where appropriate, and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment and to preserve surviving shop and pub fronts of special historical or architectural interest including signage and associated features.*
- ii. *Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts, pub fronts and other significant features.*
- iii. *Ensure that appropriate materials be used to carry out any repairs to the historic fabric."*

The proposed development responds to the site's built heritage through sensitive design and robust and detailed assessment in respect of the heritage assets on site. The proposed development has been assessed from an architectural and archaeological perspective, as contained within the Archaeological and Cultural Heritage and Architectural Heritage Chapters of the EIAR (Chapters 16 and 17 of the EIAR, respectively). Furthermore, the planning documentation acknowledges the protected structure status of a number of the buildings within the wider site boundary and assesses them accordingly. Having regard to the aforementioned assessments, we conclude that the proposed development aligns with the overarching policy themes contained at Chapter 11 of the Development Plan. Works to historic structures on site, such as the boundary wall, will be carried out to the highest standards.

### 5.2.27 Development Management

Having regard to the introduction of Chapter 12, we confirm the following:

- In line with Section 12.1.1.2 'Design Statements', this planning application is accompanied by a Design Statement (see *Architectural Design Report* prepared by Reddy A+U);
- In line with Section 12.1.1.3 'Landscape Plans', a Landscape Plan, supported by a landscape design rationale is enclosed with this submission, prepared by Aecom Landscape Architects;
- With consideration to Section 12.1.2 'Impacts on the Environment', relating to Impacts on the Environment, we confirm that the application is supported by a full *Environmental Impact Assessment Report* (EIAR);
- In accordance with Section 12.1.2.2 'Appropriate Assessment', the planning application is supported by an *Appropriate Assessment Screening* and *Natura Impact Statement*;
- In line with Section 12.1.2.3 'Ecological Impact Assessment', it is also accompanied by a full ecological assessment, contained within the EIAR at Chapter 8 – Biodiversity;
- In line with Section 12.2.1 'Built Environment', an *Energy & Sustainability Report*, prepared by EDC is enclosed with this application.
- Having regard to Section 12.2.2 'Renewable Energy', we confirm, that the proposed development includes solar panels;
- In accordance with Section 12.2.5 'District Heating', the proposed development will rely on a centralised community heating network system which can future proof the development if district heating becomes available in the area in future.
- In accordance with Section 12.2.6 'Urban Greening', the proposed development provides extensive planting and habitat creation. It also incorporates significant Nature-Based Solutions (NBS), including SuDS measures such as intensive and

extensive green roofs, swales, raingardens/ bioretention pits, permeable paving and integrated constructed wetland.

- In line with Section 12.3.1 'Quality Design', we confirm that the proposed development provides a high quality living environment for residents in respect of the proposed units themselves and the wider open space and site layout. Refer to the *Architectural Design Report* for full details in respect of the design rationale for the development. The enclosed *Housing Quality Assessment*, prepared by Reddy A+U and the *Internal Daylight, Sunlight and Overshadowing Report* prepared by GIA also demonstrates the quality of the scheme from a standard of accommodation perspective.
- We further note the design criteria set out in Section 12.3.1.1 'Design Criteria' and consider that compliance is demonstrated throughout this Statement and accompanying documentation.
- Section 12.3.2.1 refers to the development of Sustainable Neighbourhood Infrastructure, as consistent with the policy as it relates to an Existing Built Up Area, this Application includes a *Social Infrastructure Audit* and *School Demand Assessment*. The proposed development provides a range of facilities that will be developed alongside the residential development.
- In respect of Section 12.3.2.3, the proposed development includes a Community Facility which has been designed in close consultation with the DLRCC Parks Department.

### 5.2.28 Childcare Facilities

Section 12.3.2.4 of the County Development Plan states:

*"In assessing individual planning applications for childcare facilities, the Planning Authority will have regard to the following:*

- *Suitability of the site for the type and size of facility proposed.*
- *Adequate sleeping/rest facilities.*
- *Adequate availability of indoor and outdoor play space.*
- *Convenience to public transport nodes.*
- *Safe access and convenient off-street car parking and/or suitable drop-off and collection points for customers and staff.*
- *Local traffic conditions.*
- *Number of such facilities in the area. In this regard, the applicant shall submit a map showing locations of childcare facilities within the vicinity of the subject site and demonstrate the need for an additional facility at that location.*
- *Intended hours of operation.*
- *Applications for childcare facilities in existing residential areas will be treated on their merits, having regard to the likely effect on the amenities of adjoining properties, and compliance with the above criteria.*



- *Detached houses or substantial semi-detached properties are most suitable for the provision of full day care facilities. Properties with childcare should include a residential component within the dwelling, and preferably should be occupied by the operator or a staff member of the childcare facility.*
- *For new residential developments, the most suitable facility for the provision of full day care should be a purpose built, ground floor, standalone property.*
- *In considering applications for new Childcare Facilities the Planning Authority will refer to Section 4.7 of the Design Standards for New Apartments Guidelines for Planning Authorities, (2020), specifically the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, as detailed in Section 4.7, with the exception for one-bedroom or studio type units, which 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.*

*In assessing applications for new childcare facilities, the Planning Authority will consult with the DLR County Childcare Committee to assess the need for the type of facility proposed at the intended location. (Refer to Section 12.4.10 in relation to car parking standards for childcare facilities)."*

In this case, a residential development of 934 No. units is proposed and the proposed development includes a childcare facility of 716 sq m.

The enclosed *Social Infrastructure Audit*, which has regard to the capacity within the existing local childcare network, notes that the potential childcare uptake of the proposal is likely to be 132 no. childcare places (based on all 2-bed 4 person units and 3-bed units, but excluding the 1-bed units and 2-bed 3 person units), which are accommodated by the proposed facility. Refer to the enclosed *Social Infrastructure Audit* prepared by TPA for further details.

Furthermore, we note the location of the site close to public transport connections, including the Windy Arbour Luas stop, c. 450 m from the site. The TTA, prepared by ILTP, also has regard to the traffic impact of the proposed development, including the non-residential uses, and demonstrates that the development will not give rise to unacceptable impact in this regard. Car parking and cycle parking provision in respect of the childcare facilities has also been considered. Lastly, we confirm that the proposed facility will operate between 7.00 and 19.00 unless otherwise agreed with DLRC.

Having regard to the above, we confirm that the proposed childcare facilities align with the Development Plan requirements in this regard.

## 5.2.29 Health Care Facilities

Section 12.3.2.6 of the Development Plan refers to health care facilities of various scales and intensities.

*"The Planning Authority will distinguish between small-scale medical practices involving one to two principals (i.e. doctor/dentist/physiotherapist owning the business) with a maximum of one to two employees, and larger medical practices accommodating two or more medical practitioners and two or more support staff...."*

*Larger scale and group medical practices should normally only be located in Neighbourhood, District and Major Town Centre zonings. They should not have negative impacts in terms of generating overspill of car parking, traffic hazard, negative impact on adjoining residential uses, and should complement the existing uses and buildings and should have only modest signage.”*

The proposed development, which includes 288 sq m of medical floorspace, is not considered to conflict with the policy requirements in this regard. Whilst the facility comprises a number of consulting rooms and will accommodate more than two employees it is purpose-built unit within a new residential development of 934 no. dwellings at a location that is highly accessible by active travel means. Therefore, whilst the Development Plan states that group medical practices should normally only be considered under certain zonings, in this case the scale of development is such that a new neighbourhood is being delivered and the scheme is designed from the outset to incorporate the proposed medical facility and all impacts have been assessed. Thus, the proposed medical unit complements the proposed use and the building and can therefore be located on a residentially zoned site with no undue negative impacts arising.

### 5.2.30 Residential Size and Mix

Section 12.3.3.1 ‘Residential Size and Mix’ of the Development Plan states:

*“In order to demonstrate compliance with Policy Objective PHP27 and based on the findings of the Housing Strategy and HNDA, planning applications received for 50+ residential units either individually or cumulatively with lands located within the neighbourhood (10-minute walk) will be required to incorporate a variety and choice of housing units by type and size so as to meet the differing household need in the County. Council Part 8 or Part 10 residential schemes, may propose a different mix having regard to the specific needs of the Council Housing Department.”*

It further states:

*“The proposed provision of residential units (both houses and apartments), shall provide a mix that reflects existing, and emerging household formation, housing demand patterns and housing demand patterns and trends identified locally and/ or within the County. New residential communities (as set out in the Core Strategy and Figure 2.9 of the Core Strategy Map) shall ensure an appropriate mix including a proportion of larger units. Applications received in both new residential communities and within the residual built up area shall include:*

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*
- *A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1.*
- *A site and/or floor plans that clearly identify proposed units that:*
  - *Are designed and located having regard to the needs of older people and/or persons with a disability.*



- Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.
- A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.
- No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types.”

Table 12.1 sets out the apartment mix requirements referred to by Section 12.3.3.1 above.

The proposed development comprises of 934 no. residential units; all of which are apartments (including 6 no. duplex units and 2 no. assisted living units). The Table below demonstrates the percentage of each unit type on a scheme wide basis.

**Table 5.4: Scheme wide unit mix.**

|                         | Apartments  | Duplexes | Total      |
|-------------------------|-------------|----------|------------|
| <b>1 bed</b>            | 342 (36.6%) |          | <b>342</b> |
| <b>2 bed (3 person)</b> | 98 (10.5%)  |          | <b>450</b> |
| <b>2 bed (4 person)</b> | 352 (37.7%) |          |            |
| <b>3 bed</b>            | 134 (14.3%) | 6 (0.6%) | <b>140</b> |
| <b>5 bed</b>            | 2 (0.2%)    |          | <b>2</b>   |
|                         | <b>928</b>  | <b>6</b> | <b>934</b> |

Having regard to the apartment development specific requirements of Section 12.3.3.1 and associated Table 12.1, we note that schemes of over 50 units in existing built-up areas are required to generally comply with the following:

In respect of mix of studio/ one/ two bedroom requirements, Table 12. 1 requires:

*“Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios.”*

In respect of 3+ bedroom requirements, Table 12.1 requires:

*“Minimum 20% 3+ bedroom units.”*

As shown in Table 5.4 above, the proposed apartment mix differs from Section 12.3.3.1 and Table 12.1 of the Development Plan, as explained below:

- The total of proposed one bed units is 36.6% (there are no studio units) which exceeds the 30% restriction on the combined total of these unit types as set out in Table 12.1.
- The proposed apartment development comprises 14.3% three bed units which is below the requirement for 20% 3+ bed units as set out in Table 12.1.

As quoted above, Section 12.3.3.1 of the Development Plan states that *“Council Part 8 or Part 10 residential schemes, may propose a different mix having regard to the specific needs of the Council Housing Department”*. This exemption applies to the proposed development, which is a Part 10 development proposed by Dún Laoghaire Rathdown County Council in partnership

with the LDA. The development will provide 100% affordable and social housing, which caters to specific housing needs in the County not generally served by conventional residential developments in the surrounding area.

The *DLR Housing Delivery Action Plan 2022-2026* splits DLR County into 3 areas for social housing. The site is located within Area 2 between the M50 and N11. This is the Area with the highest “2022-2026 target distributed by demand”, at a rate of 1,276 no. units of a total of 1,994 no. In terms of housing typology the Plan states:

*“While more than 50% of the Council’s current housing stock is made up of three and four-bedroom properties, dlr has been cognisant of changing demographics and the need for smaller homes. As a result, approximately 67% of all homes provided directly by dlr in the period from 2014 to 2021 have been 1 and 2-bed dwellings. The SHNA 2021 identifies that 61 per cent of people have a 1-bed housing need with a further 24.5 per cent with a two-bed need and the balance with a 3 or 4 bed need.”*

Considering the acceptability of the proposed housing mix from a wider planning assessment perspective, we acknowledge the importance of policy objectives surrounding housing mix and the key role that they play in the creation of mixed and balanced sustainable communities. However, when introducing new residential development into an existing built-up area, it is our opinion, that an appropriate housing mix (in terms of unit size and type) should be considered in the context of the wider housing mix within the area surrounding the site, rather than in isolation.

In this regard, we draw attention to the strong prevalence of existing lower density dwelling houses (3 bedrooms +) in the area immediately surrounding the site. The proposed housing mix, which contains a greater proportion of smaller units, responds to this context and recognises the need for further variation of housing types to ensure a genuine mix of housing type in the area.

The proposed tenure mix and unit mix was the subject of detailed engagement between Dún Laoghaire Rathdown County Council and the LDA as the project evolved and as such the proposed development responds to a demonstrable undersupply of other housing types in the area, including units suited to smaller households and provides the housing needed to deliver mix and balance, both within the site and within the surrounding area. Importantly, this also aligns with the overall vision to transform the subject lands into a leading example of sustainable living which delivers a mix of tenures where people of all ages can live.

### 5.2.31 Residential Density

Section 12.3.3.2 of the Development Plan sets out the following in relation to residential density:

*“In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines document:*

- *‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009).*
- *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020).*

*As a general principle, and on the grounds of sustainability, the objective is to optimise the density of development in response to type of site, location, and accessibility to public transport. (See policy PHP18, Chapter 4)."*

We note in regard to the above, that the *Compact Settlement Guidelines 2024* have since come into effect and they replace the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities 2009*, and therefore the residential density limits set out in the 2009 Guidelines are no longer in effect.

The proposed development will have a net residential density of 146 units per hectare (gross residential density of 97 units p/ha). The retention of significant areas of open space and mature trees in order to maintain the open character of the site increases the net density at the site. This density is appropriate for the application site, having regard to national policy including the *National Planning Framework* (including Sections 2.2, 3.2, 4.5), and the *Compact Settlement Guidelines 2024* (including Sections 3.3.1 and 3.4 Table 3.1 ) and *Apartment Guidelines 2023* (including Section 2.4) which promotes higher residential densities at well located, serviced urban locations.

The locational characteristics of the site in the context of residential density is further discussed in relation to national guidelines and Policy PHP21: Development on Institutional Lands in Section 5.2.13 of this Report, and Section 5.4 of the enclosed *Planning Report*.

### 5.2.32 Residential Development – General Requirements

We note that all policy requirements contained in Section 12.3.4 of the Development Plan apply to apartments. Refer to the *Housing Quality Assessment* prepared by Reddy A+U which demonstrates compliance with the relevant standards.

### 5.2.33 Roads and Footpath Requirements

Section 12.3.4.1 of the Development Plan sets out the Council's policy in respect of roads and footpath requirements, including the provision of dished kerbs at junctions and vehicular entrances to facilitate people with ease of movement.

We confirm compliance with this policy requirement. Refer to the *DMURS Compatibility Statement* prepared by ILTP for full details.

### 5.2.34 Habitable Rooms

Section 12.3.4.2 refers to the requirements for habitable rooms in terms of minimum size and dimensions relative to national guidelines and standards, as well as standard of accommodation provided in respect of daylight, sunlight and ventilation:

*"The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission, including the minimum dimensions as set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for*



*Planning Authorities’ (2020), and ‘Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007).*

*All habitable rooms within new residential units shall have access to appropriate levels of natural /daylight and ventilation. Development shall be guided by the principles of Site Layout Planning for Daylight and Sunlight, A guide to good practice (Building Research Establishment Report, 2011) and/or any updated, or subsequent guidance, in this regard. A daylight analysis will be required for all proposed developments of 50+ units, or as otherwise required by the Planning Authority. The impact of any development on existing habitable rooms should also be considered.”*

The proposal has been assessed in the context of the *Compact Settlement Guidelines 2024* and the *Apartment Guidelines 2023* in Sections 4.3 and 4.5 of this Report. The enclosed *Housing Quality Assessment Report*, demonstrates compliance with the relevant standards for habitable rooms both for houses and apartments. We further confirm that all habitable rooms within new residential units have access to appropriate levels of natural daylight, sunlight and ventilation.

Refer to the *Daylight and Sunlight – Internal Daylight, Sunlight and Overshadowing Report*, prepared by GIA which provides an assessment of the scheme in the context of BRE ‘*Site Layout Planning for Daylight and Sunlight’ 2022* including Appendix C, and the UK National Annex (as referred to in Appendix C of the 2022 Guidance), this Report demonstrates that the proposed development would provide a give rise to very good daylight and sunlight access across the scheme.

### 5.2.35 Phased Development

Section 12.3.4.4 requires the following in respect of developments over 100 no. residential units:

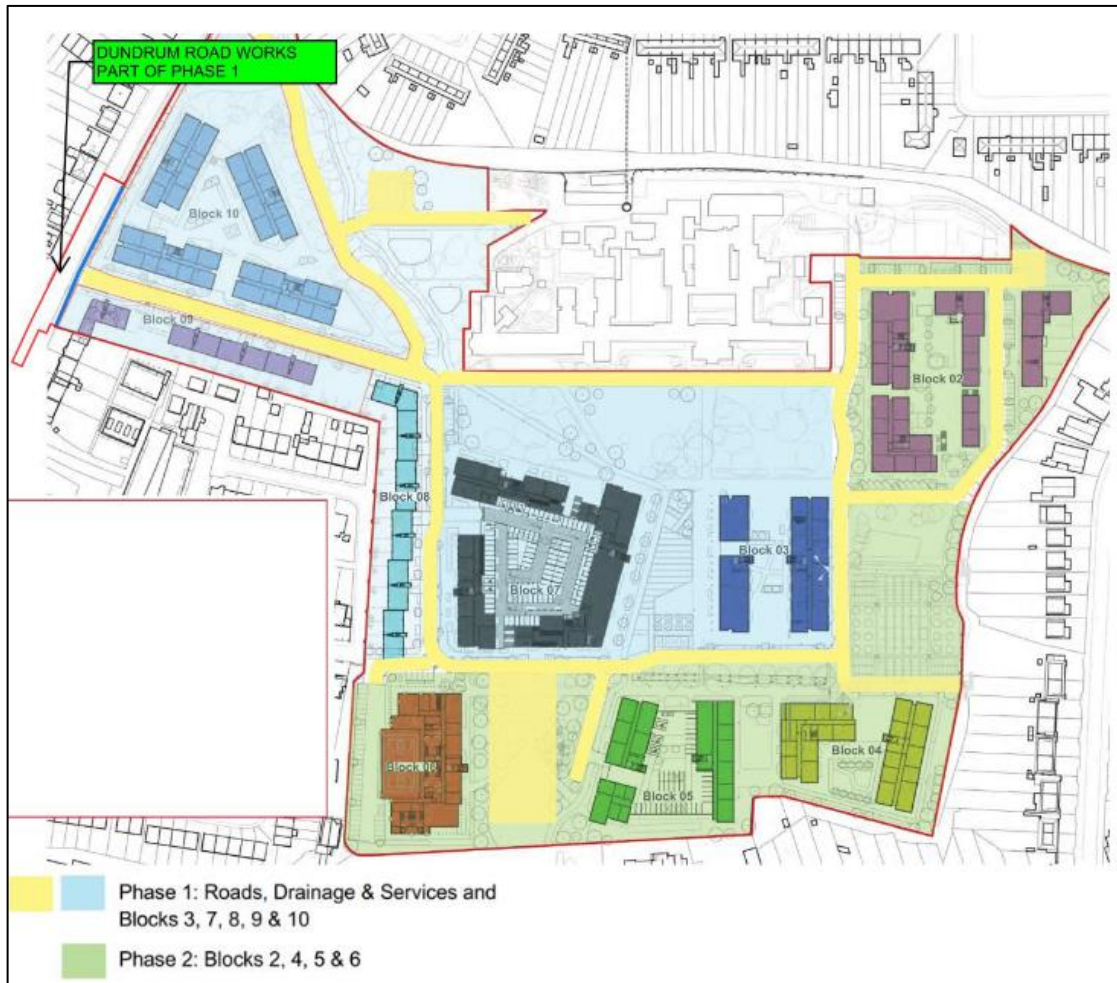
*“No large developments over 100 residential units shall be permitted unless it can be demonstrated that adequate provisions for specified physical and social infrastructural requirements, including: roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support development.*

*In addition, when considering proposals for development within the curtilage of Protected Structures a proposed phasing agreement should be provided (refer to Section 12.11.2.3).*

*A phasing schedule for any such development shall be submitted with a planning application.”*

The proposed development is supported by a phasing plan which, due to the scale of development proposed in this application, provides for the delivery of the development in two phases of construction. See *Site Plan, Outline Phasing Plan* (RAU Dwg. No DCD-02-SW-ZZZ-DR-RAU-AR-1006 P03 S-1), for more detail.

Further to this, the *Construction Environmental Management Plan* (CEMP) provides a detailed overview of the construction phasing, as set out below.



**Figure 5.3: Extract from the CEMP prepared by BMCE showing the phasing strategy for the proposed development.**

Further to the above, the CEMP also confirms that the first phase of construction is envisaged to include the following:

- *Blocks 3, 7, 8, 9, 10* which comprise of 587 no. Units, a childcare facility; management suite; retail units; café and restaurant.
- The part of the Active Travel Route through the Phase one area (i.e., the section between Blocks 5 and 6 to Rosemount Green will be completed in Phase 2, when there is no longer an interface between construction traffic and that route).
- New vehicular entrance off Dundrum Road, and all roads, drainage and service infrastructure throughout the site.

We note that any direct works to the protected structures sit outside of the current Application boundary and will be subject to a future planning application. This is however addressed as part of the masterplan phasing. Refer to the *Masterplan Report* for details of further development to be subject to a future planning application and a further stage of construction.





Having regard to components included within the first phase of construction of this Application, we confirm that the delivery of key infrastructure, including vehicular, pedestrian and cyclist routes is prioritised in the early phases of development. Furthermore, the delivery of the majority of the social infrastructure will align with the delivery of the majority of the residential development, including Block 10 and the childcare facility.

Lastly, we confirm that all piped infrastructure and services will be delivered on a site wide basis as enabling works in the first phase of development. In addition to this, we note that the subject site is located in a well-established and serviced urban area, which benefits from a wide range of social infrastructure and amenities, including schools, local retail and sports facilities. In our opinion the proposed phasing strategy accords with Section 12.3.4.4 of the Development Plan.

### 5.2.36 Management Companies and Taking in Charge

Section 12.3.4.5 relates to requirements for taking in charge and requires the following:

*“If a development (or part thereof) is to be Taken in Charge by the Council the applicant shall agree, which areas are to be Taken in Charge, and this shall be clearly indicated on a site layout plan. All areas not to be Taken in Charge by the Council, shall also be clearly indicated on a site layout plan, and shall be maintained and the responsibility of a properly constituted Private Management Company. These details shall be submitted with the planning application.”*

We confirm full compliance and refer to the enclosed Taking in Charge drawing prepared by RAU.

### 5.2.37 Refuse Storage and Services

Section 12.3.4.7 requires the following:

*“Adequate refuse storage, recycling and composting areas, and future expansion of separated waste disposal for residential developments shall be adequately catered for. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents.*

*In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. (See also Appendix 6).”*

Refuse storage has been designed in consultation with AWN who have been appointed to provide the Waste Chapter of the EIAR. As part of this, we confirm that each apartment unit will have adequate storage provision to facilitate the recycling policy of DLRCC and each building will have access to their own respective bin store (including provision for non-residential uses).



We further confirm that waste areas are easily accessible for residents/ occupiers and refuse collectors. The waste storage facility will also be adequately ventilated to minimise odours and potential nuisance from vermin/flies and ensuring the avoidance of nuisance for habitable rooms above. Waste storage issues have been considered at the initial apartment design stage to ensure access for all, including people with disabilities. Sufficient access and egress is provided to enable receptacles to be moved easily from the storage area to an appropriate collection point within the site.

The proposed development therefore complies with the Development Plan in this regard.

### 5.2.38 Apartment Development

Section 12.3.5 onwards of the Development Plan applies to apartment development only. Refer to the *Housing Quality Assessment* prepared by Reddy A+U which demonstrates compliance with the relevant standards.

### 5.2.39 Dual Aspect in Apartments

Section 12.3.5.1 requires the following:

*“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.”*

Whilst we demonstrate that the subject site is located in a Central and/or Urban Accessible Location when considered in the context of the Apartment Guidelines, we confirm that the proposed development provides 50.2% dual aspect and therefore complies with this objective.

### 5.2.40 Separation Between Blocks

Section 12.3.5.2 of the Development Plan, states:

*“All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.*

*A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.”*

We note in regard to separation distances, the *Compact Settlement Guidelines 2024* include SPPR1 which requires that:

*“statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces”*

The proposed design strategy has sought to maximise separation distances between opposing windows to ensure a high standard of residential accommodation within the scheme and also mitigate adverse impact upon neighbouring development. There are however a number of instances where the separation distances between opposing windows, both within and outside of the development are reduced below 16m.

As detailed in Section 4.3 of this Report the scheme has been designed to ensure that the vast majority of the proposed units benefit from separation distances between proposed habitable rooms that accord with or exceed the 16 identified in SPPR1 of the *Compact Settlement Guidelines 2024*, which states:

*“When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.”*

Section 3.7 of the enclosed *Architectural Design Report* identifies separation distances between units, a limited number of which are less than 16m. For example, between certain sections of Block 2 (4, 6, 7 and 9m); at the northern end of Block 4 (12-14m); between the northern end of Block 6 and southern edge of Block 8; between certain sections of Block 7; and between certain sections of Block 10. However, in all these cases, where there are windows serving habitable rooms, these are not directly opposing each other but are staggered or at oblique angles, which provides suitable levels of privacy and prevents undue overlooking of habitable rooms and amenity spaces, as required by SPPR1.

In this context we also confirm that a full daylight and sunlight assessment of the proposed development is enclosed with this planning application.

The proposed development is considered to be acceptable in this regard (for the reasons expanded upon below), the design strategy which avoids directly opposing main windows of habitable spaces ensures that the proposed development does not give rise to unacceptable impact upon the proposed standard of accommodation or surrounding neighbouring amenity. The proposed development is also separated from adjoining residents by the large perimeter wall which prevents a direct visual relationship between ground floor units inside and outside the scheme. The results of the daylight, sunlight and overshadowing assessments are considered to evidence the above position. The enclosed *Daylight and Sunlight – Internal Daylight and Sunlight Report and Overshadowing Assessment*, prepared by GIA, concludes that “the achieved levels of daylight and sunlight are overall excellent for a scheme of this nature. As such, we consider that the Proposed Development will provide future residents with very good daylight and sunlight amenity.” Refer to Section 5 of the *Daylight and Sunlight Internal Daylight, Sunlight and Overshadowing Report* and Appendix A of this Report for more detail of compensatory measures for units that do not meet the target values.

Again it is emphasised that the BRE Guidelines do not provide mandatory target values and that national Guidelines, such as the Compact Settlement Guidelines 2024 acknowledge that Planning Authorities must weigh up the overall quality of the design and layout of the scheme.

#### 5.2.41 Internal Storage and External Storage

Section 12.3.5.3 contains Table 12.3 which outlines the minimum storage space requirements for apartment development.

| Minimum Requirements            |
|---------------------------------|
| One Bedroom 3 sq.m.             |
| Two Bedroom (3 person) 5 sq. m. |
| Two Bedroom (4 person) 6 sq. m. |
| Three Bedroom 9 sq.m.           |

**Figure 5.4: Extract from Table 12.3 of the Development Plan showing minimum storage space requirements.**

It further advises “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.”

We confirm that the proposed development complies with the internal apartment storage requirement, refer to the *Housing Quality Assessment Report* for full in respect of each apartment unit. The *Housing Quality Assessment Report* demonstrates that 313 no. apartments or 33% of the units, the internal storage spaces exceed the minimum standard by at least 10%.

In relation to the provision of bulky storage outside of apartments, we note this is not a requirement of the *Apartment Guidelines, 2024*. Furthermore, the Development Plan uses the term ‘should’ in respect of the provision of external stores, which in our opinion does not indicate it is a mandatory requirement.

The provision of such stores at Basement or Lower Ground Level would likely displace waste stores, cycle parking and/or car parking to surface level which would be detrimental to the visual quality of the scheme within this sensitive site. The provision of additional storage at the Ground Level of buildings would potentially increase inactive frontages in a scheme with extensive public and communal open spaces throughout the site which require passive surveillance. Thus, where a significant proportion of the apartments have generous internal storage areas and where provision is made across the site for large scale bicycles, the scheme is considered to provide adequate residential storage.

#### 5.2.42 Penthouse Development

Section 12.3.5.4 relates to penthouse development: *“which typically consists of high-quality roof level living accommodation in an apartment development”*. Where applicable, the following is required.

*“A penthouse level should have regard to the overall design of an apartment block and should be finished with high quality materials and not have a negative visual impact on the skyline and/or streetscape (refer also to the Building Height Strategy set out in Appendix 5).”*

The external design of the upper levels of the proposed Blocks is no different from the floors below, this design was considered to improve the appearance of the scheme, with a change in materials at the lowest level of the buildings. Having regard to the justification set out in respect of building height and quality in earlier sections of this Statement, we conclude that the upper levels of the proposed development complies with Section 12.3.5.4 in this regard.

#### 5.2.43 Minimum Apartment Floor Areas

Section 12.3.5.5 states that all apartment developments shall accord with the minimum floor areas set out in the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities*.

We confirm that all of the proposed apartments meet or exceed the minimum standards, as detailed in Section 4.5 of this Report. Refer also to the *Housing Quality Assessment Report* for full details.

#### 5.2.44 Additional Apartment Design Requirements

Section 12.3.5.6 sets out the further requirement for the following:

- Ground level apartment floor to ceiling heights shall be a minimum of 2.7 metres;

- A maximum of 12 apartments per floor per core may be provided in apartment schemes.

We confirm that the proposed development provides minimum floor to ceiling heights of 2.7 metres. In terms of the number of apartments per floor, per core, the scheme generally complies with this requirement. For Blocks with larger floor plates, such as the eastern part of Block 7, there are 18 units per floor served by two separate cores and are thus compliant with the requirement.

#### 5.2.45 Transport

- Section 12.4.1 refers to Traffic Management and Road Safety with reference to DMURS, the 'Urban Design Manual - A Best Practice Guide 2009' the 'Apartment Guidelines 2023'. It notes the potential need for a Quality Audit for major developments.
- Section 12.4.2 relates to the need for *Traffic and Transportation Assessments* for larger schemes.
- Section 12.4.3 relates to Travel Plans to encourage sustainable travel infrastructure.
- Section 12.4.4 relates to Street Lighting.

We confirm that this planning application submission is supported by the following documents, all prepared by ILTP and EDC, which is consistent with the above Sections of the Development Plan and will inform the assessment of the Application:

- *Transport and Traffic Assessment (TTA)*
- *Travel Plan* (appended to the TTA)
- *DMURS Compatibility Statement*
- *Stage 1 Access and Walking Audit*
- *Stage 1 Road Safety Audit*
- *Public Lighting Report*

#### 5.2.46 Car Parking Standards

Section 12.4.5 refers to Council policy in respect to car parking standards. Section 12.4.5.1 outlines 'Parking Zones' whereby the County has been divided into four parking zones which are allocated via Map T2 of the Development Plan. A different set of parking standards are applied to each of the parking zones.

According to Map T2, the subject lands are considered to fall within Parking Zones 2 and 3 for Zone 2 and 3 locations, the parking requirements are 'standards' for residential and maximums for non-residential car parking.

### Residential Car Parking

The Figure below shows the Car Parking Zones and Standards, as extracted from Section 12.4.5.6.

| Land Use                                     |                  | Zone 1<br>MTC Areas and<br>Blackrock | Zone 2<br>Near Public<br>Transport | Zone 3<br>Remainder of<br>County<br>(non-rural) | Zone 4 Rural    |
|--|------------------|--------------------------------------|------------------------------------|---|-----------------|
| <b>Houses:</b>                               | <b>Criterion</b> | <b>Maximum</b>                       | <b>Standard</b>                    | <b>Standard</b>                                 | <b>Standard</b> |
| House 1 bed                                  | unit             | 1                                    | 1                                  | 1   | Case by case    |
| House 2 bed                                  | unit             | 1                                    | 1                                  | 1   | Case by case    |
| House 3 bed or more                          | unit             | 1                                    | 2                                  | 2   | Case by case    |
| <b>Apartments and<br/>Sheltered Housing:</b> |                  |                                      |                                    |   |                 |
| Apt 1 bed                                    | unit             | 1                                    | 1                                  | 1*  | Case by Case    |
| Apt 2 bed                                    | unit             | 1                                    | 1                                  | 1*  | Case by Case    |
| Apt 3 bed +                                  | unit             | 1                                    | 2                                  | 2*  | Case by Case    |

Figure 5.5: Extract from Table 12.5 'Car Parking Zones and Standards' contained within the Development Plan.

The proposed development provides the following car parking provision in respect of the residential component of the scheme. The table below compares the proposed provision with the Development Plan car parking standards. As noted above, the car parking requirements for zone 2 and zone 3 locations are 'standards' and therefore are generally required to be met to comply with the Development Plan.

Table 5.5: Proposed Residential Car Parking Provision in context of the Development Plan Requirements.

| Proposed Unit<br>Type/<br>Land<br>Use                              | Size/<br>No. of<br>Units | DLRCC Development<br>Plan Standards         | DLRCC<br>Parking<br>Requirement | Proposed Car<br>Parking<br>Provision |
|--|--------------------------|---|---------------------------------|--------------------------------------|
| <b>Apartments</b>  |                          |   |                                 |                                      |
| Apartment 1<br>bed   | 342                      | Zone 2 – 1 per unit<br>Zone 3 – 1 per unit* | 342                             | 51                                   |
| Apartment 2<br>bed   | 450                      | Zone 2 – 1 per unit<br>Zone 3 – 1 per unit* | 450                             | 203                                  |
| Apartment 3<br>bed +   | 142                      | Zone 2 – 2 per unit<br>Zone 3 – 2 per unit* | 284                             | 134                                  |
| <b>934</b>   | <b>934</b>               |   | <b>1,076</b>                    | <b>397</b>                           |
| Additional 15%<br>of Residential<br>Parking for<br>Visitor Parking |                          |   |                                 | 57                                   |
| 12 no Car<br>Share   |                          |   |                                 | 12                                   |





|   |            |  |  |            |
|---|------------|--|--|------------|
| <b>Total Residential Car Parking</b>        | <b>934</b> |  |  | <b>466</b> |
| <b>Total Residential Motorcycle Parking</b> |            |  |  | <b>57</b>  |

\* plus 1 in 10 visitor parking for apartments in Zone 3

Table 4.6 above demonstrates the allocation of residential car parking provision relative to the standards relating to Zone 2 and 3.

However, this proposed car parking provision is supported by Section 12.4.5.2 of the Development Plan, which provides for the deviation from the car parking standards (as addressed in further detail in the Table below.

**Table 5.6: Assessment of proposed development against Criteria for reduced car parking standards under Section 12.4.5.2 of the Development Plan**

| <b>Criteria for reduced car parking standards under Section 12.4.5.2 of the Development Plan</b> | <b>Justification surrounding compliance of the proposed development.</b>  |
|--|---|
| Proximity to public transport services and level of service and interchange available.           | <p>The subject site is located approx. 450m (less than 10 minute walk) from Luas Green Line Windy Arbour with services at 3-5 minute intervals during peak hours.</p> <p>It is also less than a 10-minute walk from Dublin Bus Routes on Dundrum Road, Bird Avenue, Taney Road, Dundrum Luas Interchange.</p>   |
| Walking and cycling accessibility/permeability and any improvement to same.                      | <p>The provision of the proposed new active travel route through the proposed development provides a strategic new link that significantly augments the existing and planned 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.</p> <p>Furthermore, with the implementation of the proposed internal infrastructure, the 15-minute walking catchment of the site 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, including to Windy Arbour LUAS Stop (see Figure 4.5 of the enclosed TTA prepared by ILTP).</p> |
| The need to safeguard investment in sustainable  | A <i>Mobility Management Plan</i> (MMP) prepared by ILTP is enclosed with this planning application as part of the TTA. The MMP   |



|  |   |
|--|---|
| transport and encourage a modal shift.   | proposes special measures to enable modal shift towards sustainable travel modes. As part of this, we note that the Applicant and their Agent, the LDA, 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.  |
| Availability of car sharing and bike / e-bike sharing facilities.  | As set out in Table 2.6 above, the proposed development includes provision for a Car Share scheme.<br><br>The proposed development also provides for cargo bikes.<br><br>In terms of bicycle share facilities, the enclosed MMP identifies that facilities including on-site cycle hire provision (e.g. through Bleeper Bikes, or similar) could be provided. Such facilities are not proposed as part of the scheme at this stage due to the reliance on third party providers. As public bodies DLRCC and the LDA are required to tender such service and are therefore precluded from obtaining commitment from providers at this early stage, prior to following proper procurement procedures. |
| Existing availability of parking and its potential for dual use.   | The existing parking at the site is associated with the former use of the site as the Central Mental Hospital. All parking associated with the former use, within the site boundary, will be discontinued as a result of the proposed development and will therefore no longer exist.<br><br>The proposed parking strategy does however provide for the dual use of commercial car parking for residential parking at night, outside of commercial hours.   |
| Particular nature, scale and characteristics of the proposed development (as noted above deviations may be more appropriate for smaller infill proposals). | The internal street layout and the provision of cycle and pedestrian connectivity through the site will further promote sustainable travel patterns for both the existing and new community.<br><br>The allocation of car parking is also proposed to prioritise the larger units to address potential greater need in respect of car ownership.  |
| The range of services available within the area.   | The proposed development will include for a variety of local facilities, which means that many services will be available within the development and within a short walk of the new residential development proposed. This will reduce the need to travel and also encourage more people to use local facilities.   |
| Impact on traffic safety and the amenities of the area.  | Refer to the <i>Traffic and Transport Assessment (TTA)</i> , <i>DMURS Compatibility Statement</i> , <i>Stage 1 Access and Walking Audit</i> and <i>Stage 1 Road Safety Audit</i> for full details in this regard. The relevant assessments conclude that the proposed development, from a traffic perspective, would not have an unacceptable adverse impact upon the receiving environment.  |
| Capacity of the surrounding road network.  | Refer to the <i>Traffic and Transport Assessment (TTA)</i> which concludes that the proposed development would not have a significant adverse impact on the surrounding area.   |
| Urban design, regeneration and civic benefits including street vibrancy.   | The proposed development brings a currently insular site into active use, including a number of pedestrian and cyclist links that connect it to the surrounding residential areas. As a former high security mental health facility, the site is currently inaccessible to the public and surrounded by a 4-5m high perimeter wall. As well as making a significant contribution to the delivery of housing in line with national policy objectives, the proposed development   |



|   |  |
|---|--|
|   | enhances the Dundrum Area from a placemaking and regeneration perspective in accordance with the DLAP. The proposed development will deliver significant civic benefits, including a significant quantum of public open space, community facilities, local facilities and high-quality housing which will contribute to the overall vibrancy and quality of Dundrum as a place to live. Furthermore, the proposal includes the removal of sections of perimeter wall at both Dundrum Road and adjacent to Rosemount Green to the south of the site. This is considered to greatly enhance the relationship between the subject lands and the surrounding public realm, providing increased permeability and resultant movement of people, an enhanced network of community facilities and spaces and increased active frontage and natural surveillance. |
| Robustness of Mobility Management Plan to support the development.  | A robust Mobility Management Plan has been prepared by ILTP as part of the enclosed TTA.   |
| The availability of on street parking controls in the immediate vicinity.   | Parking controls are limited in the surrounding area despite the sports facility at Rosemont Green and the locality's proximity to Windy Arbour LUAS. It is considered that the proposed development will not generate the need for increase on street parking controls.   |
| Any specific sustainability measures being implemented including but not limited to:<br>- The provision of bespoke public transport services.<br>- The provision of bespoke mobility interventions.   | The proposed development is located in proximity to high quality public transport provision, which is improving further with the roll out of the BusConnects project.<br><br>As noted above, the proposed development provides for a significant improvement to pedestrian and cyclist permeability in the area, significantly increasing the area that falls within the walking catchment of the Windy Arbour LUAS Stop.  |
| Where a development site is located on the boundary of two or more parking zones, the level of parking provision will be decided at the discretion of the Planning Authority having regard to the criteria set out above. In Zones 1 and 2, where a deviation from the parking standards set out in Table 12.5 is being proposed, the applicant should engage with the Council at pre-planning stage regarding the acceptability of the proposal. | The site is within Zones 2 and 3 for the purposes of calculating car parking. The DL RCC Transportation Section was consulted in preparing this planning application, which was also informed by the assessments and engagement undertaken as part of the previous SHD Application for the subject site.   |

Having regard to the above, we conclude that the proposed car parking provision is acceptable in the context of Section 12.4.5.2 of the Development Plan, which provides for the deviation from the car parking standards in certain circumstances.



### Non-Residential Car Parking Provision

| Land Use  |   | Zone 1<br>MTC Areas and<br>Blackrock | Zone 2<br>Near Public<br>Transport | Zone 3<br>Remainder of<br>County<br>(non-rural) | Zone 4 Rural   |
|---|---|--------------------------------------|------------------------------------|---|----------------|
| <b>Other Uses</b>                                       | <b>Criterion</b>  | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| Caravan Park  | stand   | n/a                                  | n/a                                | 1   | 1              |
| Hotel/Aparthotel etc                                    | bedroom   | 1 per 3 rooms                        | 1 per 2 rooms                      | 1 per room                                      | n/a            |
| Student Hostel /<br>Accommodation                       | bed space   | 1 per 20                             | 1 per 15                           | 1 per 10  | n/a            |
| <b>Education:</b>                                       | <b>Criterion</b>  | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| All Schools   | classroom<br>(excluding<br>resource<br>or ancillary<br>rooms) | 1                                    | 1                                  | 2   | 2              |
| Childcare   | GFA (including<br>set down)                                   | 1 per 80                             | 1 per 60                           | 1 per 40  | 1 per 40       |
| Third Level   |   | case by case                         | case by case                       | case by case                                    | n/a            |
| <b>Retail:</b>  | <b>Criterion</b>  | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| Retail Conv >1000<br>sqm (supermarket)                  | GFA   | 1 per 60                             | 1 per 30                           | 1 per 20  | n/a            |
| Retail Conv > 100sqm                                    | GFA   | 1 per 60                             | 1 per 40                           | 1 per 30  | n/a            |
| Retail Conv < 100sqm                                    | GFA   | none                                 | none                               | 1 per 30  | n/a            |
| Retail / Financial<br>Services < 100sqm<br>(standalone) | GFA   | none                                 | none                               | 1 per 50  | n/a            |
| Retail / Financial<br>Services > 100sqm                 | GFA   | 1 per 200                            | 1 per 150                          | 1 per 100                                       |                |
| Retail Comp   | GFA   | 1 per 200                            | 1 per 100                          | 1 per 50  | n/a            |
| Retail Warehouse  | GFA   | 1 per 100                            | 1 per 50                           | 1 per 50  | n/a            |
| <b>Employment:</b>                                      | <b>Criterion</b>  | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| Offices, Businesses,<br>Professional                    | GFA   | 1 per 200                            | 1 per 150                          | 1 per 100                                       | n/a            |
| Science and<br>Technology based<br>industry             | GFA   | 1 per 200                            | 1 per 150                          | 1 per 100                                       | n/a            |
| Industry General /<br>Manufacturing                     | GFA   | 1 per 300                            | 1 per 200                          | 1 per 100                                       | n/a            |



| Land Use  |                  | Zone 1<br>MTC Areas and<br>Blackrock | Zone 2<br>Near Public<br>Transport | Zone 3<br>Remainder of<br>County<br>(non-rural) | Zone 4 Rural   |
|---|------------------|--------------------------------------|------------------------------------|---|----------------|
| <b>Leisure:</b>                                     | <b>Criterion</b> | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| Theatre, Cinema, Auditorium / Conf                  | Seat             | 1 per 50                             | 1 per 25                           | 1 per 20  | n/a            |
| Restaurant, Café, Bar, Lounge < 100sqm (standalone) | GFA              | none                                 | none                               | 1 per 30  | 1 per 25       |
| Restaurant, Café, Bar, Lounge > 100sqm              | GFA              | 1 per 100                            | 1 per 50                           | 1 per 30  | 1 per 25       |
| <b>Community:</b>                                   | <b>Criterion</b> | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| Community facility, library, museum, art gallery    | GFA              | 1 per 150                            | 1 per 100                          | 1 per 50  | 1 per 50       |
| Place of Worship<br>Place of Public Worship         | Seat             | 1 per 50                             | 1 per 20                           | 1 per 10  | 1 per 5        |
| Medical facility                                    | Consulting Room  | 1                                    | 2                                  | 2   | n/a            |
| Hospital  | GFA              | 1 per 100                            | 1 per 75                           | 1 per 50  | 1 per 50       |
| Residential Institution                             | Bed              | 1 per 3                              | 1 per 2                            | 1 per 2   | 1 per 4        |
| Funeral Home  | parlour          | 4                                    | 4                                  | 5   | n/a            |
| <b>Sport:</b>                                       | <b>Criterion</b> | <b>Maximum</b>                       | <b>Maximum</b>                     | <b>Maximum</b>                                  | <b>Maximum</b> |
| Golf Course   | Hole             | n/a                                  | n/a                                | n/a   | 6              |
| Pitch and Putt                                      | Hole             | n/a                                  | n/a                                | 3   | 4              |
| Gym / Sports Club                                   | GFA              | 1 per 100                            | 1 per 75                           | 1 per 50  | n/a            |
| Sports Grounds / Sport related                      |                  | case by case                         | case by case                       | case by case                                    | case by case   |

Figure 5.6: Extract of Table 12.6 of the Development Plan.

The proposed development provides the following car parking provision in respect of the non-residential component of the scheme. The non-residential parking requirements to 'maximums'. The proposed non-residential car parking complies with the Development Plan.

Table 5.7: Proposed Non-Residential Car Parking Provision in context of the Development Plan Requirements.

| Proposed Unit Type/ Land Use           | Size/ No. of Units | DLRCC Development Plan (maximums)                                | DLRCC Development Plan requirement | Proposed Car Parking Provision |
|--|--------------------|--|------------------------------------|--------------------------------|
| Café (<100 sq m)                       | 78 sq m            | Zone 2 – (None)<br>Zone 3 – 1 per 30 sq m                        | 0<br>(use located in Zone 2)       | 0                              |
| Medical (up to 6 no. consulting rooms) | 288 sq m           | Zone 2 – 2 per consulting room<br>Zone 3 – 2 per consulting room | 12<br>(use located in Zone 3)      | 7                              |
| Restaurant                             | 266 sq m           | Zone 2 – 1 per 50 sq m<br>Zone 3 – 1 per 30 sq m                 | 9<br>(use located in Zone 3)       | 5                              |



|   |            |   |  |  |
|---|------------|---|--|--|
| <b>Retail (Blocks 03 and 07)</b>          | 1,160 sq m | Zone 2 – 1 per 40<br>Zone 3 – 1 per 30  | 38<br>(use located in Zone 3)                                      | <b>19</b>  |
| <b>Community</b>                          | 1,749 sq m | Zone 2 – 1 per 100<br>Zone 3 – 1 per 50 | 34<br>(use located in Zone 3)                                      | <b>16</b>  |
| <b>Creche</b>                             | 716 sq m   | Zone 2 – 1 per 60<br>Zone 3 – 1 per 40  | 12<br>(use located on edge of Zone 2)<br>(or<br>18<br>(for zone 3) | <b>11 (comprises 6 no. staff spaces and 5 drop off at surface level)</b> |
| <b>Total Non-Residential Parking</b>      |            |   | 105 (or 111)   | <b>58</b>  |
| <b>Non-Residential Motorcycle Parking</b> |            | 4 per 100 spaces                        |  | <b>22</b>  |

In summary, the proposed development provides 524 No. car parking spaces (466 no. residential spaces and 58 no. non-residential spaces). The enclosed *Traffic and Transport Assessment* prepared by ILTP also addresses the proposed car parking provision.

In addition to the spaces referred to above, the proposed development includes a minimum of 1 fully equipped Electric Vehicle (EV) charging space per 5 spaces proposed. Provision will be made for all spaces to be EV compatible in the future. Furthermore, a total of 79 no. motorcycle spaces are proposed (6% of the number of residential units within the development, plus additional for the non-residential). Car share schemes, such as Go Car, will also be provided. Some 38 no. Accessible Parking Spaces are provided across the site, at a rate of 7.2% of the total number. Refer to Dwg. No. DCD-02-SW-ZZZ-DR-RAU-AR-1010 for full details of car parking provision.

As also noted within the enclosed *Traffic and Transport Assessment*, the proposed car parking provision provides an overall reduced car parking ratio of an average of 0.5 spaces per residential unit (including visitor parking and car share spaces, but excluding non-residential spaces). This aligns with the Applicant's commitment to deliver low carbon development with an emphasis on sustainable modes of travel and reduced private car dependency, as required by the strategic objectives of the National Planning Framework and is supported by the Development Plan.

As set out previously in relation to density, the application site is well located in close proximity to high frequency public transport and within easy walking distance of Dundrum Town Centre and Dundrum Business Park, both significant employment locations. The proposed car parking provision (as demonstrated in the *Traffic and Transport Assessment*) has been allocated by unit type to ensure that parking is an option for potential occupiers (for example, families) with a wider range of travel needs and destinations. The proposed development is also supported by a *Mobility Management Plan* to ensure that a modal shift towards sustainable transport is supported by appropriate measures and realised. The



scheme provides a range of commercial and community facilities such that residents will not need to travel distances to access many services, thus decreasing demand for car ownership.

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 Section 12.4.5.2 of the Development Plan which provides for reduced car parking standards.

### 5.2.47 Parking and Loading Bays

Section 12.4.5.7 requires the following:

*“In general, parking bays shall be a minimum 2.4 metres in width and 4.8 metres in length - with increased dimensions required for short-stay retail parking spaces and loading/set down parking areas. The configuration whereby double parking bays are placed length to length is discouraged. Carparking dimensions for in curtilage parking is set out in Section 12.4.8.1 (5.5 metres x 3 metres minimum). Parking bay widths suitable for people with disabilities shall be a minimum of 2.4 metres wide – with a 1.2 metres buffer on both sides - and 6.0 metres in depth.*

*Parking bay widths suitable for parent and child parking shall be a minimum of 3.3 metres wide, or 5.7 metres if paired with 0.9 metres hatching between the parking spaces.*

*Parking bays for people with disabilities or parent and child shall be located on firm, level ground, preferably at ground floor level, be in close proximity to access points/lifts and avoid potential conflict points such as ramps, steps etc. All parking bays should be in accordance with Part M of the Building Regulations. The location of disability or parent and child parking bays should be highlighted as part of pre-planning discussions.*

*Where there is a need for loading and unloading in a development, additional parking bays suitable for loading should be provided in addition to the parking requirements set out in Table 12.5. Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. Loading bays shall be situated so as to minimise traffic hazard, reduce distance to carry goods and encourage its use for home deliveries. This standard may be relaxed if the planning authority consider it is appropriate based on the location and the nature/design of both the street and the residential development.”*

We confirm compliance with the measurements and dimensions in respect of car parking bays referred to above.

In terms of loading bays, the proposed development provides 4 no. flexible loading bays, at Block 2, between Blocks 4 and 5, and to the south of Blocks 3 and 7. We note that this falls short of the above policy requirement to provide 1 no. loading bay per 100 units in large developments. In our opinion, the design of the street layout and provision of ample visitor car parking spaces would facilitate home deliveries without the provision of further loading

bays. As the proposed development comprises of social and affordable housing it will not be subject to the same turnover of occupants and households that a similar sized development with a significant proportion of privately rented units would experience.

#### 5.2.48 Cycle Parking

The importance of bicycle parking is outlined in Section 12.4.6, which notes the requirement for the provision of bicycle parking to accord with ‘*Standards for Cycle Parking and Associated Cycling Facilities for New Developments*’ (2018) or any subsequent review of these standards, as published by Dún Laoghaire-Rathdown County Council. The Development Plan notes that within zones 1 and 2, the minimum standards set out in this policy document should be exceeded.

The Development Plan outlines the following considerations for bicycle parking within residential developments (of 5 units or more) (Section 12.4.6.2):

- *“Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of oversized formats (cargo bikes etc)?*
- *Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- *Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- *Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- *Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?”*

Secure long-term cycle parking is required for a development of this scale, and this cycle parking must be covered and ‘*conveniently located within 50 metres of the destination and located near building access points where possible*’. There is also a requirement for new larger developments to provide cycle route links to the existing cycle network, alongside internal cycle permeability. It is further noted that for residential developments of this scale, the Plan states that a Cycle Audit may be required.

Full details of the proposed cycle parking provision are set out in Section 5.8 of the *Traffic and Transport Assessment* and on RAU Dwg. No. DCD-02-SW\_L01-DR-RAU-AR-1013. We confirm that from a quantum perspective, the proposed provision aligns with the Apartment Guidelines and therefore comprises 1 space per bed space. The total residential cycle parking provision will therefore be 1,850 no. long stay spaces and 488 no. short stay spaces (a total of 2,338 no. spaces), plus 29 no. cargo bike spaces.

In terms of wider cycle facilities, refer to the *Housing Quality Assessment Report* which provides details of the proposed cycle facilities, demonstrating compliance with the Council’s cycle standards.

Furthermore, we highlight the provision of cycle routes across the development and connections into surrounding lands. The cycle infrastructure proposed supports a modal shift

towards sustainable modes of transports and reduced car dependency. The proposed development is therefore considered to comply with the policy requirements in this regard.

The enclosed Stage 1 Access and Walking Audit considers cycle access for the proposed development.

#### 5.2.49 Motorcycle Parking

Section 12.4.7 requires the following:

*“It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council’s Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand.”*

The proposed development provides a total of 524 no. car parking spaces (including visitor and car share spaces) and 79 no. motorcycle spaces. We therefore confirm that the proposal exceeds the minimum motorcycle parking standard.

#### 5.2.50 ACAs/Protected Structures and Car Parking

Section 12.4.8 of the Development Plan relates to vehicular entrances to schemes, the proposed new junction has been designed according to best practice and has been subject to the enclosed Stage 1 Road Safety Audit and the Stage 1 Access and Walking Audit.

Section 12.4.8.4 seeks to protect boundary features such as walls, railings and gardens contribute to character and setting of Protected Structures in the context of the provision of off-street car parking.

We confirm that the proposed development interacts sensitively with the protected structures which form part of the wider site. The car parking proposals would not detrimentally affect the heritage buildings themselves. A number of alterations are proposed to the perimeter wall to provide for enhanced access for vehicles, pedestrians and cyclists, nevertheless, as demonstrated throughout the submission, the proposed alterations to the perimeter wall have been approached sensitively and do not result in significant harm to the curtilage or setting of the protected structures. We therefore consider the proposal to be acceptable in the context of this policy requirement.

#### 5.2.51 Emergency Access

Section 12.4.13 states the following:

*“In some circumstances large-scale developments, which could result in a significant level of peak and/ or off-peak travel, and residential developments greater than 300 units shall provide for duplicate access or other means approved by the Planning Authority for emergency use/access. This shall also allow access for pedestrians and*

*cyclists. The Councils Transportation Section will ascertain whether an additional access is required. This will be dealt with on a case-by-case basis through the pre-planning process.”*

The proposed development comprises a new vehicular access point to Dundrum Road, and the existing entrance at Dundrum Road will be available for emergency vehicles, both entrances will be available to pedestrian and cyclists. The proposal therefore complies with the above.

### 5.2.52 Access Across Public Open Space

Section 12.4.8.6 states the following:

*“The Planning Authority will not normally grant permission for a development which requires or entails vehicular access over public open space or a non-paved route. The applicant would be required to clearly indicate the necessary right of way or entitlement to carry out the proposed works.”*

The proposed development provides a number of openings within the boundary wall to enable permeability and connectivity with the surrounding area. The proposed works do not conflict with this policy requirement.

We do note that the introduction of openings at the boundary wall will facilitate the movement of pedestrians across a non-paved route (Rosemount Green, a public open space) into the proposed development site.

For the avoidance of doubt, no vehicular access across public open space or a non-paved route outside of the site boundary is proposed. We therefore confirm no conflicts with this policy.

### 5.2.53 Design of Underground or Multi-Storey Car Parks

Section 12.4.9 states sets out a number of design requirements in respect of multi-storey or underground car parks.

The majority of the car parking is provided by way of podium parking/ at half-basement level, with basements proposed only at Blocks 3 and 4.

The underground car parks are designed to appropriate standards and will be well lit with security provided by the onsite estate management office.

One way traffic is provided for within the car parks and cul de sacs avoided, and the basement car parks do not discharge directly to any main roads. Head room is provided for higher mobility vehicles and cyclist access. No one-way signalised car park access/egress is proposed. Water drainage has been considered in the design of the car park areas.

It is confirmed that the car parks will be well-lit in line with Building Regulations: Technical Guidance Document M (2022) and fully accessible to all users by ramp or lift.

### 5.2.54 Childcare Facilities – Parking/ Access

Section 12.4.10 states the following:

*“All pedestrian routes leading to a childcare facility from any parking area, play area, or nearby road and footpath shall be suitably designed to meet specified accessibility requirements in accordance with Part M of the Building Regulations. Car parking standards for childcare facilities are set out in the table 12.5 above. Cycle parking standards are set out in the ‘Council Cycle Standards’ (2018).*

*For new childcare facilities, the availability of existing on-street car parking spaces and any parttime hours of operation will be considered as part of the Development Management process.”*

The proposed childcare facility has been designed in accordance with Section 2 Premises and Facilities of the Tusla (2018) *Quality and Regulatory Framework: Full Day Care Service and Part-Time Day Care Service*. It is estimated that there would be approximately 25 no. members of staff on site. Dedicated car parking and cycle parking is allocated to the childcare facility. Further to this, we note that the access routes have been designed in accordance with the relevant building regulations (Part M). The proposed car parking is detailed in the TTA which confirms that 11 no. spaces in total are provided for the proposed childcare facility, which allows for staff parking and set down (6 no. spaces for staff, and 5 no. drop off spaces at surface level). Cycle parking has also been provided in excess of the relevant standards (20 no. short stay spaces and 18 no. long stay spaces). We therefore confirm compliance with this policy requirement.

### 5.2.55 Electrically Operated Vehicles

Section 12.4.11 requires the following:

*“To encourage the use of Electric Vehicles (EV), in line with Council, National Policy and Standards, developments shall provide at minimum EV Charging points and infrastructure as follows:*

- *Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces) - a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.*
- *New dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation at a later stage of a recharging point for EVs.*
- *Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments,) – provide at least 1 recharging point. and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.*
- *Developments with publicly accessible spaces (e.g. supermarket car park, cinema etc.) - provide at least 1 recharging point and a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point.”*



The proposed development provides Electric Vehicle Charging points at a rate of 1 per 5 parking spaces (i.e. 106 No. spaces are equipped with a fully functional EV charging point) See RAU drawing No. DCD-02-SW-ZZZ-DR-RAU-AR-1010. We further confirm that all residential car parking spaces are provided with ducting to allow the provision of future EV charging. The proposed development therefore complies with the Development Plan in this regard.

### 5.2.56 Retail Development

### 5.2.57 Assessment of Retail Proposals

Section 12.6.1 of the Development Plan provides for the assessment of retail development proposals. While the proposed development includes a number of small retail units, we highlight that they have been proposed in order to provide for the development which will introduce a significant number of new people to the area.

On this basis, it is not envisaged that the proposed retail units will serve a wider area or conflict with established retail provision. It is also noted that the type of retail provision proposed aligns with the land zoning objective which lists 'Shop-Neighbourhood' as Open for Consideration. We therefore conclude that the proposed development will not conflict with Section 12.6.1 of the Development Plan.

### 5.2.58 Convenience Shop

Section 12.6.3 of the Development Plan states the following:

*"A small/local convenience shop will be open for consideration within a residential area (lands zoned Objective 'A' – "To provide residential development and improve residential amenity while protecting the existing residential amenities"). When assessing any such proposals, the Council will have regard to the distance from the proposed development to established local shopping facilities and to its impact on the amenity of adjoining dwellings. Local convenience shops shall not have a floorspace greater than 100 sq.m. net. (refer also to Policy RET8, Section 7.5.5.1)."*

As stated above, the proposal includes a number of small retail units to serve the development, sized between 275 sq m, 280 sq m and 513 sq m. The proposed retail provision is considered to align with the land zoning objective which lists 'Shop-Neighbourhood' as Open for Consideration. 'Shop-Neighbourhood' is defined as:

*"A neighbourhood shop is one which primarily serves a local community and does not generally attract business from outside that community. They will primarily serve a 'walk-in' population and will typically have limited carparking."*

We confirm that this reflects the scale and nature of the proposed retail units.

Whilst no definition is provided in respect of Shop-Neighbourhood, we note from the definition of 'Shop-Major Convenience' that convenience goods are listed as: "Convenience



*goods would include: food, alcoholic and non-alcoholic beverages, tobacco and non-durable household goods.”*

On this basis, we confirm that the retail units within the scheme are not proposed as convenience stores as per the above definition, rather small-scale neighbourhood shops that will serve the new community. The 100 sq m is therefore not considered to apply. The occupiers of the proposed retail units have not yet been secured and will be secured in line with relevant policy provisions.

### 5.2.59 Fast Food Outlets/ Takeaway/ Restaurants

Section 12.6.5 contains a number of policy considerations mainly in respect of Restaurants/fast-food outlets/takeaways. Including:

- *“The need to retain, protect and strengthen the retail overall variety, and multi-use function of the area.*
- *The adequacy of existing facilities for the sale of hot food for consumption off the premises in the locality. In this regard, the applicant shall submit details of all existing fast food/takeaway outlets within the locality.*
- *The cumulative effect of the proposed development on the amenities of the area, particularly so in predominantly residential zoned locales.*
- *The effect of the proposed development on the existing mix of land uses and activities in the area.*
- *Careful consideration of the location of fast food outlets in the vicinity of schools and parks.*
- *Location of vents and other external services and their impact on adjoining amenities in terms of noise/smell/visual impact.*
- *Fast food outlets/takeaways with proposed drive- through facilities will generally only be acceptable within Major Town Centres or District Centres and will be assessed on a case-by-case basis.*
- *The proliferation or oversupply of certain premises that cause or are likely to cause disturbance or nuisance, detract from amenities or seriously detract from an area generally in terms of use and services mix may be resisted.*
- *Hours of operation.”*

In this regard, we confirm that the proposed restaurant unit is integrated at the ground floor of a residential apartment block and approximately 266 sq m in scale.

The proposed unit, along with the other non-residential uses proposed, is designed to serve the local population and will complement existing commercial uses in the surrounding area. The restaurant unit will serve to further activate the urban plaza between Blocks 3 and 7 in the centre of the site.

Whilst an end occupant has not been identified, the operation of the unit will be managed in the context of the wider residential development. The unit has been designed to ensure compatibility with the adjacent residential development and are therefore not expected to



give rise to adverse impacts on neighbouring amenity. The proposed restaurant unit has also been considered from a noise and traffic perspective in the EIAR and TTA. In our view, the proposed development is acceptable in this regard.

### 5.2.60 Green Infrastructure

Section 12.7 contains the Council's policies in respect to Green Infrastructure, including biodiversity and sensitive landscapes.

### 5.2.61 Biodiversity

Section 12.7.2 relates to Biodiversity and sets out Council policy in respect of the protection and enhancement of the environment from an ecological perspective.

In this regard, we confirm that the planning application is supported by a full Environmental Impact Assessment Report, including a Biodiversity Chapter, and a Natura Impact Statement, which fully assess the potential ecological/ biodiversity impacts of the proposal.

We further note that significant biodiversity enhancements are incorporated into the landscaping proposal including extensive SuDS proposals and the Elm Park Eco Corridor which 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 increased 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 including bird and mammalian nest boxes and open bonded brickwork to allow for bat roosting.

Lastly, the application is also supported by a *Habitat Management Plan*, prepared by Altemar Ltd., which ensures 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 habitats of existing mammals are also supported on site, particularly with regard to Badgers.

We therefore confirm full compliance with Section 12.7.2 and 12.8.6.1 of the Development Plan.

### 5.2.62 Sensitive Landscape and Site Features

Section 12.7.3 requires the following:

*"To protect and enhance the character and amenities of the County's rural or sensitive open areas, all new developments of any scale shall incorporate high quality landscape design and shall ensure that:*

- *Existing site features such as specimen trees, stands of mature trees, hedgerows, rock outcrops and water features are properly identified and*

*retained where appropriate and new planting or other landscaping appropriate to the character of the area will be provided.*

- *Existing significant on-site natural features must influence the layout.*
- *Developers should consult the Planning Authority at an early stage in relation to landscaping and planting proposals.*
- *Landscaping in new developments shall include planting of native Irish flora.*
- *Developers will be responsible for the grading, hard landscaping, planting, and further development of open space, including the provision of pedestrian paths and other facilities. Developers will be required to provide roadside trees, street planting and screen planting where necessary."*

The subject site consists of a number of important existing landscape features, including mature trees and open parkland which are retained as part of the landscape proposals. Whilst the proposed development gives rise to some tree loss, as addressed in detail in the *Arboricultural Impact Assessment*, the site layout has evolved following a landscape-led masterplanning process which sought to retain as much important mature trees as possible. Further to this, we confirm that the proposed development is supported by extensive landscape proposals which introduces significant new planting and habitat creation. We therefore confirm that the proposed development is compliant in this regard.

### 5.2.63 Open Space and Recreation

Section 12.8.1 of the Plan relates to Landscape Design Rationale. The Development Plan requires Applications to indicate how the overall approach is ecologically resilient and provides varied landscapes that reflect the character of the area.

The enclosed *Landscape Design Report*, prepared by AECOM, details the site's context, the analysis that informed the design and the proposed landscape character areas. The landscape was informed by biodiversity considerations as SUDs, and was development in collaboration with the design team particularly the project ecologist and project engineer.

A series of drawings are provided in conjunction with landscape specifications, prepared by AECOM, the scheme phasing is addressed in the enclosed *Construction and Environmental Management Plan* prepared by BMCE.

### 5.2.64 Public Open Space

Section 12.8.3.1 outlines the public open space requirements for residential developments, as contained in Table 12.8. It further states:

*"To qualify as public open space the area must be designed and located to be publicly accessible and useable by all in the County; generally free from attenuation measures; and capable of being taken in charge (i.e. must accord with the Council policy on taking in charge of open spaces)."*

| Location:  | Public Open Space Standards (minimum): |
|--|--|
| Residential Development in new residential communities as shown in the Core strategy – figure 2.9. | 15% (of site area)                     |
| Residential Development in the existing built up area.   | 15% (of site area)                     |
| Institutional and Redevelopment of SNI use   | 25% (of site area)                     |

**Figure 5.7: Public Open Space Requirements for residential developments as contained in Table 12.8 of the Development Plan.**

We further note the requirements set out in Section 12.8.5 ‘Public Open Space – Quality’.

The application site is subject to an INST objective due to its former institutional use and is therefore, in line with the above, required to provide 25% of the site area as public open space. In accordance with this, the proposed development provides c. 2.9 ha (c. 29,767 sq m) ‘public open space’, c. 30 % of the 9.6 ha site area. This significantly exceeds the minimum open space requirement of 25%.

We further confirm that the proposed public open space is fully accessible to the public and provides for a range of activities and users. The proposed development provides open space of exceptional quality and unlocks a significant quantum of urban greenery that is currently inaccessible to the public. Having regard to the above, we confirm that the proposed development complies with the Development Plan in this regard. Refer to the landscape proposals for further detail surrounding the quality of the public open space.

### 5.2.65 Communal Open Space

Section 12.8.3.2 sets out the communal open space requirements, as contained in Table 12.9. We note that the below space standards are also contained within the Apartment Guidelines.

This section also notes that communal open space should be for the exclusive use of the residents and should be an ‘*accessible, secure, and usable outdoor space*’.

| Unit Type            | Minimum Area per Unit |
|----------------------|-----------------------|
| Studio               | 4 sq. m               |
| One Bed              | 5 sq. m               |
| Two bedrooms (3 bed) | 6 sq. m               |
| Two bedrooms (4 bed) | 7 sq. m               |
| Three bedrooms       | 9 sq. m               |
| Four +               | 12 sq. m.             |

**Figure 5.8: Communal Open Space Requirements for residential developments as contained in Table 12.9 of the Development Plan.**

We further note the requirements of Section 12.8.5.3 ‘Communal Open Space – Quality’.

We confirm full compliance with the above standards, as detailed in the *Housing Quality Assessment*. We further confirm that the proposal includes communal space of a high quality and is fully accessible to the residents of the associated blocks. The spaces are primarily at podium level, with a roof level Communal Open Space for Block 6, and are therefore well overlooked and fully usable. Refer to the *Housing Quality Assessment Report* for further details.

### 5.2.66 Private Open Space for Apartment Developments

Section 12.8.3.3(ii) sets out the minimum space standards for apartment development, contained in Table 12.11. We note that the below space standards are also contained within the Apartment Guidelines.

| Type/No. of bedrooms | Minimum square metres |
|----------------------|-----------------------|
| Studio               | 4 sq. m.              |
| One                  | 5 sq. m.              |
| Two (3 persons)      | 6 sq. m.              |
| Two (4 persons)      | 7 sq. m.              |
| Three                | 9 sq. m.              |
| Four +               | 12 sq. m.             |

**Figure 5.9: Balconies/Winter Gardens: Minimum Private Open Space Requirements for Apartment Developments as contained in Table 12.11 of the Development Plan.**

We confirm full compliance with the above standards, as detailed in the *Housing Quality Assessment*.

### 5.2.67 Roof Gardens

Section 12.8.5.4 relates to roof gardens and states the following:

*“Consideration of the use of roof gardens as communal open space shall be on a case by case basis and will not normally be acceptable on a site where there is scope to provide communal open space at grade, as roof gardens do not provide the same standard of amenity particularly to young children. Consideration must also be given to the overall design, layout, and location of the roof garden, including its height. For larger apartment schemes in excess of 50 units no more than 30% of the communal open space shall be provided by way of a roof garden.”*

The proposed development includes only one communal open space roof garden at Block 6. The vast majority of the quantum of communal amenity space is located at podium level.

Block 6 benefits from proximity to the community facilities within Block 6 (by separate entrance) and it adjoins the southern public open spaces, which includes a playground, thus the residents of Block 6 are well served by a variety of amenities to serve different needs. We therefore conclude that the proposal complies with the above requirement.

### 5.2.68 SuDS (Sustainable Urban Drainage Systems) and Green Roofs/Blue Roofs

Section 12.8.6.2 relates to SuDS and states the following:

*“SuDS measures, such as attenuation storage systems, including detention basins that come into regular operation after rainfall events, shall not normally be included in the calculation of open space provision. Where a SuDS scheme provides biodiversity and amenity value and is readily accessible for either use or enjoyment in most weather conditions, a proportion of the SuDS area could be incorporated as a component part of the communal or public open space provision.”*

Section 12.8.6.3 relates to Green Roofs/ Blue Roofs and states the following:

*“The use of green roofs/blue roofs in accordance with the requirements of the Dún Laoghaire-Rathdown County Council’s Green Roof Policy, (See Appendix 7.2) forms part of an integrated approach to the provision of green infrastructure.”*

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 following measures are incorporated into the proposals:

- Intensive and Extensive Green Roofs
- Integrated Constructed Wetland
- Raingardens/ Bioretention Pits
- Permeable Surfacing
- Swale

Refer to the *Landscape Architecture Report* prepared by AECOM and the *Infrastructure Report*, prepared by Barrett Mahony Consulting Engineers, which details the SuDS proposals from a



drainage and stormwater management perspective. The two wetland areas north of the walled garden and to the east of Block 6 are excluded from the Public Open Space calculation. The enclosed *Habitat Management Plan* also has regard to the ongoing maintenance of the proposed green roofs and other measures.

We confirm that the proposed development complies in full with the relevant requirements in this regard.

## 5.2.69 Separation Distances

Section 12.8.7.1 sets out the following in relation to separation distances:

*“A minimum standard of 22 metres separation between directly opposing rear first floor windows should usually be observed, for new developments. This normally results in a minimum rear garden depth of 11 metres. However, this required rear garden depth may be prior to any domestic rear extensions, which may require planning permission or be exempted development being carried out. Adequate separation distances, between directly opposing rear first floor windows, should be provided when extending existing dwellings at first floor level, to ensure the retention of adjoining residential amenity. For single storey dwellings, a reduction in the rear garden depth may be considered, subject to the protection of adjoining residential amenity.*

*However, where sufficient alternative private open space (e.g. to the side) is available, the required separation distance for new developments may be reduced, subject to the maintenance of privacy and protection of adjoining residential amenities.*

*In all instances, private open space should not be unduly overshadowed and where there is the potential for the proposed development to overshadow or overlook existing/future development adjoining the site, minimum separation distances to boundaries should be increased.*

*In an exceptionally well-designed scheme providing an otherwise very high-quality living environment and that is in close proximity to existing public open spaces, the above standards may be relaxed.*

*Any relaxing of standards will be assessed on a case-by-case basis and should not be seen as setting a precedent for future development.”*

With references to ‘rear gardens’ and ‘extensions’ this section is understood to relate to conventional houses, whereas the proposed development provides for apartment blocks, but no conventional houses, so it is not considered applicable.

Separation distances have been considered in the context of SPPR1 of *Compact Settlement Guidelines 2024*, in Section 4.3 of this Report, which provides a justification where separation distances are reduced. As set out in Section 4.3, the windows of the proposed apartments all have a separation distance from windows of existing neighbouring buildings of more than 16m in accordance with SPPR1 (see Section 3.7 of the Architectural Design Report, which shows

that the separation distances are 63m to the north; between 23m and 106m to the east; between 27m and 70m to the south; and between 21m and 38m to the east).

The scheme has been designed to ensure that the vast majority of the proposed units benefit from separation distances between proposed habitable rooms that accord with SPPR1, which states:

*“When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.”*

Section 3.7 of the enclosed *Architectural Design Report* identifies separation distances between units, a limited number of which are less than 16m. For example, between certain sections of Block 2 (4, 6, 7 and 9m); at the northern end of Block 4 (12-14m); between the northern end of Block 6 and southern edge of Block 8 (14m); between certain sections of Block 7 (8-14m); and between certain sections of Block 10 (9-13m). However, in these cases, where there are windows serving habitable rooms, these are not directly opposing each other but are staggered or at oblique angles, which provides suitable levels of privacy and prevents undue overlooking of habitable rooms and amenity spaces, as required by SPPR1. Thus, the proposed development is considered consistent with the requirements of the *Compact Settlement Guidelines 2024* in this regard.

In our opinion, the proposed development is acceptable in this regard on the basis that reduced separation distances are mitigated by design and as the development delivers on the objectives of national planning policy surrounding compact growth and higher density development, whilst providing a high quality environment for both future residents and neighbouring residents.

### 5.2.70 Boundaries

Section 12.8.7.2 refers to boundary treatment, without providing detailed standards, it seeks to ensure the provision of adequate privacy between properties as well as achieving softer, more open boundary treatments.

The proposed development complies with this requirement and is detailed as part of the landscaping proposals, with privacy strips provided between windows or private open space and adjoining communal or public open space. Please also refer to the *Architectural Design Report* for details.

### 5.2.71 Play Facilities

Section 12.8.9 states the following:

*“Children’s play needs around the apartment building should include:*

- *Within the private open space associated with individual apartments.*
- *Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- *Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.”*

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 three designated playgrounds, two located to the north of the site (254 sq m and 195 sq m respectively) and one in the south of the site (371 sq m). Local play opportunities are provided for residents within the communal podium spaces. There are further multiple informal play opportunities throughout the site.

Having regard to the above, and the extensive quantum of open space proposed, we confirm that the proposed development complies with the above and provides significant opportunity for play in respect of a range of ages and activities, with an emphasis on nature based play, having regard to the character of the lands. Refer to the enclosed Landscape Design Report prepared by AECOM for more details.

## 5.2.72 Existing Trees and Hedgerows

Section 12.8.11 states the following:

*“New developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. New developments shall, also have regard to objectives to protect and preserve trees and woodlands (as identified on the County Development Plan Maps). The tree symbols on the maps may represent an individual tree or a cluster of trees and are not an absolute commitment to preservation. Decisions on preservation are made subject to full Arboricultural Assessment and having regard to other objectives of the Plan.”*

The existing landscape at the subject site is characterised by a significant number of large mature trees. As set out previously, the proposed development derives from a landscape-led masterplanning exercise, which was informed by consultation with the DLRCC Parks Department, as well as the requirements of the Dundrum LAP. This determined the sensitive and compatible arrangement of built form within an existing mature landscape. As a result, the proposed development maintains the open character of the lands, together with the incorporation of the distinct, mature and characterful landscape features such as the walled garden and mature trees.

The planning application submission is supported by a detailed *Arboricultural Assessment* which examines the entire Masterplan site. This Assessment concludes that 169 no. of the

307 no. trees assessed and included within the condition assessments are proposed for removal to facilitate the proposed development.

It will also be necessary to remove one tree line, 13 no. Hedges (and part of another), one Fruit Orchard and one shrub border. The majority of the trees proposed for removal (143 of 169) are Category C and Category U trees.

The Assessment further notes that the loss of the tree vegetation has been mitigated against as much as possible with the retention of a lot of the more prominent trees on these grounds and in particular the main groups of trees around the front of the existing buildings and on the entrance avenue which will help screen and blend the proposed development into its surrounds.

New tree planting is also proposed as part of the landscaping which will complement the development and its incorporation into the surrounding area. It will also help to provide good quality and sustainable long-term tree cover and as it establishes and grows in size, it will be continuously mitigating any negative impacts created with the loss of the existing tree vegetation to facilitate the proposed development.

We therefore conclude that the proposed development complies with the Development Plan in this regard.

### 5.2.73 Environmental Infrastructure

Section 12.9 of the Plan relates to Environmental Infrastructure and in particular discusses Air Pollution, Noise Pollution, Noise, Odour and Vibration, Construction Management, Hours of Construction, Waste Management, Telecoms, Light Pollution and Public Lighting.

In this regard, we note that unlike the majority Applications, this Part 10 Application is supported by a full *Environmental Impact Assessment Report* and *Natura Impact Statement* which provide detailed and robust assessment of any potential environmental impacts arising from the proposed development.

Section 12.9.1 Air Pollution, requires that the assessment of Applications has regard to air quality standards. Chapter 11 of the enclosed EIAR provides an assessment of the Air Quality, and details mitigation measures, which will inform the consenting authority's assessment in this regard.

Section 12.9.2 relates to development in locations with high pre-existing environmental sounds (such as close to major rail lines or roads) and noise generating developments, which may impact more sensitive existing developments. The site is not located in an area with any significant pre-existing noise sources. Chapter 13 Noise and Vibration of the EIAR provides assessment of noise and vibration and details a number of mitigation measures.

Section 12.9.3 relates to Noise, Odour and Vibrating Generating Uses. The proposed development is primarily a residential development proposed by DLRCC in partnership with the LDA. Whilst there are proposed supporting uses such as childcare, retail, restaurant and a community facility, these are integrated into the buildings from the outset and services such as vents will be subject to detailed design to prevent noise and odours to proposed residential



units. The Air Source Heat Pumps and associated infrastructure were assessed in the EIAR at Chapter 13 Noise and Vibration.

Section 12.9.4 of the Plan relates to Construction Management Plans and Section 12.9.5 refers to Hours of Construction. As noted above, this project has been subject to full EIAR, which provides mitigation measures for the construction phase where required; a *Traffic and Transportation Assessment* is also enclosed. A *Construction Environmental Management Plan* is also enclosed, it provides details surrounding the management of the construction process together with a number of mitigation measures to ensure that adverse environmental impact do not arise during the construction phase and hours of construction, the CEMP was informed by DLR Guidance in this regard. The Development Plan acknowledges that CEMPs are live documents that require future development: *“While construction management plans may be submitted at application stage the final Construction Management Plan is usually agreed by way of compliance condition as details such as location of compounds, construction traffic flow etc. are only finalised upon appointment of a contractor”*.

Section 12.9.6 relates to development management thresholds, again we note that in this case a full suite of assessments including an *Environmental Impact Assessment Report* is enclosed with the Application assessing all aspects of the environment.

Sections 12.9.7, 12.9.8 and 12.9.9 relate to commercial scale Waste Management Facilities; Telecoms Infrastructure, and Power Lines respectively. These Sections do not relate to the proposed development.

Section 12.9.10 refers to Public Lighting. Full public lighting proposals, prepared by EDC, are also enclosed with the Application documentation. These have been developed in consultation with Dún Laoghaire Rathdown County Council’s Lighting and Biodiversity Sections and with input from the project ecologist, having regard to impacts on bats and other fauna.

We conclude that the proposed development complies with the relevant policy requirements in this regard.

#### 5.2.74 Drainage and Water Supply

Section 12.10 states that all planning applications submitted shall clearly show existing and proposed water supply arrangements and surface and wastewater drainage proposals having due regard to SuDS.

Refer to Section 3 of the enclosed *Infrastructure Report* for full details of the engineering proposals, including SuDS proposals.

Section 12.10.1 has regard to ‘Flood Risk Management’ and states that:

*“Applications shall adhere to the policies and objectives set out in Appendix 15 Strategic Flood Risk Assessment and Section 10.7 Flood Risk while having regard to ‘the ‘Planning System and Flood Risk Management’ Guidelines for Planning Authorities’ DEHLG (2009) and DECLG Circular PL2/2014.”*

In this regard, we confirm Barrett Mahony Consulting Engineers have prepared the enclosed *Site Specific Flood Risk Assessment (FRA)*, in accordance with the requirements of the Guidelines. This Assessment concludes the developed site is shown not to be at a significant risk from flooding and to not create a significant risk to adjoining areas or downstream. Therefore, the development is deemed acceptable from a flood risk assessment perspective. Refer to the enclosed Assessment for further information.

### 5.2.75 Heritage

Section 12.11.1 relates to ‘Archaeological Heritage’. In this regard, we confirm that the planning application is supported by Chapter 16 of the EIAR which provides a full and detailed ‘Archaeology and Cultural Heritage’ assessment, supported by extensive archaeological survey work, including a geophysical survey and test trenching.

Section 12.11.2 relates to ‘Architectural Heritage – Protected Structures’. In this regard, we confirm that the proposed development does not propose works to the protected structures themselves but includes significant new development and changes to the landscape within the immediate setting and curtilage of the heritage buildings.

Section 12.11.2.3 specifically relates to ‘Development within the Grounds of a Protected Structure’ and states the following:

*“Any proposed development within the curtilage, attendant grounds, or in close proximity to a Protected Structure, has the potential to adversely affect its setting and amenity. The overall guiding principle will be an insistence on high quality in both materials, and design, which both respects and complement the Protected Structure, and its setting.*

*Any development must be consistent with conservation policies and the proper planning and sustainable development of the area. Considering recent changes to National Policy, (including the 20128 DHPLG, ‘Urban Development and Building Heights Guidelines for Planning Authorities’, a balance must be struck between allowing compact development, while protecting the Architectural heritage and historic building stock within the County...*

*All planning applications for development in proximity to a Protected Structure must be accompanied by a design statement, with supporting illustrative material, demonstrating how it has been developed having regard to the built heritage, topography, and landscape character of the site. An accredited conservation architect or equivalent should be engaged at the outset of the design process to assist in determining the appropriate siting of the development in order to minimise the impact on the Protected Structure. It may be of benefit to discuss specific requirements, at pre-planning stage.”*

Any potential impacts in this regard have been fully assessed as part of this application submission, refer to the following documents for full details:

- *Masterplan Report* prepared by Reddy A+U which provides an overview of the interface between all elements of the Masterplan scheme and the heritage buildings;





- Chapter 16 of the EIAR assesses Archaeological Heritage;
- Chapter 17 of the EIAR provides a full and detailed 'Architectural Heritage' assessment;
- *Historic Landscape Statement of Significance and Impact Assessment* prepared by Alastair Coey Architects;
- *Perimeter Wall Condition Report*, prepared by Alastair Coey Architects;
- *Gate Lodge Condition Report*, prepared by Reddy A+U.

Having regard to the above, we confirm the Application is consistent with the relevant assessment requirements contained at Section 12.11 of the Development Plan, which informed the Application and the associated Masterplan.

The design of the scheme was informed by a Masterplanning exercise and the site-specific requirements of the Dundrum Local Area Plan 2023, which considered the built heritage context of the site with input from a Conservation Architect.

In this case, due to the relocation of the Central Mental Hospital service to a modern purpose-built facility elsewhere, the 'do-nothing scenario' carries risks to the heritage receptors due to the absence of active management to preserve their physical condition and their significance and is contrary to planning policies that support the active use of sites in urban areas.

The proposed development is a high quality development that will deliver much need residential development at an urban infill site that is specifically identified in the Development Plan and the Local Area Plan as being suitable for residential development. The proposed development adheres to key design criteria detailed in the Local Area Plan providing for the appropriate development of the site including the provision of a significant area of public open space to the front of the main hospital building to separate it from the new buildings, the retention of mature trees across the site where possible, the retention of the walled garden as an open space, and the active reuse of the gate lodge. The removal of sections of the boundary wall provides for enhanced permeability which also accords with the requirements of the Local Area Plan.

### 5.3 Dundrum Local Area Plan 2023

The site is located within the Dundrum Local Area Plan (DLAP) boundary. The Local Area Plan sets out the policies and objectives to guide development in Dundrum and came into effect on 21<sup>st</sup> November 2023.

#### 5.3.1 Land Use and Character Area

Chapter 2 sets out the overall strategy for the built form in the within the local plan boundary. Section 2.3.2 identifies Character Areas relating to the site. The Former Central Mental Hospital (CMH) has been divided into two sub-character areas:

- “ a. The main hospital buildings complex (which also includes the nearby Chapel and former agricultural buildings),*
- b. The demesne, consisting of the open space character lands forming the majority of the site, together with the perimeter wall, gate lodge, walled garden, former agricultural buildings and other modern structures and landscape features within the grounds (see Chapter 8 for further details).”*

The site has also been identified as one of four Key Development Areas (KDAs) for the Dundrum Area.

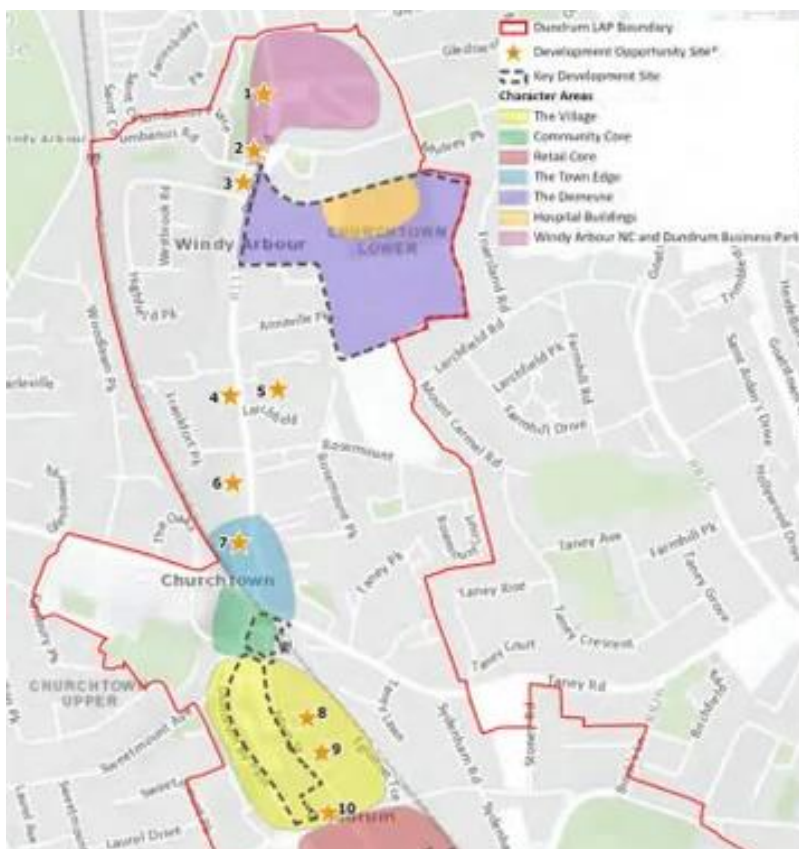


Figure 5.10: Opportunity Sites in Dundrum LAP. (Source: DLAP, 2023.)

### 5.3.2 Urban Design and Placemaking Vision for the Dundrum LAP area

Section 2.5.1 of the LAP sets out the main urban design principles for Dundrum as follows:

- *“Strengthening the urban fabric of the area by providing new developments which enhance the public realm and improve the streetscape.*
- *Reinforcing local identity and sense of place by respecting the heritage of the area while providing for new adaptable modern structures.*
- *Providing a coherent and permeable urban structure.*
- *Ensuring pedestrian and cycle permeability and connectivity.*
- *Addressing physical severance.*
- *Encouraging a fine urban grain in the major town centre and in other locations as appropriate. Providing for inclusive design, universal access and movement for all.*
- *Promoting an efficient use of land by way of compact growth.*
- *Improving sustainability by enhancing SuDS and the ecosystem services of the area”*

The proposed development adheres to these urban design principles:

- The imposing boundary wall is altered to provide additional entrances and linkages, with a section to the south at Rosemount Green removed, and sections along Dundrum Road reduced in height;
- the site layout respects the heritage buildings and by opening up the site, the older buildings and associated retained landscape will be incorporated into the wider urban fabric, reinforcing a sense of place and local identity;
- improved permeability and connectivity informed the site layout, significant enhancements to pedestrian and cycle permeability are provided along with connectivity to adjoining lands;
- physical severance is minimised by providing new linkages to the north, south and west;
- Inclusive design, universal access and movement for all informed the layout of the scheme;
- Appropriate residential density and compact growth are delivered;
- The scheme includes SuDS measures, including wetland areas.

Section 2.5.2 sets out four policies relating to urban design in the Dundrum area. These are as follows:

*“Policy DLAP1 – Urban Design:*

*It is Policy to promote a high standard of urban design in Dundrum in accordance with the relevant policies set out in the County Development Plan, Section 28 Guidelines and other relevant guidance documents including: The ‘Urban Design Manual’ (2009), and the Design Manual for Urban Roads and Streets (2019). Development shall be carried out in a design led manner that prioritises place making and accords with the Urban Design and Placemaking Vision for the Dundrum LAP area as set out in section 2.5.1.”*

*“Policy DLAP2 – Urban Design Dundrum:*

*It is Policy that development shall contribute positively to the distinct character of Dundrum by successfully marrying the new architecture with the historic structures in terms of blocks and plots that are legible, permeable and appropriate in land use, scale, building height, street width, urban grain and street frontage.*

*“Policy DLAP3 – Services:*

*It is Policy that attention shall be paid at an early stage to the location of all building services, particularly where they interface with the public realm (including ESB*

*substations). All building services shall be carefully designed to be visually acceptable and located to avoid an over concentration on any particular street or frontage. Proposals for significant development shall clearly demonstrate how provision of such services is to be addressed.”*

*“Policy DLAP4 – Roof Services:*

*It is Policy that services on roofs, including lift and stair over runs, ventilation and smoke shafts, photovoltaic cells and other plant and services will be so designed and sited so as not to be visually prominent. In this regard:*

- *Structures housing services shall be set back from the building edge.*
- *Natural ventilation of buildings will be promoted.*
- *Roof structures shall be appropriately screened.*
- *Materials of structures and screening shall be of a high quality and light in colour.*
- *All structures on roofs shall be limited in number and size and avoided where possible.*
- *Any roof structures shall not conflict with the requirements for green and blue roofs set out in the DLR County Development Plan.*
- *Proposals for significant development shall clearly demonstrate how provision of such services is to be addressed.”*

The proposed development and the associated Masterplan were informed by good urban design principles and the DLAP Policies. The enclosed Masterplan and Architectural Design Report address the design and urban design of the proposed development in detail.

- The proposed development adheres to the Urban Guidance noted in Policy DLAP1, as discussed in the section directly above. A DMURS Compatibility Statement prepared by ILTP is enclosed, and the Urban Design Manual informed the proposed development (see the enclosed Architectural Design Report and Section 4.4 of this Report).

- The proposed development will have a distinct character marrying new architecture with the historic buildings on site, the overall site layout was informed by the LAP and detailed Master planning it is considered consistent with DLAP2.

- Service buildings are appropriately designed and located in order to minimise impact on the public realm in accordance with DLAP3.

- Roof Services are minimised and are not visually prominent, with plant largely provided at ground level/lower ground level, or within buildings and consistent with DLAP4.

### **5.3.3 Street Improvements and Public Realm**

Section 2.7 sets out policies relating to public realm improvements. The following policies are relevant to this site:

*Policy DLAP5 – Public Realm:*

*It is Policy that all significant new development provides connected, attractive, interesting and well used public realm and open spaces using place making and urban design principles, creating a pedestrian centred environment with active, inviting public spaces and parks.*

*Policy DLAP6 – Public Realm Rebalancing:*

*It is Policy that that there is a rebalance of available space toward pedestrians, cyclists and urban greening.*

The proposed development adheres to the above referenced policies.

The proposed development improves the site's relationship to Dundrum Road and Rosemount Green by removing/reducing the height of the boundary wall and providing new connections. The development also provides a series of attractive spaces, which utilise where possible existing features of the site, including mature trees, the walled garden, and tree planting. The proposed active travel route follows a series of Public Open Spaces, elsewhere across the site, the needs of pedestrians are met through the provision of paths that serve desire lines, with appropriate junction designs. The scheme is consistent with DLAP5.

The scheme provides an active travel route through the site from the northwest corner to the south, which will improve connectivity in the local area for pedestrians and cyclists. The scheme provides extensive green spaces, including c. 30% of the site allocated as Public Open Space in the Part 10 Application site (or 28% in the Masterplan, subject to a further planning application). The proposal is therefore consistent with DLAP6.

#### **5.3.4 Former Central Mental Hospital (CMH) KDA**

The site is designated as a Key Development Area (KDA). Section 2.8.5.2 sets out the following vision for the site:

*“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.”*

The vision goes on to note that the permission has been granted on the site and that the *“Planning Authority were broadly satisfied with much of the design approach put forward in the Land Development Agency non statutory Masterplan....”*

*“Notwithstanding, background work on the Plan examined how this Masterplan layout could be optimised so as to provide for the best amenity for future residents while still being mindful of the impact on the existing surrounding community. 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.*

*The former Central Mental Hospital building and outbuildings are unlikely to be suitable for traditional residential accommodation of a modern standard due to their internal layout, cellular plans, inadequate window sizes and conservation constraints. For this reason, another use may be possible on this site, in particular the main*

*building, e.g. office, hotel, community or educational use. It may be possible to look at the addition of residential typologies to the rear of the main building subject to high quality design and a conservation appraisal of the site in the round.”*

The design of the proposed development has been informed by the previous planning application as well as the DLAP. Heights have been reduced at the periphery of the site to the northeast and southwest in particular, with higher buildings located in the centrally located blocks running north south, which are well set back from the main Protected Structure with mature trees retained in the intervening open space.

An updated Masterplan is enclosed with this Application, which details the future use of the former Central Mental Hospital building and associated structures as an enterprise centre and community use, detailed proposals for which will be brought forward via a separate future Planning Application in due course.

### 5.3.5 People and Homes

Chapter 3 sets out the Plan’s objectives around creating successful neighbourhoods and protecting residential amenity. The chapter places an emphasis on the ‘10-minute neighbourhood’ concept.

A number of other uses are provided within the proposed development, which will serve the new and existing population of the area creating a successful neighbourhood and contributing to residential amenities. These include *inter alia*, a childcare facility, community use building, medical centre, café, restaurant and retail use, in addition to public open spaces with play areas.

### 5.3.6 Play Facilities

The Plan identifies the CMH site as an opportunity for providing a playground. Objective P2 states that:

*“It is an Objective to provide inclusive and accessible play facilities within the DLAP area in accordance with figure 3.2, site framework strategies in Chapter 2 and at other suitable locations. A playground is proposed in Finsbury Park open space and the Council will investigate the feasibility of providing unstructured play opportunities through enhanced public realm projects.”*

Formal Play Areas are provided in the Public Open Spaces between Blocks 5 and 6 to the south of the site and between Block 10 and the main hospital building to the north of the site, as per Figure 3.2 of the DLAP, with informal play opportunities elsewhere in the site. Play Areas are also provided within the Communal Open Spaces for residents.



### 5.3.7 Childcare Facilities

Figure 3.3 of the DLAP identifies an opportunity for providing childcare on the CMH site. Policy DLAP12 – Childcare Facilities states that:

*“It is Policy to encourage and support the provision of childcare facilities within the DLAP area to ensure that existing and future residential developments have access to childcare services. In this regard:*

- *At least one childcare facility shall be provided at each of the childcare opportunity sites identified in Figure 3.3, and,*
- *All planning applications for larger residential developments to be required to provide one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, unless it can be satisfactorily demonstrated that there is already an adequate provision in the area.*

*The provision of childcare facilities within the Plan area shall be carried out in accordance with the provisions set out under Policy Objective PHP6 ‘Childcare Facilities’ and Section 12.4.10 ‘Childcare Facilities – Parking & Access’ of the County Development Plan 2022-2028 and/or any subsequent plan and the provisions of the DoEHLG ‘Childcare Facilities Guidelines for Planning Authorities’ (2001) or any updated guidelines.”*

A Childcare Facility is provided in Block 10, as per Figure 3.3 of the DLAP.

The Childcare Facility is sized to provide 20 childcare spaces per 75 dwelling units that are two-bed four-person units, or four bed units, 132 No. childcare places. For the purposes of calculating childcare spaces the one bed units, two bed three person units (which the Apartment Guidelines, 2024 note are aimed at particular housing needs), and the two assisted living units were discounted. As detailed previously in this Report this methodology is consistent with the *Apartment Guidelines 2023*. Furthermore survey information in the enclosed *Social Infrastructure Audit* prepared by Tom Phillips + Associates identifies capacity in the existing childcare facilities in the area.

### 5.3.8 Community facility

Objective P4 – Multi-functional community and leisure facility states that:

*“It is an Objective to provide for a multi-functional community and leisure/indoor sports facility on the former Central Mental Hospital (CMH) site. The location and design of any such facility shall ensure provision of good pedestrian and cycle accessibility and demonstrate links to the wider area.”*

A multifunctional community and leisure facility is provided in Block 6 to the south of the scheme, close to Rosemount Park. Further facilities include community rooms and a multifunctional hall. Block 6 is located in proximity to the active travel route which transects the site, providing direct linkages to adjoining lands and to the new pedestrian and cycle connection to Annville Park. Car and cycle parking facilities are provided for the community facilities.

### 5.3.9 Tenure

Section 3.3.3 notes the policies in the County Development Plan in encouraging a sustainable mix of housing including tenure mix, as well as SLO 123 on the CMH site in providing a balanced housing mix. Section 3.3.3 also acknowledges the Land Development Agency's role in developing the CMH site providing affordable housing.

The proposed development will provide a balanced mix of tenure, with 19% of the units assigned as Social Housing (179 no. social units, and 2 no. community homes), and the remaining 81% provided as Affordable Housing Units provided by The Land Development Agency (Right Size for sale units (52 no.), Affordable for Sale units (122 no.), and Cost Rental Housing(579 no.)).

### 5.3.10 Density and Plot Ratio

Section 3.3.4.1 relates to site density and notes that

*"Given the central presence of the Luas and major bus corridors within the LAP lands, there is scope on appropriate sites for residential densities of greater than 50 units per hectare. More dense European cities have demonstrated that appropriate densities provide for high quality design and place making which leads to successful and sustainable living environments. This can be achieved by using building heights of 4 to 8 storeys."*

Policy DLAP17 – Residential Density goes on to state:

*"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"*

Objective H1 – Plot Ratio on Strategic Regeneration sites sets out that:

*"It is an Objective that any proposals for significant redevelopment on the OSCS and the former CMH site generally accord with the Plot Ratio parameters set out in the individual site frameworks in Chapter 2."*

The subject site which is 9.6 ha in area (excluding the lands outside the former CMH landholding, and the area of the former CMH landholding which is excluded from the Application boundary). It is therefore large enough to create its own character with minimal impact on existing residential amenities and the established character of the area. The building heights range from 2 to 7 storeys, with one 8 storey building.

The proposed net density is 146 units per hectare. This higher net density can be supported at the site as the Application demonstrates that:

- adequate social and community infrastructure is provided within the scheme, between the sports and community facilities in Block 6, the local services provided in the Gate Lodge, Block 10 (childcare facility), medical centre (Block 2), retail and restaurant facilities (Blocks 3 and 7).
- the design response responds to the character of the site seeking to retain the features that create the character of the site, including setting back development from the Main Hospital Building, the adaptive reuse of the Gate Lodge as a cafe, retention of mature trees where possible and addition of new planting to support biodiversity, retaining large parts of the Boundary Wall with the removal or reduction in height of carefully selected sections, provision of large areas of Open Space, retention of the Walled Garden.
- the proposed development provides for a mix of uses that will support the existing and new population enhancing the local services and facilities, it also provides a range of housing typologies suitable for a range of needs.
- the development provides for high quality public open spaces and public amenities, the site will be open to the public for the first time in its history and will be integrated into the surrounding area.

The Plot Ratio for the proposed development is 1 : 0.98 and 1 : 94 for the whole Masterplan, which is consistent with the site framework detailed in Chapter 2 of the DLAP.

### 5.3.11 Building Heights

Section 3.3.4.2 makes reference to the *County Development Plan 2022-2028 Building Height Strategy for the County* and also notes that detailed height guidance is provided for under the relevant key development area frameworks.

Policy DLAP18 – Building Height states:

*“It is Policy that building height in DLAP generally accords with the height guidance set out in Chapter 2, subject to Policy Objectives BHS1 and BHS2 of the Dun Laoghaire Rathdown County Development Plan 2022-2028. (consistent with NPO 35 of the NPF, SPPR 3 of the ‘Urban Development and Building Height; Guidelines for Planning Authorities’ (2018) or Policy Objectives in any subsequent County Development Plan.*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings. In circumstances where compliance with Policy Objective BHS1 and BHS2 of the County Development Plan (see Appendix 5) can be demonstrated additional height may be appropriate, subject to complying with; the safeguards outlined in the CDP, the policies and objectives of this local area plan and the performance based criteria as set out in Table 5.1 of the BH Strategy (See Appendix 5) or as set out in any subsequent County Development Plan.”*

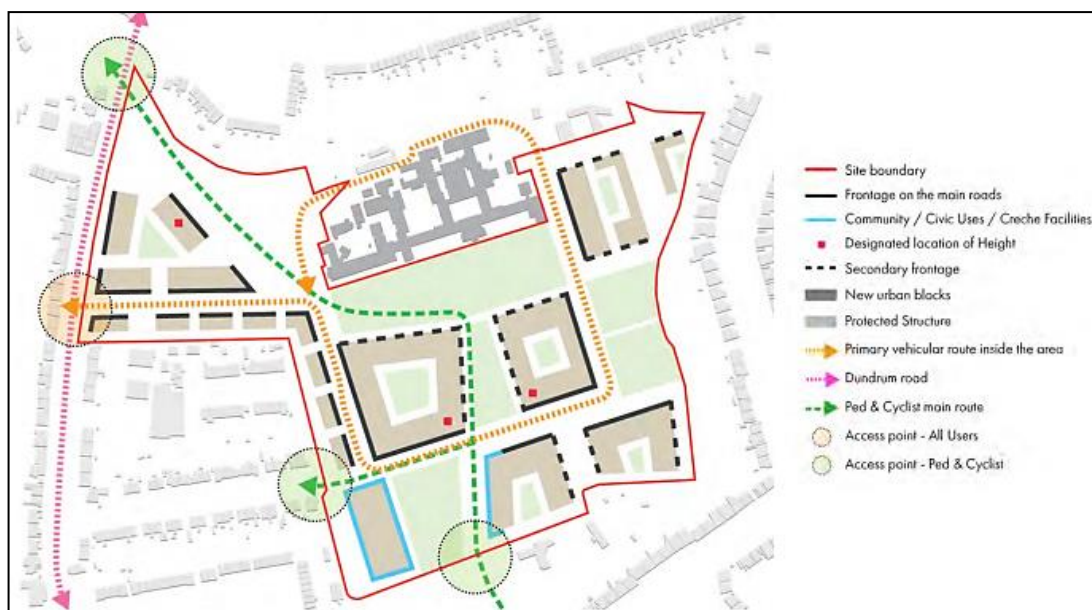


Figure 5.11: Extract from Figure 2.18 of the *Dundrum LAP 2023* showing the indicative urban form for the CMH site.

The proposed development ranges in height from 2 to 8 storeys and has been designed in accordance with the objectives set out in the LAP. Objective CMH10 of the LAP states that:

*“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.”*

Section 2.8.5.2 goes on to note general satisfaction with the LDA’s non-statutory masterplan and states:

*“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.]

The current proposal includes low-rise blocks, of 2 to 4 storeys, along the perimeter which will minimise any impact on the amenity of the neighbouring properties. The height of some of the perimeter blocks were reduced in height compared to previous iterations in order to align with the objectives of the LAP and to minimise any impact to existing residents in the neighbouring properties.

The central blocks running north south are 7 and 8 storeys which is consistent with the LAP guidance allowing heights over 7 storeys at the centrally located blocks. Block 3 where the height is increased to 8 storeys is the most central block and is also furthest away from any existing neighbouring properties which are all residential dwellings and by and large are low rise. The taller blocks are well set back from the Protected Structures, with a large open space and mature trees in the intervening space.



Thus, whilst the LAP graphic 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.”*

Thus, we consider that the proposed development is consistent with the heights set out in the LAP.

### 5.3.12 Residential Mix

Section 3.3.4.3 references the County Development Plan 2022-2028 strategy regarding residential mix and contains Policy DLAP19 which states:

*“It is Policy that all new residential developments within the DLAP area shall accord with the mix requirements set out in Policy Objective PHP27: Housing Mix and Section 12.3.3.1 of the County Development Plan (or any mix requirements in any subsequent County Development Plan). In this regard, all planning applications for residential development within the DLAP area shall provide for a suitable mix of house types and sizes that meet the needs of a range of households and should incorporate larger flexible housing units that can be adapted to suit changing household needs.*

*Residential developments shall be required to demonstrate how they both complement and enhance the existing residential mix, and contribute to a diversification of house type and size in the area.”*

As previously discussed, the Application is made by Dun Laoghaire Rathdown County Council in partnership with The Land Development Agency through the Part 10 process.

The proposed development will provide a variety of housing types and tenures, including 2 no. five-bedroomed Assisted Living units. The total housing mix is proposed as follows:

|           | No. of Units | % of Units |
|-----------|--------------|------------|
| 1 bedroom | 342          | 36.6%      |
| 2 bedroom | 450          | 48.2%      |
| 3 bedroom | 140          | 15%        |
| 5 bedroom | 2            | 0.2%       |
| Total     | 934          | 100%       |

Policy Objective PHP27: Housing Mix of the Dún-Laoghaire Rathdown Development Plan 2022-2028 states that:

*“It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.”*

Table 12.1 of the Plan requires a unit mix for schemes of 50+ units in an existing built-up area. However, the proposed development remains compliant with the Development Plan as Section 12.3.3.1 of the Development Plan confirms that the unit mix can be varied in Part 8 or Part 10 schemes:

*“Council Part 8 or **Part 10 residential schemes, may propose a different mix having regard to the specific needs of the Council Housing Department.**”* [Our emphasis.]

This is a Part 10 Application and as stated above, under Table 12.1 can follow a specific unit mix and tenure split, which is aligned with the requirements of the Dun Laoghaire Rathdown County Council’s Housing Department for Social and Affordable Housing.

As a result, the unit tenure has been adjusted in agreement with the Housing Department and the scheme will provide *“a variety and choice of housing units by type and size so as to meet the differing household need in the County”* as required by the Development Plan. The Unit typologies also include for Duplex units, ground floor “own door” Units in a variety of size, and two five-Bed Community Homes which will be used by residents from the St. John of God’s.

The proposed development provides 934 No. social and affordable houses, which will be developed by DLRCC and the LDA, as there is a demonstrable need for such housing.

### 5.3.13 Housing Options

Section 3.3.5 sets out the Plan’s aim to increase the variety of housing options available which includes housing for older people, student accommodation, housing for people with a disability and social and affordable housing units.

With regard to housing options, the following policies and objectives are relevant to this site:

*“Policy DLAP20 – Housing Options:*

*It is Policy to support and promote housing options for older people and persons with a disability within the DLAP area, including purpose built accommodation and housing options that meet specific needs in accordance with Policy Objective PHP30 in the County Development Plan 2022-2028. In this regard, new residential developments shall be required to incorporate an appropriate quantum of housing units that:*

- *Promote aging in place opportunities for older persons to ‘rightsize’ within their community.*
- *Take account of all abilities through the principles of universal homes design.*
- *Facilitate adaptable layouts to suit changing needs.*
- *Any proposed development for purpose-built accommodation for a specific need or group shall demonstrate how this objective can be secured long-term.*



*(See OSC15 in Chapter 2 for objective to provide older person accommodation on the old shopping centre site)."*

*"Policy DLAP21 – Social Housing:*

*It is policy:*

*To support the delivery and integration of social housing within the DLAP area and to pursue further opportunities for social housing in an integrated manner, through 'Part V' housing, Council own build, Affordable Housing schemes, delivery by the LDA within the Central Mental Hospital lands, delivery through Approved Housing Bodies, in accordance with Policy Objective PHP31 in the County Development Plan 2022-2028 and the Council's Housing Strategy and HNDA.*

*To support new and innovative ways to meet housing demands in the plan area while also ensuring that there is an appropriate mix of tenure and dwelling types provided to meet the needs of the current and future population of Dundrum."*

*"Objective H2 – Housing for All:*

*It is an Objective to ensure the provision of a range of housing options within the DLAP area, that take account of all ages and abilities as future residents progress through different stages of life, that all new residential developments of 10+ units shall include a minimum of 25% of the total housing stock that is designed to facilitate an ageing population / people with a disability. In this regard, the following provisions should be taken into account in the design and location of such units:*

- Units should be designed having regard to the universal design homes principles.*
- Insofar as possible, units should be located at ground floor level with own door access.*
- Units should contain a minimum of 2-bedrooms.*
- Ideally, units should be located where residents have a short walk to site entrances that adjoin public transport links and amenities within or adjacent to the proposed development.*
- To assist with ease of access to public transport links and amenities, landscaping within any new development shall be designed having regard to ease of movement and legibility for all users."*

*"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."*

The proposed development provides for a range of housing tenancies and unit types, including 2 No. 5 bed assisted living community homes in Block 2 as part of the social housing provision the end user of which has been agreed, and right size for sale units to allow households right size from larger homes to smaller units. The scheme also provides for Universal Design units (207 No. UD units and 27 No. UD+ units; 234 No. in total), these units are located across the

site in all Blocks allowing for a wide range of choice and catering to the different tenures. A number of the units, particularly in Blocks 2, 8 and 9 have own door access.

The proposed development provides for 181 No. social housing units, or 19% of the total provision. However, the majority of housing will be cost rental units operated by The Land Development Agency. The proposed tenure mix will cater to a range of needs, and is consistent with the DLAP and the Development Plan objectives in relation to housing.

The overall scheme includes a range of communal facilities in Block 6, which will be available to the residents of the scheme and the public. Facilities include a series of community rooms, a multipurpose hall, changing facilities associated with the sports facilities, ancillary facilities such as stores, kitchens and offices are also provided. The design of Block 6 was informed by detailed consultation with the DLRCC Parks Department. Other supporting facilities such as a childcare facility, medical centre, retail units are also provided on site.

### 5.3.14 Transport and Movement

Chapter 4 sets out that an Area Based Transport Assessments (ABTA) in line with *Policy Objective T2: Local Transport Plans* of the County Development Plan 2022- 2028 was prepared to inform the transport strategy of DLAP. The outcomes of this ABTA underpin the policies regarding transport and movement in the DLAP. These policies include:

*“Policy DLAP24 – Connected Network:*

*It is Policy to provide attractive high-quality inclusive and connected walking and cycling networks with direct routes to local destinations and public transport hubs.”*

*“Policy DLAP25 – 10-Minute Concept:*

*It is Policy to promote the ‘10-minute’ settlement concept in Dundrum with reduced walking times to essential daily services.”*

*“Policy DLAP26 – Modal Shift:*

*It is Policy to provide an environment which supports moving people from the private car to more sustainable modes. This can be done by way of further developing the network where a range of facilities and services are accessible in a short walking and cycling timeframe from homes, or are accessible by high quality public transport located within a short walk from home.”*

*“Policy DLAP27 – Improved Environment:*

*It is Policy to seek to improve the air quality and pedestrian environment along the streets through Dundrum village including, Main St, Sandymount Road, Kilmacud Rd Upper and Ballinteer Road as well as at school zones and along the main pedestrian access routes immediately adjacent to the school.”*

*“Policy DLAP28 – Employment Access:*

*It is Policy to support improved economic competitiveness of Dundrum Major Town Centre by improving access for all.”*

*“Policy DLAP29 – Vehicle Reduction:*



*It is Policy to reduce the need for vehicular travel within Dundrum by enhancing the integration of land-use and transport.”*

*“Policy DLAP30 – Safe Schools: It is Policy to provide safe access to schools via walking/cycling, safe front of school environment and to support the Safe Routes to School initiative.”*

The proposed development provides for significant improvements to pedestrian and cyclist connectivity from the site to surrounding lands, and between adjoining lands through the site. These connections will support modal shift to sustainable modes of traffic, and will provide part of the improved connections to Dundrum Town Centre and to local schools.

The proposal also provides for certain local services for new and existing local residents, thus reducing the need to travel for daily essentials, and reducing reliance on vehicular travel.

The alterations to the Boundary Wall along Dundrum Road, will improve the pedestrian environment along that portion of Dundrum Road, by improving passive surveillance and a more human scale.

The ABTA included a number of objectives with the most relevant being *Recommendation DAR23: Dodder to Dundrum Pedestrian and Cycle Route* which cuts through the site. The objectives relevant to this include:

*“Objective T21 – Dodder to Dundrum Pedestrian and Cycle Route:*

*It is an Objective of the Local Area Plan, to create a new pedestrian and cycle route connecting the Dodder Greenway to Dundrum Major Town Centre via the site of the former Dundrum Central Mental Hospital.”*

*“Objective T22 – Localised Boundary Set-back:*

*It is an Objective of the Plan to seek the set-back of roadside boundaries at the pinch points illustrated in figure 4.13 to facilitate the delivery of improved pedestrian and cycle infrastructure.”*

*“Objective T23 – Former Central Mental Hospital site:*

*It is an Objective to require the development of a high quality pedestrian and cycle facility through the site of the former Central Mental Hospital, to form part of the proposed Dodder to Dundrum cycle route.”*

The proposed development incorporates an active travel route through the site from the northwestern corner to the southern boundary with Rosemount Green, which will serve both pedestrians and cyclists. This will form part of the Dodder to Dundrum cycle route referred to in Objectives T21 and T23.

The boundary at the northwestern corner of the site is proposed to be removed, which will remove a pinch point by the existing pedestrian crossing at Dundrum Road and is thus consistent with Objective T22 and Figure 4.13. Two further breaks in this part of the Boundary Wall are proposed, which facilitate a connection to the existing cycle and pedestrian route from Dundrum Road towards Mulvey Park, and the removal of the existing entrance gate and adjoining parts of the Boundary Wall.

### 5.3.15 Climate Action – Mitigation and Adaption

Chapter 5 sets out how climate change adaption and mitigation measures apply to the LAP area. The Chapter notes the County Development Plan sets out the overarching policies in relation to climate action measure with Section 5.2.1 of the DLAP specifically noting the variety of woodlands and trees designation for preservation and protection on the Central Mental Hospital Lands. Other plans that have informed this chapter of the DLAP include the *dlr Climate Action Plan 2019-2024 (CCAP)* and the *DLR Biodiversity Action Plan 2021-2025*.

The proposed development has been informed by an Environmental Impact Assessment Report, the scheme retains a significant number of the mature trees on site, particularly by the existing entrance of the site, in front of the main hospital building and the tree planting is reinforced across the site. Furthermore, biodiversity considerations have heavily informed the landscaping proposals, which were developed in consultation with Altamar, the project Ecologist, in consultation with the DLRCC Parks Department and DLRCC Biodiversity Officer.

### 5.3.16 Climate Adaption and Mitigation – Green Infrastructure

Section 5.3.1 highlights the aim to increase biodiversity in the LAP area and references the Central Mental Hospital as a notable example of ‘*woodlands, treelines and hedgerows.*’

Policy DLAP31 – Protected areas and habitats and species states that:

*“It is Policy to:*

- *Conserve Protected Areas and other high-quality habitats and species thereby ensuring a rich and diverse environment within the Plan area.*
- *Ensure biodiversity is factored into nature based solutions when developing proposals within the DLAP area.*
- *Conserve and restore biodiversity in line with the key theme of the dlr County Biodiversity Action Plan 2021 – 2025.”*

The proposed landscaping has sought to retain as many good quality trees on site, biodiversity considerations have informed the landscaping scheme, with additional wetland areas provided in order to support biodiversity, adaptation of lighting plans to protect wildlife (lighting colour, location of lights) and selection of planting species. The proposed landscape plan was developed by AECOM Landscape Architects in consultation with Altamar the project Ecologist, and in consultation with the DLRCC Parks Department and DLRCC Biodiversity Officer.

### 5.3.17 Green Infrastructure – Nature Based Solution – Surface Water Management

Section 5.3.2 contains the following policies regarding surface water management:

*“Policy DLAP32 – Sustainable Water Management:*

*It is Policy to implement the main elements of the DLR GI strategy in relation to water management including:*

- *Reducing the rate, volume, and improve the quality of surface water runoff.*
- *Managing runoff at -source through the use of infiltration systems.*

- *Promoting local sustainable urban drainage systems (SuDS), ‘Green Streets’ and green roofs. Enabling SuDS to be located in the public realm.*
- *Utilizing the river Slang where possible as a natural foundations for a GI corridors.”*

*“Policy DLAP33 – SuDS:*

*It is Policy to ensure that Sustainable Drainage Systems (SuDS) is applied to any development in the DLAP area and that site specific solutions to surface water drainage systems are developed which meet the requirements of the Water Framework Directive and associated River Basin Management Plan. SuDS measures may include green roofs, permeable paving, detention basins, infiltration systems etc.”*

*“Policy DLAP34 – Surface Waters Regulations:*

*It is Policy to ensure the implementation of the surface water legislation Environmental Objectives (Surface Waters) Regulations 2009 to ensure that development permitted would not have an unacceptable impact on water quality including surface waters, ground water, river corridors, estuarine waters, bathing waters, coastal and transitional waters.*

*Development within the LAP area shall comply with the Policies and Objectives of the County Development Plan relating to protection of existing water and drainage infrastructure.”*

BMCE have designed the surface water management proposals which reflect DLR policies in this regard, a range of SuDS Measures are proposed as per the enclosed BMCE SuDS Layout Drawing (Dwg No. DCD-BMD-00-00-DR-C-11030, and DCD-BMD-00-00-DR-C-11031) and *Infrastructure Report*. This Report demonstrates compliance with DLAP32.

In respect of DLAP33 we refer again the BMCE as well as the enclosed *Water Framework Directive Screening Assessment*, prepared by AWN, which concludes *“that it has been assessed that it is unlikely that the proposed development will cause any significant deterioration or change on its water body status or prevent attainment, or potential to achieve the WFD objectives or to meet the requirements and/or objectives in the second RBMP 2018-2021 (River Basin Management Plan) and draft third RBMP 2022-2027.”*

In respect of DLAP34, the development is consistent with the above as in addition to the detail provided in the enclose BMCE *Infrastructure Report*, the Application has been the subject of full Environmental Impact Assessment (see in particular Chapter 9 Land, Soils, Geology and Hydrogeology and Chapter 10 Hydrology) and Appropriate Assessment Screening and a Natura Impact Statement.

### 5.3.18 Green Infrastructure- Parks and Recreation

Section 5.5.3 contains the following objective relating to the site:

*“Objective GI10 – Provision of new open spaces:*

*It is an Objective to seek the provision of new high quality landscaped public open spaces in any redevelopment on the two key strategic regeneration sites of Central*

*Mental Hospital and Dundrum Old Shopping Centre. Public open space shall accord with the site frameworks set out in Chapter 2 and the design of new open spaces will be required to have regard to all users, regardless of age or ability (refer to Policies and Objectives in Chapter 3)."*

The proposal complies with Objective GI10 by providing high quality landscaped public open spaces across the former CMH landholding.

The Public Open Spaces are designed to provide access to all users, regardless of age or ability and accord with the site framework for the lands.

### 5.3.19 Climate Adaptation – Flood Risk Management

Section 5.4 contains *Policy DLAP35 – Flood Risk Management*:

*"It is Policy to manage flood risk in the DLAP area in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014). and to require all proposed developments to carry out a Site-Specific Flood Risk Assessment that shall demonstrate compliance with:*

- *The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG/OPW, 2009), as may be revised and/or updated.*
- *The prevailing Dún Laoghaire-Rathdown County Development Plan.*
- *Any SSFRA shall not be required to carry out a Plan-Making Justification Test, given that this exercise was already carried out at County Development Plan-level.*
- *The SSFRA shall pay particular emphasis to site specific mitigation measures and any necessary management measures, as per Appendix B4 of the above 2009 National Guidelines."*

In this regard, we confirm Barrett Mahony Consulting Engineers have prepared the enclosed *Site Specific Flood Risk Assessment (FRA)*, in accordance with the requirements of the Guidelines. This Assessment concludes the developed site is shown not to be at a significant risk from flooding and to not create a significant risk to adjoining areas or downstream. Therefore, the development is deemed acceptable from a flood risk assessment perspective. Refer to the enclosed Assessment for further information.

### 5.3.20 Climate Mitigation – Renewable Energy

Section 5.4 contains the following policies relating to energy use.

*"Policy DLAP36 – Sustainable Energy Use:*

*It is Policy to:*

- *Support the initiatives where relevant of any Sustainable Energy Communities within Dundrum.*
- *Support initiatives where relevant which improve sustainable energy use within the Plan lands."*

*"Policy DLAP37 – Renewable Energy Use:*



*It is Policy to:*

- *Encourage and support the development of solar energy infrastructure, including photo voltaic (PV) in appropriate locations.*
- *Support the development of district heat networks and the utilisation of waste heat recovery.”*

EDC have prepared the enclosed *Energy & Sustainability Report*, which details the proposed energy infrastructure for the proposed development including use of PV at selected locations to provide for renewable energy use. That Report states:

*“The Centralised heating system is intended to provide 100% of the space and water heating using Air Source Heat Pumps. The Air-water heat pumps will be in a located in an ASHP compound in each apartment block. The renewable energy requirements set out in TGD Part L 2022, are expected to be met in all unit types with this type of system. Centralised heating systems are very similar to the District Heating (DH) systems. The main difference is the energy centres will be in a centralised location in each apartment block. Dwellings will also have HIU’s located in a services cupboard.”*

and

*“In line with DLRCOCO policy objective CA15: District Heating, and regional policy objective RPO 7.38 set out in the Regional Spatial & Economic Strategy (RSES) 2019-2031, a feasibility study for district heating systems was carried out for the proposed development. This feasibility study includes a heating strategy comparison for individual and communal district heating networks. Third party district heating and waste heat networks outside the development’s curtilage have been excluded from this study, as it was found there is no current heat networks in the area and the development in not located in a SEAI district heating candidate area.”*

The proposed development will rely on a centralised community heating network system which can future proof the development if district heating becomes available in the area in future. The scheme is therefore in compliance with these policies.

### **5.3.21 Sustainable Infrastructure**

Section 5.8 contains a number of policies relating to infrastructure including water supply, foul drainage and electricity.

*“Policy DLAP38 – Supporting Uisce Éireann:*

*It is Policy to support Uisce Éireann in the provision of adequate water and waste water treatment infrastructure to serve the needs of the existing and future population of the Plan area and ensuring that such infrastructure is provided prior to, or in tandem with, new development.”*

*“Policy DLAP39 – Wastewater Treatment:*

*It is Policy to facilitate Uisce Éireann in ensuring that all wastewater generated is collected, treated and discharged after treatment in a safe and sustainable manner, having regard to the standards and requirements set out in EU and national legislation and guidance.”*

*“Policy DLAP40 – Water Framework Directive:*

*It is Policy to facilitate compliance with the requirements of the EU Water Framework Directive and any relevant legislation. In this regard, the Council will facilitate compliance with the relevant objectives and measures set out in the forthcoming ‘River Basin Management Plan’ (2022- 2028) and associated Programme of Measures, where relevant. Applications for development under the Plan must demonstrate that the proposal for development would not adversely affect a water body’s ability to meet its objectives under the Water Framework Directive, individually as a result of the proposed development or cumulatively, in combination with other developments.”*

*“Policy DLAP41 – Groundwater:*

*It is Policy to ensure the protection of groundwater resources within the DLAP area and associated habitats and species in accordance with the EU Groundwater Directive. All new planning applications within the DLAP boundary shall have regard to the likely impacts the proposed development may have on groundwater resources.”*

The proposed development has been subject to *Environmental Impact Assessment Report*, which is enclosed with this Application. Water, Wastewater and Surface Water have been considered both in the enclosed EIAR and the *Infrastructure Report* prepared by BMCE. The *Infrastructure Report* includes, as an appendix, Confirmation of Feasibility and a letter of Design Acceptance from Uisce Éireann. Thus, in so far as these policies apply to the proposed development the scheme is consistent with Policies DLAP38 and DLAP39. In respect of Policy DLAP40 a *Water Framework Directive Assessment* prepared by AWN is enclosed, which demonstrates consistency with this Policy.

Chapter 10 Hydrology of the EIAR considers impacts on Groundwater resources, details appropriate mitigation measures and concludes *“there will be no cumulative impact to groundwater quality and therefore there will be no cumulative impact on the Surface Waterbody Status.”* Thus, the proposed development is consistent with DLAP41.

### 5.3.22 Dundrum Multifunctional Town and Neighbourhood Centres

Chapter 6 sets out the DLAP’s strategy relating to town centres and the provision of retail. Table 6.1 of the Plan provides a Retail Hierarchy as set out in the County Development Plan 2022 - 2028.

| Dún Laoghaire-Rathdown Retail Hierarchy |  |
|---|--|
| Major Town Centre                       | Dún Laoghaire & Dundrum  |
| District Centre                         | Blackrock, Stillorgan, Nutgrove, Cornelscourt & Cherrywood                     |
| Established Neighbourhood Centres       | Various e.g. Ballybrack, Ballinteer, Sandyford                                 |
| New Neighbourhood Centres               | Various e.g. Stepside, Ticknock, Carrickmines                                  |
| Key Development Areas                   | Various e.g. Woodbrook/Shanganagh, Kiltiernan/Glenamuck, Cherrywood, Old Conna |

**Figure 5.12. County Development Plan Retail Hierarchy 2022 – 2028.**

The proposed development provides for 3 retail units, which total 1,160 sq m in area (513 sq m, 280 sq m, 275 sq m, which are located in a central position in Blocks 3 and 7. These locally scaled units will support the needs of the immediate neighbourhood and increased



population, and are consistent with the overarching objectives relating to retail as set out in the DLAP.

### 5.3.23 Heritage and Conservation

Chapter 8 outlines the policies and objectives relating to the conservation of heritage within the LAP area. The Chapter includes general policies relating to heritage as well as site-specific objectives relating to individual character areas.

General policies relevant to conservation in the LAP area that are relevant to the site are:

*“Policy DLAP48 – Historic Character:*

*It is Policy to ensure the protection of the historical character of Dundrum and ensure that any future development / redevelopment is carried out in a manner sympathetic to its special character thus ensuring that the distinct character and intrinsic heritage qualities of the Dundrum area are recognised.”*

*“Policy DLAP49 – Built Heritage: It is Policy to conserve, protect and enhance (as appropriate) the built heritage of Dundrum, including the Architectural Conservation Areas, Protected Structures and attendant grounds, in accordance with best conservation practice and Policy Objectives set out in the County Development Plan, 2022-2028.”*

*“Policy DLAP50 – Character: It is Policy to seek to achieve an interesting and vibrant mix of the old and the new, to enhance the sense of place, character and identity of the Dundrum area.”*

*“Policy DLAP51 – High Quality Architecture: It is Policy to support the development of appropriate, architecturally significant development in Dundrum that has regard to Dundrum’s historical past character but contributes new and exciting elements.”*

*“Policy DLAP52 – Alterations to Protected Structures:*

*It is Policy to promote proposals that improve, alter, extend or change the use of Protected Structures that result in a viable modern use, subject to appropriate design, materials and construction methods. All such proposals must ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise and will be subject to assessment by the Council’s Conservation Officer(s).”*

*“Policy DLAP53 – Reuse of Protected Structures: It is Policy to consider positively the change of use of protected structures where it can be shown that the structure, character, appearance and setting will not be adversely affected and where its reuse for an alternative purpose is necessary to maintain the viability of the structure and to enable its upkeep.”*

The design of the proposed development and the wider Masterplan has been informed by the site’s heritage and character.

The scheme has been designed with regard to the historic character of Dundrum and the former hospital in particular, as per Policies DLAP48 and 49, whilst providing a development

consistent with the LAP design principles and the indicative urban form guidance provided for the CMH site.

The proposed development provides a mix of old and new and will enhance the character and identity of the Dundrum area in accordance with Policy DLAP50, by providing by developing the former CMH site for residential and supporting uses and public access including the provision of new public open spaces.

The design of the scheme incorporates high quality architecture within the former CMH site, as per Policy DLAP51.

The enclosed Masterplan sets out the principles which will guide the adaptive reuse of the Protected Structures, which will be subject to assessment by way of a future separate Planning Application. The consistency with Policies DLAP52 and DLAP53 will be assessed when the proposed works to the Protected Structures is proposed in a future Planning Application.

### 5.3.24 Character Areas

Section 8.4.8 identifies the CMH as a ‘*significant landbank with development potential*’ and categorises the site into two separate Character Areas – Main Hospital Complex and Demesne Lands as outlined in Figure 8.4 within the LAP.



Figure 5.13: Map showing CMH Character Areas

This application relates to Character Area 2 – Demesne Lands. Section 8.4.8.2 notes the open space character as a “*key architectural feature and function of the original 19<sup>th</sup> century hospital*”. The perimeter wall is also regarded as an “*important part of the character of the CMH lands*”. It goes on to state that “*The partial retention of this wall as part of the future re-development of the lands is considered appropriate, however the essential removal of parts of the wall to facilitate linkage and integration with adjacent lands is acknowledged*”.

Section 8.4.8.2 goes on to state that *“the re-purposing of the Gate Lodge and retention of any original fabric is required in the re-development of the CMH lands.”* It is also noted that the retention and re-use of the former agricultural buildings to the northeast of the main hospital *“would be considered suitable as part of the future re-development of the CMH lands.”* The LAP also sets out that *‘It is important that, as well as preserving all identified features of special interest, the re-development of the CMH lands preserves the landscaped setting and ‘Country House Demesne’ model as well as possible by providing buildings and open spaces of appropriate design.’*

Section 8.4.8 also contains five specific objectives relating to conservation on this site as follows:

*“Objective HC6 – New Development:*

*It is an Objective to ensure that all new development within the Main Hospital Complex character area seeks to preserve the special conservation interest of the Protected Structures and secure their re-use as part of the wider re-development of the CMH lands. The architectural merits of subsequent extension elements to these buildings should also be sufficiently considered, and the re-use of these extension elements will be sought where such extensions are of sufficient heritage value.”*

*“Objective HC7 – Reuse of Protected Structure:*

*It is an Objective of the Council to seek the sensitive reuse and adaptation of the main hospital building and associated historical elements to provide for residential, cultural, office, employment, civic, retail, enterprise, or community uses. Any use should not detract from any adjoining residential uses. (see also CMH10 in Chapter 2).”*

*“Objective HC8 – Boundary Treatment:*

*It is an Objective of the Council to seek the retention of substantial elements of the perimeter wall as part of the re-development of the CMH lands, except where their removal in part is required to facilitate permeability and connectivity, as per the Objectives set out in Chapters 2 and 3 of this Plan.”*

*“Objective HC9 – Adaptive reuse of features:*

*It is an Objective of the Council to seek the retention and adaptive re-use of the gate lodge, the walled garden and substantial elements of the perimeter wall as part of the re-development of the CMH lands. Any re-use should respect the contributions that these features of conservation interest make to the setting of the CMH lands.”*

*“Objective HC10 – Open Character:*

*It is an Objective of the Council to ensure that the ‘open’ character and landscaped setting of the CMH lands informs the re-development of the lands. Any design should seek to celebrate and enhance the setting of the unique built and natural features that contribute to the character of these lands.”*

The Masterplan guides the overall development of the entire former CMH site and seeks to preserve the special character of the Protected Structures. Whilst the reuse of the main hospital building and adjoining historic structures will be subject to a future planning application for this part of the site at which point they will be assessed under Objectives HC6



and HC7, these considerations informed the design of the new development which is the subject of this application.

The Gate Lodge, Walled Garden and substantial parts of the Boundary Wall are retained and in the case of the Gate Lodge to be reused as a café, this is consistent with Objectives HC8 and HC9.

In accordance with Objective HC10, the layout of the proposed development preserves the open character and landscaped setting of the site in accordance with the DLAP guidance, including the retention of a public open space of more than 8,000 sq m in front of the main hospital building.



## 6.0 DUNDRUM LOCAL AREA PLAN 'CONSISTENCY STATEMENT'

### 6.1 CMH KDA Design Principles

Objective CMH1 states:

*"It is an Objective that a Masterplan for the entire site shall be prepared and accompany all planning applications for significant development at these lands. The Masterplan shall accord with the Guiding Principles and Objectives set out in this Site Development Framework and shall be accompanied by a 'Consistency Statement' detailing how each of the Guiding Principles and Objectives in this SDF are to be delivered. Prior to application for permission the developer of the site should give consideration to engaging with the public on any masterplan."*

This section of this Report provides the required 'Consistency Statement', which details how each of the Guiding Principles and Objectives set out in the Site Development Framework for the former CMH lands will be delivered.

The enclosed Masterplan applies to the entire former CMH landholding and adheres to the Site Development Framework for the lands. It is based on the previous 2022 Masterplan for the lands, which was based on extensive public consultation, and consultation between DLRCC and the LDA.

Meetings and site visits were held with representatives from the Planning, Conservation, Biodiversity Departments of DLRCC to discuss the potential adaptive reuse of the main hospital building, and the adjoining structures and lands. Due to the challenges introducing an adaptive reuse to a Protected Structure of this scale, and the need to identify future occupant/s, these proposals will be brought forward under a separate Planning Application in due course.

The proposal is consistent with Objective CMH1.

The Guiding Principles are set out as follows:

- *"To develop a predominantly residential neighbourhood with a mix of unit size and tenure and with a strong sense of place which builds on the natural and heritage assets of the site.*
- *To require the suitable protection and reuse of the protected structures at an early phase in the redevelopment of the site.*
- *To provide new community facilities on site.*
- *To provide new childcare facilities on site.*
- *To allow more visual connections into the land parcel.*
- *To reduce the severance, by increasing the pedestrian and cycle access and egress points and to improve walking and cycling connectivity through the area by way of new pedestrian and cycle routes.*
- *To provide a high quality public realm that prioritises use by pedestrians and cyclists and which enhances the sense of place.*
- *To achieve an appropriate plot ratio for the accessible location while also balancing with the institutional objective to retain the open and sylvan character of the lands.*

- *To provide a network of open space which integrates with the amenities and biodiversity on site and suitably incorporates SuDS measures.”*

The Masterplan adheres to the Guiding Principles of the Site Development Framework for the former CMH lands:

- The overall development will be a predominantly residential neighbourhood, with a mix of unit sizes and tenures that builds on the natural and heritage assets of the site.
- The Protected Structures are currently in the ownership and management of the OPW, who have secured the buildings, which are not currently in use. The internal layout of the main hospital represents a potential constraint on the reuse of the site. DLRCC and the LDA have engaged to identify a new use for the main hospital building and surrounding historic structures. This work is ongoing and a separate Planning Application will be brought forward in the future.

Furthermore,

- The proposed development includes both community facilities and a childcare facility.
- The proposal provides a new opening in the boundary wall increasing visual connections particularly to the Dundrum Road to the west and Rosemount Green to the south.
- The pedestrian and cyclist access connectivity is improved through the provision of an active travel route through the site, as well as other connections to the public road network for cyclists and pedestrians, thus significantly reducing pedestrian and cycle access severance.
- the public realm is high quality and prioritises use by pedestrians and cyclists.
- the proposed development provides for an appropriate plot ratio and retains the open and sylvan character of the site.
- the open space network is designed to integrate with the amenities on site and beyond, the revised landscaping plans incorporate SuDS measures and seek to support biodiversity through the selection of planting, and the introduction of wetlands areas.

### 6.1.1 CMH KDA Movement Objectives

The DLAP sets out two objectives relating to transport and movement:

*“CMH2 – Vehicular Access*

*Any redevelopment shall:*

- *Provide a new signal controlled vehicular entrance onto the Dundrum Road to the south of the existing entrance.*
- *Convert the existing entrance into a pedestrian and cycle only entrance with provision for emergency access.”*

The proposed development is consistent with Objective CMH2

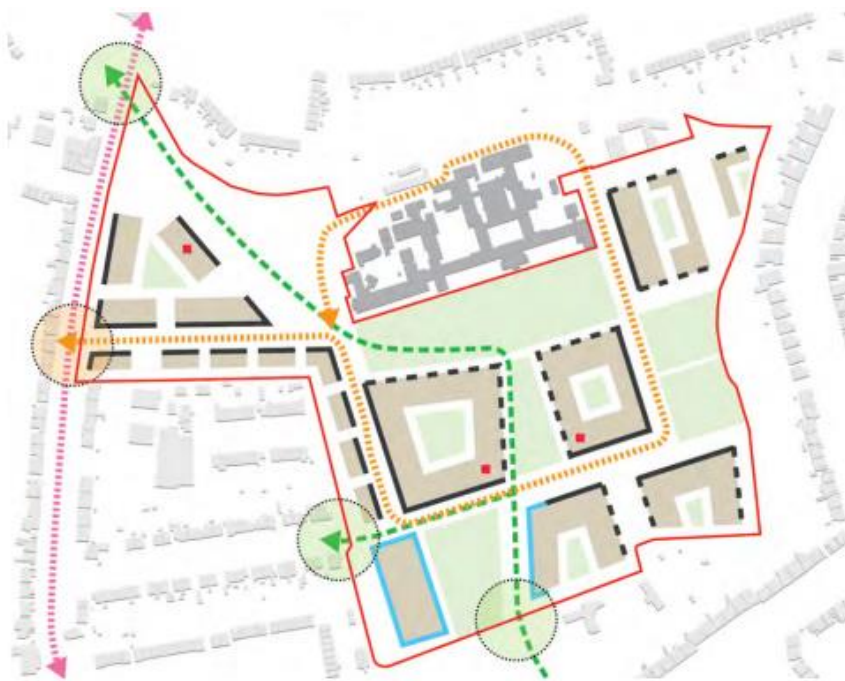
It provides a new signalised junction at Dundrum Road to the south of the existing vehicular access. The existing entrance will be used by cyclists and pedestrians, other than for emergency vehicle access.

*“CMH3 – Cycles/pedestrian*

*Any redevelopment shall:*

- *Provide a continuous pedestrian and cycle link of 5 metres in width from Mulvey Park to Larchfield Road through the site and on from the southern boundary through Rosemont Green. Emergency access for vehicles (emergency or other) shall be facilitated on this link.*
- *Provide additional pedestrian and cycle access points at Annville Park and at location(s) to the east (where an opportunity arises).”*

Fig 2.18 of the DLAP details the indicative urban form for the CMH site including access routes through the site.



**Figure 6.1: Indicative urban form for the CMH site as defined in the DLAP**

An active travel route for pedestrians and cyclists is provided from Mulvany Park to the boundary with Rosemont Green, where it could be extended to Larchfield Road. The route is 5m in width, with 4m hardcore (above current ground levels where existing trees need to be protected) and a 1m wide mown strip, which ensures this new route does not have the visual impact of a standard vehicular road. Emergency vehicles will be able to access the road network via the existing site entrance and use the internal roads which are largely parallel to the active travel route. Where the active travel route extends to the southern boundary between Blocks 5 and 6, this section of the active travel route is also designed as an emergency fire tender route. 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 Rosemont Green.

A cycle/pedestrian connection is also provided via a new opening in the boundary wall to Annaville Park, this is to the north of Block 6 which accommodates the community facilities. There are currently no other opportunities to provide additional cycle connections as the site otherwise adjoins private gardens. The scheme is consistent with Objective CMH3.

### 6.1.2 CMH KDA Placemaking Objectives

The Plan details two objectives relating to placemaking:

*“CMH4 – Public Spaces*

*Any redevelopment shall:*

- *Provide a public open space of c. 8,000 sq. metres to the south of the Asylum building in the first phase of development.*
- *Provide a public open space with a pedestrian and cycle connection to the Larchfield Road interface between Rosemount Green and the site.”*

The proposal complies with these Objectives as the development provides for public open spaces in front of the main hospital building which is 8,105 sq m in area.

A public open space is provided at the southern side of the site adjacent to Rosemount Green. This new public open space accommodates the southern portion of the active travel route within the site as far as the site boundary. The boundary wall between the site and Rosemount Green is to be removed at this location to improve the interface between the public open spaces. The active travel route will be brought to the southern site boundary where it adjoins 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.

*“CMH5 – Character*

*Require the provision of privacy buffers for ground floor residential units.”*

Privacy buffers are provided for all Ground floor residential units in compliance with CMH5.

### 6.1.3 CMH KDA Built Form Objectives

The following objectives relating to built form are included in the Plan:

*“CMH6 Built Form*

*Any redevelopment shall generally be in accordance with the indicative block layout shown on figure 2.18 ‘Indicative Urban Form for CMH site’”*

The proposed development follows the indicative urban form as defined in Figure 2.18 of the LAP as per Objective CMH6.

*“CMH7 – Heritage and Building Character*

*Any masterplan shall address plans for the sustainable long-term use of the 3 No. Protected Structures (Catholic Chapel (RPS No. 2071), Hospital/Asylum (RPS No. 2072),*

*Hospital Building (RPS No. 2073), and shall provide a phasing agreement demonstrating how proposals for their long term use will be brought forward and planning permission sought.”*

The Masterplan considers the sustainable long-term use of the Chapel, Asylum/Hospital and Hospital building, DLRCC and the LDA are actively working to identify a sustainable long term use for the buildings and occupants. Permission will be sought for that development by way of a separate Planning Application once the subject Application has been determined. An outline phasing plan is included at Section 11.3 of the enclosed Masterplan.

*“CMH8 – Heritage and Building Character  
Any redevelopment shall ensure any removal or modification to the site boundary wall to facilitate pedestrian / cycle / vehicular connections and reduce physical and visual severance is carried out in accordance with best conservation practice.”*

Alastair Coey Architects, Conservation Architects, have provided proposed mitigation measures in respect of the boundary wall to ensure the interventions are carried out in accordance with best conservation practice.

*“CMH9 – Plot Ratio, Height  
An overall general plot ratio of 1:1.19 shall be achieved.”*

The Plot Ratio for the current application is 1:0.98, and the overall Plot Ratio for the former CMH lands in the Masterplan is 1:0.94. This is slightly below the ‘general plot ratio’ identified in the LAP, this is consistent with Objective CMH9 having regard to the detailed design carried out in preparing the Masterplan, which would not have been available in preparing the LAP.

*“CMH10 – Plot Ratio, Height  
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.”*

Proposed heights range from 2 storeys near the northeastern boundary and at the southwestern edge of the site where the new buildings are closest to existing two storey dwellings. Heights rise towards the centre of the site to seven storeys with one part of the central Block 3 rising to 8 storeys in height. This is consistent with the DLAP heights strategy, as detailed elsewhere in this report and repeated below for completeness:

The proposed development ranges in height from 2 to 8 storeys and has been designed in accordance with the objectives set out in the LAP. Objective CMH10 of the LAP states that:

*“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.”*

Section 2.8.5.2 goes on to note general satisfaction with the LDA’s non-statutory masterplan and states:

*“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.]*

The current proposal includes low-rise blocks, of 2 to 4 storeys, along the perimeter which will minimise any impact on the amenity of the neighbouring properties. The height of some of the perimeter blocks were reduced in height compared to previous iterations in order to align with the objectives of the LAP and to minimise any impact to existing residents in the neighbouring properties.

The central blocks running north south are 7 and 8 storeys in line with the objectives of the LAP to increase the height of these centrally located blocks. Block 3 where the height is increased to 8 storeys is the most central blocks and are also furthest away from any existing neighbouring properties which are all residential dwellings and by enlarge are low rise. The taller blocks are well set back from the Protected Structures, with a large open space and mature tree in the intervening space.

Thus, whilst the LAP graphic 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.”*

Thus, we consider that the proposed development is consistent with the heights set out in the LAP and Objective CMH10.

*“CMH11 - Land Use*

*Any redevelopment shall:*

- *Provide for residentially focused mixed uses which includes residential development and a range of other complementary uses as per the ‘A’ zoning Objective and SLO 122 of the County Development Plan 2022 - 2028 including offices (SLO 122), medical centre, childcare, educational, local retail, cafe and community uses.*
- *Provide for a range of housing typologies, including houses, apartments, own door units and housing suitable for older persons and people with a disability (See Objective H2 in Chapter 3).*
- *Provide an accessible and inclusive community facility of c. 1,600 sq. metres in a building adjoining Rosemont Green. The uses should include a multi-*



*purpose hall, changing rooms, meeting rooms, unless otherwise agreed with dlr County Council.*

- *Provide for play facilities both formal (minimum of 2 playgrounds) and informal”*

The Masterplan provides for a residentially focused mix of uses, which includes residential development and complementary uses as per the site’s zoning objective and SLO122 of the County Development Plan, including medical centre, childcare, local retail, café/restaurant, community facility and enterprise centre.

The Masterplan provides for a range of housing typologies, including 1-bed to 3-bed apartment units, duplexes, own door units, homessuitable for older persons and those with disabilities.

Block 6, to the south of the site adjoining Rosemount Green, accommodates a community facility (1,749 sq m), which includes a multipurpose hall, changing facilities, meeting rooms and associated facilities. The design of the community facility was a result of extensive collaboration with DLRCC.

Two formal play spaces are provided in the public open space, one to the south and one to the north of the site.

#### 6.1.4 CMH KDA Environment Objectives

The following objectives relating to climate adaptation and mitigation are relevant:

*“CMH12 – Climate adaptation*

*Any redevelopment of the site shall provide a landscape and biodiversity strategy which protects and enhance the ecology of the site and shall include for the:*

- *Retention of the trees and treelines which contribution to heritage, landscape character, ecology and climate adaptation.*
- *Suitable supplementary planting.*
- *Retention of the existing drainage ditch on site which traverses the site towards the south-western corner of the walled garden.*
- *Provision of new habitats and nesting and roosting opportunities for birds and mammals.*
- *Management of invasive species.”*

The redevelopment of the site has been informed by the site’s landscape and biodiversity, with the project ecologist providing detailed advice during the design process.

Trees have been retained where possible, and carefully selected supplementary planting is also provided across the site.

The drainage ditch is retained and enhanced and new habitats are provided, including nesting and roosting opportunities.



See the enclosed AECOM *Landscape Design Report* and biodiversity inputs to the application including the Chapter 8 of the EIA (Biodiversity) and the Habitats Management Plan appendix to Chapter 8, prepared by Altamar.

Invasive species has been surveyed and an area of Himalayan Balsam has been identified, and an area of Three Cornered Leek (see enclosed Invasive Species Management Plan appended to Chapter 8 of the EIA (Appendix 8.10) prepared by Altamar).

*“CMH13 – Climate adaptation*

*Implement a surface water management strategy that provides a multi-level treatment train and which mimics natural processes to infiltrate and reuse surface water runoff, within the site curtilage, as much as possible.”*

The SuDs proposals have sought to provide a multi-level treatment train, with provision of integrated wetlands and other surface features. See the Infrastructure Report prepared by BMCE for further information.

*“CMH14 – Climate mitigation*

*Any redevelopment of the site shall:*

- *Promote the reuse of demolition and excavated materials on site.*
- *Encourage the use of district heating on this site along with suitable renewable energy technologies.”*

The Masterplan was designed with regard to climate mitigation.

The Waste Chapter of the EIA (Chapter 19) and the appended Resource Waste Management Plan (RWMP) details how the waste hierarchy will be implemented through prevention, and minimisation of waste, followed by preparing for reuse and recycling/recovery energy recovery and least favoured of all disposal. The RWMP details the options to reuse materials where possible.

The enclosed *Energy & Sustainability Report* prepared by EDC details the proposed central heating system proposed as part of the scheme, along with the use of PV panels as a renewable energy technology. Climate is also considered in Chapter 12 of the enclosed EIA.

## 7.0 CONCLUSION

In summary, the proposed development will provide for, inter alia, 934 No. apartments and supporting neighbourhood services on underutilised lands, in a built-up urban area in Dublin.

The development will make a strong contribution to housing delivery in the area by providing a significant quantum of residential units in a variety of housing types and sizes. The proposed non-residential uses and public open space will contribute to the Dundrum area from a placemaking perspective, providing a new destination, sensitively stitched into an existing community, for both future occupiers and existing residents.

We contend that the proposed development is generally in accordance with the following national and local policy documents:

1. *National Planning Framework (Ireland 2040 – Our Plan)*
2. *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031*
3. *Sustainable Residential Density and Compact Settlement Guidelines for Planning Authorities (2024)*
4. *Urban Design Manual: A Best Practice Guide (2009)*
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)*
6. *Childcare Facilities Guidelines (2001)*
7. *Part V of the Planning and Development Act 2000: Guidelines (2017)*
8. *Design Manual for Urban Roads and Streets (DMURS) (2019)*
9. *The Planning System and Flood Risk Management (2009)*
10. *Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*
11. *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*
12. *Department of the Arts, Heritage and the Gaeltacht ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011)*
13. *Housing for All – A New Housing Plan for Ireland (2021)*
14. *Climate Action Plan (2024)*
15. *Housing Delivery Action Plan 2022-2026*
16. *Dún Laoghaire-Rathdown County Council County Development Plan, 2022-2028*
17. *Dundrum Local Area Plan 2023*

### ***Environmental Impact Assessment Report***

The enclosed *Environmental Impact Assessment Report* identifies some residual negative impacts, namely in terms of Landscape and Visual Impact (Chapter 14) and Architectural Heritage (Chapter 17). However, no residual significant negative impacts are identified.

### **Landscape and Visual Assessment**

Whilst there may be a residual negative impact from certain views, the townscape impact of the development at operational stage is considered to be moderate/positive. An extract from the TVIA is provided below:

*“The campus style of the development allows for physical and visual permeability thorough the site where tree planting can be retained and supplemented. Furthermore the architectural design style varies between buildings giving an organic / evolved feeling that helps to integrate it more readily with the surrounding context. It is considered that these design objectives are successful in integrating this development within its townscape setting particularly in a relative sense against the existing baseline of a ‘perceptual void.’”*

Thus, the development of the site has a positive townscape impact, against which the assessment of localised negative impacts need to be balanced.

In relation to the Architectural Heritage impacts, Chapter 17 of the EIAR identifies that after Mitigation Measures the Impacts are:

- Moderately Negative for the Main Hospital Building, Perimeter Wall and Historic Landscape;
- Slightly Negative for the C20 Airing Sheds;
- Negligible for the Farmstead and Walled Garden; S
- lightly Beneficial for the Chapel; and
- Significantly Beneficial for the Gate Lodge.

However, these impacts are to be considered in the context of the need for change of use at the site, as it has been underutilised since the CMH relocated to a modern premises:

*“In order to achieve the outcome of the Central Mental Hospital site having a viable and long-term future, some level of harm to heritage significance has been found to be necessary. New developments in proximity to the Main Hospital Building and in the Historic Landscape, comprising multi-storey apartment blocks and associated infrastructure, will make significant changes to their context. The Perimeter Wall, currently contiguous except for the main entrance, will by necessity have new openings formed for pedestrian and vehicular access.*

*However, no part of the proposals will result in the total loss of significance for a heritage asset. The principal and defining features of the site will remain, and in some cases be enhanced by the development.*

*It is the conclusion that, with suitable and targeted mitigation measures, the proposed development of will therefore result in less than substantial harm to the heritage assets that lie within and in close proximity to the application site.”*

The Architectural Heritage Protection Guidelines advise that *“on the whole, the best way to prolong the life of a protected structure is to keep it in active use, ideally in its original use.”* The use of the site and historic buildings for the Central Mental Hospital has discontinued at this location as the service relocated to modern purpose-built facility. Therefore, a new viable long-term use of the buildings and site is required in order to ensure the ongoing active use and maintenance of the buildings and site. The gate lodge is proposed to be reused as a café, the adaptive reuse of the other historic buildings will be subject to a future planning application, as per the phasing of the Masterplan.

## **Daylight**

There are identified exceedances in the enclosed *Daylight and Sunlight – Impact on Neighbouring Properties Report* which incorporates a *Transient Overshadowing Assessment* and the *Daylight and Sunlight – Internal Daylight and Sunlight Report and Overshadowing Assessment* prepared by GIA.

The BRE Guidelines 2022 also clearly acknowledge that the guidance: “*is not mandatory and the guide should not be seen as an instrument of planning policy.*” The guidance also acknowledges in its introduction that “*Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...*”

The *Compact Settlement Guidelines, 2024*, acknowledge that daylight provision is only one of a number of considerations when considering the overall quality of the design and layout of a scheme and that any shortfalls should not automatically be a reason to refuse approval for a proposed development:

*“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”*

The proposed development provides a significant residential development at an underutilised urban site. The proposed development complies with the policy requirement to retain 25% of the site as public open space. The proposed development provides for an effective urban design and streetscape solution to the development of this site.

Further to this, the proposed buildings within the development have been given careful consideration in terms of site planning and the arrangement of apartments in each building in order to maximise the number of dual aspect apartments (50% of the total).

## **Separation Distances**

The windows of the proposed apartments all have a separation distance from windows of existing neighbouring buildings of more than 16m in accordance with SPPR1 (see Section 3.7 of the Architectural Design Report, which shows that the separation distances are 63m to the north; between 23m and 106m to the east; between 27m and 70m to the south; and between 21m and 38m to the east).

The scheme has been designed to ensure that the vast majority of the proposed units benefit from separation distances between proposed habitable rooms that accord with SPPR1, which states:

*“When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.”*

Section 3.7 of the enclosed *Architectural Design Report* identifies separation distances between units, a limited number of which are less than 16m. For example, between certain sections of Block 2 (4, 6, 7 and 9m); at the northern end of Block 4 (12-14m); between the northern end of Block 6 and southern edge of Block 8 (14m); between certain sections of Block 7 (8-14m); and between certain sections of Block 10 (9-13m). However, in these cases, where there are windows serving habitable rooms, these are not directly opposing each other but are staggered or at oblique angles, which provides suitable levels of privacy and prevents undue overlooking of habitable rooms and amenity spaces, as required by SPPR1. Thus, the proposed development is considered consistent with the requirements of the *Compact Settlement Guidelines 2024* in this regard.

### **Summary**

In summary, the proposed development will provide a significant and strategically important residential development, comprising 934 no. new homes. As well as responding to acute housing need, 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.

The redevelopment of the Central Mental Hospital lands directly delivers legislative provisions and national and regional planning policy objectives surrounding the delivery of housing. It complies with the overarching themes of the National Planning Framework by proposing a compact, well-designed, sustainable form of residential development on an underutilised suburban site, located in close proximity to a range of social and commercial facilities and public transport services. The proposed development is also considered to align with the pattern of development in the surrounding area

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





Appendix A

| Block           | Unit Number | Daylight Met / Not Met | Sunlight Met / Not Met | View Open Space | View of Trees | Dual Aspect | Plus 10% Oversized Apartment | UD / UD+ Unit | Plus 10% Amenity Space | Own Door |
|-----------------|-------------|------------------------|------------------------|-----------------|---------------|-------------|------------------------------|---------------|------------------------|----------|
| <b>Block 02</b> |             |                        |                        |                 |               |             |                              |               |                        |          |
| Block 02        | B02-00-01   | MET                    | NOT                    |                 | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-00-02   | MET                    | NOT                    |                 | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-00-03   | MET                    | NOT                    |                 | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-00-08   | MET                    | NOT                    |                 | Yes           | Yes         | Yes                          |               |                        | Yes      |
| Block 02        | B02-00-09   | MET                    | NOT                    |                 | Yes           | Yes         | Yes                          |               |                        | Yes      |
| Block 02        | B02-00-12   | NOT                    | MET                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-00-13   | NOT                    | MET                    | Yes             | Yes           |             |                              |               |                        | Yes      |
| Block 02        | B02-00-17   | MET                    | NOT                    | Yes             | Yes           | Yes         | Yes                          | Yes           |                        |          |
| Block 02        | B02-00-18   | NOT                    | NOT                    | Yes             | Yes           |             | Yes                          | Yes           |                        |          |
| Block 02        | B02-00-19   | NOT                    | NOT                    | Yes             | Yes           |             | Yes                          | Yes           |                        |          |
| Block 02        | B02-00-20   | MET                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-00-21   | NOT                    | MET                    | Yes             | Yes           | Yes         | Yes                          |               |                        |          |
| Block 02        | B02-00-22   | NOT                    | NOT                    | Yes             | Yes           |             |                              |               |                        |          |
| Block 02        | B02-00-23   | MET                    | NOT                    | Yes             | Yes           | Yes         | Yes                          | Yes           |                        |          |
| Block 02        | B02-00-28   | MET                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-00-29   | MET                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-01-01   | MET                    | NOT                    |                 | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-01-02   | MET                    | NOT                    |                 | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-01-06   | NOT                    | MET                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-01-07   | NOT                    | MET                    | Yes             | Yes           |             |                              |               |                        |          |
| Block 02        | B02-01-12   | MET                    | NOT                    | Yes             | Yes           |             | Yes                          |               |                        |          |
| Block 02        | B02-01-13   | NOT                    | NOT                    | Yes             | Yes           |             | Yes                          |               |                        |          |
| Block 02        | B02-01-14   | MET                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-01-16   | NOT                    | MET                    |                 | Yes           |             | Yes                          |               |                        |          |
| Block 02        | B02-02-03   | NOT                    | MET                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-02-04   | NOT                    | MET                    | Yes             | Yes           |             |                              |               |                        |          |
| Block 02        | B02-02-09   | MET                    | NOT                    | Yes             | Yes           |             | Yes                          |               |                        |          |
| Block 02        | B02-02-10   | MET                    | NOT                    | Yes             | Yes           |             | Yes                          |               |                        |          |
| Block 02        | B02-02-11   | MET                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-03-05   | MET                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-04-04   | NOT                    | NOT                    | Yes             | Yes           | Yes         |                              |               | Yes                    |          |
| Block 02        | B02-04-05   | NOT                    | NOT                    | Yes             | Yes           | Yes         |                              |               |                        |          |
| Block 02        | B02-B01-02  | NOT                    | NOT                    |                 | Yes           | Yes         |                              |               |                        |          |



|                 |            |     |     |     |     |     |     |     |  |     |
|-----------------|------------|-----|-----|-----|-----|-----|-----|-----|--|-----|
| Block 02        | B02-B01-12 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 02        | B02-B01-13 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 02        | B02-B01-15 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 02        | B02-B01-16 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 02        | B02-B01-01 | NOT | NOT |     | Yes | Yes |     | Yes |  | Yes |
| Block 02        | B02-B01-03 | NOT | NOT |     | Yes |     | Yes | Yes |  | Yes |
| <b>Block 03</b> |            |     |     |     |     |     |     |     |  |     |
| Block 03        | B03-00-01  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 03        | B03-00-02  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-00-03  | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-00-04  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-00-05  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-00-10  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 03        | B03-01-01  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 03        | B03-01-02  | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-01-03  | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 03        | B03-01-04  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 03        | B03-01-05  | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-08  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-09  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-10  | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-01-11  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-12  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 03        | B03-01-13  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 03        | B03-01-14  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-15  | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-01-16  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-17  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-01-18  | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 03        | B03-01-22  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 03        | B03-01-23  | NOT | MET | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-02-02  | NOT | MET | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-02-03  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 03        | B03-02-04  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 03        | B03-02-08  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-02-09  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-02-10  | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 03        | B03-02-11  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 03        | B03-02-12  | MET | NOT | Yes | Yes | Yes |     |     |  |     |



|          |           |     |     |     |     |     |     |     |  |  |
|----------|-----------|-----|-----|-----|-----|-----|-----|-----|--|--|
| Block 03 | B03-02-13 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 03 | B03-02-14 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-02-15 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-02-16 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-02-17 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-02-18 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 03 | B03-02-22 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-03-02 | NOT | MET | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-03-03 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-03-04 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-03-08 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-03-09 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-03-10 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-03-11 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-03-12 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 03 | B03-03-13 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 03 | B03-03-14 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-03-15 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-03-16 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-03-17 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-03-18 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 03 | B03-03-22 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-04-02 | NOT | MET | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-04-03 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-04-08 | MET | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-04-09 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-04-10 | MET | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-04-11 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-04-12 | NOT | MET | Yes | Yes | Yes |     |     |  |  |
| Block 03 | B03-04-13 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 03 | B03-04-14 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-04-15 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-04-16 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-04-17 | NOT | MET | Yes | Yes |     | Yes |     |  |  |
| Block 03 | B03-04-18 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 03 | B03-04-22 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-05-03 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 03 | B03-05-10 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 03 | B03-05-15 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |



|                 |           |     |     |     |     |     |     |     |     |  |
|-----------------|-----------|-----|-----|-----|-----|-----|-----|-----|-----|--|
| Block 03        | B03-06-03 | NOT | MET | Yes | Yes |     |     |     |     |  |
| Block 03        | B03-06-10 | NOT | NOT | Yes | Yes |     | Yes | Yes |     |  |
| Block 03        | B03-07-10 | MET | NOT | Yes | Yes |     | Yes | Yes |     |  |
| <b>Block 04</b> |           |     |     |     |     |     |     |     |     |  |
| Block 04        | B04-00-04 | NOT | NOT |     |     |     | Yes | Yes |     |  |
| Block 04        | B04-00-05 | NOT | NOT |     |     |     | Yes | Yes |     |  |
| Block 04        | B04-00-08 | NOT | NOT | Yes | Yes |     | Yes | Yes |     |  |
| Block 04        | B04-00-12 | NOT | NOT | Yes | Yes |     | Yes | Yes |     |  |
| Block 04        | B04-00-13 | NOT | MET | Yes | Yes |     | Yes | Yes |     |  |
| Block 04        | B04-00-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-00-02 | NOT | NOT | Yes | Yes |     |     |     |     |  |
| Block 04        | B04-00-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-00-06 | MET | NOT |     |     | Yes |     |     |     |  |
| Block 04        | B04-00-07 | NOT | MET | Yes | Yes |     |     |     |     |  |
| Block 04        | B04-00-11 | MET | NOT | Yes | Yes | Yes |     |     |     |  |
| Block 04        | B04-01-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-01-02 | NOT | NOT | Yes | Yes |     |     |     |     |  |
| Block 04        | B04-01-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-01-04 | NOT | NOT |     |     |     |     |     | Yes |  |
| Block 04        | B04-01-05 | NOT | NOT |     |     |     | Yes |     |     |  |
| Block 04        | B04-01-06 | MET | NOT |     |     | Yes |     |     |     |  |
| Block 04        | B04-01-07 | MET | NOT | Yes | Yes | Yes |     |     |     |  |
| Block 04        | B04-01-08 | NOT | NOT | Yes | Yes |     | Yes |     |     |  |
| Block 04        | B04-01-11 | MET | NOT | Yes | Yes | Yes |     |     |     |  |
| Block 04        | B04-01-12 | NOT | NOT | Yes |     |     | Yes |     |     |  |
| Block 04        | B04-02-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-02-02 | NOT | NOT | Yes | Yes |     |     |     |     |  |
| Block 04        | B04-02-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-02-04 | NOT | NOT |     |     |     |     |     | Yes |  |
| Block 04        | B04-02-05 | NOT | NOT |     |     |     | Yes |     |     |  |
| Block 04        | B04-02-08 | NOT | MET | Yes | Yes |     | Yes |     |     |  |
| Block 04        | B04-02-11 | MET | NOT | Yes | Yes | Yes |     |     |     |  |
| Block 04        | B04-02-12 | NOT | NOT | Yes |     |     | Yes |     |     |  |
| Block 04        | B04-03-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-03-02 | NOT | NOT | Yes | Yes |     |     |     |     |  |
| Block 04        | B04-03-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |
| Block 04        | B04-03-04 | MET | NOT |     |     |     |     |     | Yes |  |
| Block 04        | B04-03-12 | MET | NOT | Yes |     |     | Yes |     |     |  |
| Block 04        | B04-04-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |     |  |



|                 |           |     |     |     |     |     |     |     |  |     |
|-----------------|-----------|-----|-----|-----|-----|-----|-----|-----|--|-----|
| Block 04        | B04-04-02 | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 04        | B04-04-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 04        | B04-05-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 04        | B04-05-02 | MET | NOT | Yes | Yes |     |     |     |  |     |
| Block 04        | B04-05-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| <b>Block 05</b> |           |     |     |     |     |     |     |     |  |     |
| Block 05        | B05-00-03 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 05        | B05-00-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  | Yes |
| Block 05        | B05-00-02 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-00-04 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-00-14 | NOT | NOT | Yes | Yes | Yes | Yes | Yes |  | Yes |
| Block 05        | B05-01-01 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-01-02 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-03 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-01-04 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-01-08 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-09 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-10 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-11 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-12 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-01-13 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 05        | B05-01-14 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-15 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-16 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-01-21 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-01-22 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-02-01 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-02-02 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-02-03 | MET | NOT | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-02-04 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-02-07 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-02-08 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-02-09 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-02-13 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 05        | B05-02-14 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-02-15 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-02-21 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-03-02 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-03-03 | NOT | MET | Yes | Yes |     |     |     |  |     |



|                 |           |     |     |     |     |     |     |     |  |     |
|-----------------|-----------|-----|-----|-----|-----|-----|-----|-----|--|-----|
| Block 05        | B05-03-04 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-03-06 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-03-07 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 05        | B05-03-08 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-03-09 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-03-13 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 05        | B05-03-15 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 05        | B05-04-03 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 05        | B05-04-09 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| <b>Block 06</b> |           |     |     |     |     |     |     |     |  |     |
| Block 06        | B06-00-03 | NOT | MET | Yes | Yes |     | Yes | Yes |  |     |
| Block 06        | B06-01-02 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 06        | B06-01-03 | NOT | MET | Yes | Yes |     | Yes | Yes |  |     |
| Block 06        | B06-01-04 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 06        | B06-02-09 | NOT | MET | Yes | Yes |     |     |     |  |     |
| <b>Block 07</b> |           |     |     |     |     |     |     |     |  |     |
| Block 07        | B07-00-07 | NOT | MET |     | Yes |     | Yes | Yes |  | Yes |
| Block 07        | B07-00-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  | Yes |
| Block 07        | B07-00-02 | NOT | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 07        | B07-00-03 | NOT | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 07        | B07-01-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 07        | B07-01-02 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-01-03 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-01-04 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-01-05 | NOT | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-01-06 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-01-08 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-01-09 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-01-10 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 07        | B07-01-11 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-01-12 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-01-13 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-01-14 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-01-15 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-01-20 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-01-21 | NOT | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-01-22 | MET | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-01-23 | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-01-24 | MET | NOT | Yes | Yes |     | Yes |     |  |     |





|          |           |     |     |     |     |     |     |     |  |  |
|----------|-----------|-----|-----|-----|-----|-----|-----|-----|--|--|
| Block 07 | B07-01-25 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-01-26 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-01-27 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-01-28 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-01-29 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-01-30 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-01-31 | NOT | NOT | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-01-32 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-01-33 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-02-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 07 | B07-02-02 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 07 | B07-02-03 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-02-04 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-02-07 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-08 | NOT | MET | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-02-10 | NOT | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 07 | B07-02-13 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-14 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-20 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-02-21 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 07 | B07-02-22 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |  |
| Block 07 | B07-02-23 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-24 | NOT | MET | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-02-26 | NOT | NOT | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-27 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-02-28 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-02-29 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-02-30 | NOT | NOT | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-31 | NOT | NOT | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-02-32 | NOT | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-03-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 07 | B07-03-02 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 07 | B07-03-03 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-03-04 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 07 | B07-03-07 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 07 | B07-03-08 | NOT | MET | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-03-10 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 07 | B07-03-11 | NOT | MET | Yes | Yes |     | Yes |     |  |  |
| Block 07 | B07-03-12 | NOT | MET | Yes | Yes |     | Yes |     |  |  |



|                 |           |     |     |     |     |     |     |     |  |     |
|-----------------|-----------|-----|-----|-----|-----|-----|-----|-----|--|-----|
| Block 07        | B07-03-20 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-03-21 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-03-22 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 07        | B07-03-25 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-03-26 | MET | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-03-27 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-03-29 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-03-30 | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-03-31 | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-03-32 | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-04-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 07        | B07-04-02 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-04-03 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-04-04 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-04-07 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-04-10 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 07        | B07-04-11 | MET | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-04-14 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-04-15 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-04-20 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-04-21 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-04-22 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 07        | B07-04-26 | MET | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-04-30 | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-04-31 | NOT | NOT | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-05-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 07        | B07-05-02 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-05-03 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-05-04 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-05-14 | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 07        | B07-05-15 | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 07        | B07-05-20 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-05-21 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 07        | B07-05-22 | NOT | MET | Yes | Yes |     | Yes | Yes |  |     |
| Block 07        | B07-06-11 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 07        | B07-06-12 | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| <b>Block 08</b> |           |     |     |     |     |     |     |     |  |     |
| Block 08        | B08-00-02 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-03 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |



|                 |           |     |     |     |     |     |     |     |  |     |
|-----------------|-----------|-----|-----|-----|-----|-----|-----|-----|--|-----|
| Block 08        | B08-00-04 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-05 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-06 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-07 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-08 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-09 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-10 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-00-11 | NOT | NOT | Yes | Yes | Yes | Yes | Yes |  | Yes |
| Block 08        | B08-00-12 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 08        | B08-01-03 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-04 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-05 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-06 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-07 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-08 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-09 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-10 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 08        | B08-01-11 | NOT | NOT | Yes | Yes | Yes | Yes |     |  | Yes |
| Block 08        | B08-01-12 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| <b>Block 09</b> |           |     |     |     |     |     |     |     |  |     |
| Block 09        | B09-00-01 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-02 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-03 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-04 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-05 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-06 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-07 | NOT | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-00-08 | MET | NOT | Yes | Yes | Yes |     | Yes |  | Yes |
| Block 09        | B09-01-01 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-02 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-03 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-04 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-05 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-06 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-07 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| Block 09        | B09-01-08 | MET | NOT | Yes | Yes | Yes |     |     |  | Yes |
| <b>Block 10</b> |           |     |     |     |     |     |     |     |  |     |
| Block 10        | B10-00-02 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 10        | B10-00-03 | NOT | NOT | Yes | Yes |     | Yes | Yes |  |     |



|          |            |     |     |     |     |     |     |     |  |     |
|----------|------------|-----|-----|-----|-----|-----|-----|-----|--|-----|
| Block 10 | B10-00-06  | NOT | MET |     | Yes |     | Yes | Yes |  |     |
| Block 10 | B10-00-10  | MET | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 10 | B10-00-11  | MET | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 10 | B10-00-13  | MET | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 10 | B10-B01-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 10 | B10-B01-02 | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-B01-03 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  | Yes |
| Block 10 | B10-00-01  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-00-23  | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 10 | B10-00-04  | NOT | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-00-24  | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 10 | B10-00-14  | MET | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 10 | B10-00-09  | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 10 | B10-00-17  | MET | NOT | Yes | Yes |     | Yes | Yes |  |     |
| Block 10 | B10-00-12  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-00-15  | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 10 | B10-00-25  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-00-16  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-00-22  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-01  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-02  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 10 | B10-01-03  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 10 | B10-01-04  | NOT | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-09  | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |     |
| Block 10 | B10-01-10  | MET | NOT | Yes | Yes |     | Yes |     |  |     |
| Block 10 | B10-01-11  | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 10 | B10-01-12  | NOT | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-14  | NOT | MET | Yes | Yes |     |     |     |  |     |
| Block 10 | B10-01-15  | NOT | MET | Yes | Yes |     | Yes |     |  |     |
| Block 10 | B10-01-17  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-18  | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 10 | B10-01-19  | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 10 | B10-01-20  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-31  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-01-32  | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 10 | B10-01-33  | MET | NOT | Yes | Yes | Yes | Yes |     |  |     |
| Block 10 | B10-01-34  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-02-01  | MET | NOT | Yes | Yes | Yes |     |     |  |     |
| Block 10 | B10-02-02  | NOT | NOT | Yes | Yes |     | Yes |     |  |     |



|          |           |     |     |     |     |     |     |     |  |  |
|----------|-----------|-----|-----|-----|-----|-----|-----|-----|--|--|
| Block 10 | B10-02-03 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 10 | B10-02-09 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 10 | B10-02-10 | MET | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 10 | B10-02-11 | MET | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 10 | B10-02-12 | NOT | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-02-14 | NOT | MET | Yes | Yes |     |     |     |  |  |
| Block 10 | B10-02-17 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-02-18 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-02-19 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-02-20 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-02-31 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-02-32 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-02-33 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-02-34 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-03-01 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-03-02 | MET | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 10 | B10-03-03 | MET | NOT | Yes | Yes |     |     |     |  |  |
| Block 10 | B10-03-04 | NOT | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-03-06 | NOT | MET |     | Yes |     | Yes |     |  |  |
| Block 10 | B10-03-14 | MET | NOT | Yes | Yes |     |     |     |  |  |
| Block 10 | B10-03-15 | MET | NOT | Yes | Yes |     | Yes |     |  |  |
| Block 10 | B10-03-16 | MET | NOT |     | Yes | Yes | Yes | Yes |  |  |
| Block 10 | B10-03-17 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-03-23 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-03-24 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-03-25 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-03-26 | MET | NOT |     | Yes | Yes |     |     |  |  |
| Block 10 | B10-04-01 | MET | NOT | Yes | Yes | Yes | Yes | Yes |  |  |
| Block 10 | B10-04-04 | NOT | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-04-14 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-04-15 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-04-16 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-04-17 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-04-23 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-04-24 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-04-25 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |
| Block 10 | B10-04-26 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-05-14 | MET | NOT | Yes | Yes | Yes |     |     |  |  |
| Block 10 | B10-05-15 | MET | NOT | Yes | Yes | Yes | Yes |     |  |  |



|          |           |     |     |     |     |     |     |  |  |  |
|----------|-----------|-----|-----|-----|-----|-----|-----|--|--|--|
| Block 10 | B10-05-16 | MET | NOT | Yes | Yes | Yes | Yes |  |  |  |
| Block 10 | B10-05-17 | MET | NOT | Yes | Yes | Yes |     |  |  |  |
|          |           |     |     |     |     |     |     |  |  |  |