

Statement of Response to An Bord Pleanála Opinion

Proposed SHD

**Lands at The Grange,
Brewery Road/Stillorgan Road,
Stillorgan, Blackrock,
Co. Dublin**

On behalf of

**KW PRS ICAV acting for and on behalf of
its sub-fund KW PRS Fund 10**

September 2019



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1 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Statement of Response on behalf of **KW PRS ICAV acting for and on behalf of its sub-fund KW PRS Fund 10, 94 St. Stephen's Green, Dublin 2, D02 FD40** for a proposed Strategic Housing Development (SHD) relating to a Build to Rent (BTR) residential development of 287 residential units, a crèche facility and residential tenant amenity space, all at site of c. 1.8 ha, on lands at **The Grange, Brewery Road/Stillorgan Road, Stillorgan, Blackrock, Co. Dublin.**

This Statement of Response is lodged as an accompanying report for the subject proposal and should be read in conjunction with all plans and particulars submitted as part of the overall planning application.

This response has been prepared with direct input from:

- O'Mahony Pike, Design Architects
- Waterman Moylan Consulting Engineers
- Mitchell & Associates, Landscape Architects
- ARC Architectural Consultants
- Awn Consulting Limited
- Scott Cawley Ecologists

Where appropriate, formal response pieces are prepared by the above consultants and are enclosed herewith for reference purposes. This report aims to deliver an overview of all matters for the convenience of An Bord Pleanála.

2 DESIGN EVOLUTION - RESPONSE TO CONSULTATION

For clarity, we wish to set out the key points associated with the evolution of the design currently before the An Bord Pleanála.

From the outset, we wish to highlight that the design of the proposal and specifically the interface at Brewery Road has evolved significantly from the pre-planning stage of development. Initial concerns raised by the Planning Authority have been comprehensively reviewed and the revised treatment along Brewery Road has addressed all points raised. The proposal, as currently submitted delivers a new public realm, which provides for legibility and a high - quality suburban streetscape. We submit that the proposal now being submitted greatly enhances a sense of place along the Brewery Road frontage. The new environment is pedestrian friendly, easily navigated and fully permeable. The buildings address the street and have an active edge, which is a notable improvement on the current environment.

We note specifically the following changes to the development following the pre-planning stage of the project:

- The design of the proposal and specifically the interface at Brewery Road has evolved significantly from the pre-planning stage of developments. Initial concerns raised by the Planning Authority have been comprehensively reviewed and the revised treatment along Brewery Road has addressed all points raised. The proposal, as currently submitted delivers a new public realm, which provides for legibility and a high - quality suburban streetscape.
- Since pre-application stage, the Bord will note that there has been some notable design improvements which directly impact on the scheme's relationship with Brewery Road. These include:
 - Increased separation distances of between the proposed development and existing residential development at Brewery Road.
 - Podium heights have been reduced resulting in a significant improvement for accessibility and connectivity within the scheme.
 - Set backs to boundary, to the kerbside along Brewery Road and to Lawnswood Park have been greatly improved and are considered more than appropriate for this suburban context.
 - A revised landscaping proposal has been prepared which includes defensible apartment spaces, new road side planting, public access routes to traverse the scheme and the retention of trees at the entrance to the site.
 - The treatment along brewery Road consists of a cycle path along Brewery Road with defensible planting separating the cycle path from a pedestrian footpath. The building line remains staggered to deliver appropriate treatment and interest at street level.
- The current proposal now provides for the consolidation of the Brewery Road frontage, which is a critical consideration in the assessment of the matter of visual impact and height along Brewery Road. The design has considered the visual impact and relationship at this location in detail and we are confident that the inclusion of additional lands in the current planning application in comparison to historic planning application for this site, has delivered a more integrated public realm addresses previous concerns as set out by the Bord.
- The buildings have been sited to address the Road providing animation and access to the heart of the scheme. Permeability is now a core concept and the scheme is highly accessible throughout. The buildings are designed as a series of pavilions of varying height, with the breaks in volume indicating points of entry. Two wide lower blocks frame the entrance road, redefined as the development's new front door.
- The development will provide animation and supervision along Brewery Road in addition to full permeability with a series of punctuated access points into the scheme.

These key changes are set out in full detail in the enclosed material from O'Mahony Pike Architects and specifically the documents entitled 'Design Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion' and the relevant 'Design Statement'.

3 REQUIREMENT FOR THIS REPORT

This report is a response to the issues raised by An Bord Pleanala following the pre-application process for Strategic Housing Development planning application on the subject site. ABP Pre-Application Reference ABP-304147-19 refers.

An Bord Pleanala clearly set out the following in the formal 'Notice of Pre-Application Consultation Opinion' issued:

"An Bord Pleanala has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into constitute a reasonable basis for an application for strategic housing development."

The opinion further set out specific information that should be submitted with the application. Section 3 of this report sets out a comprehensive Design Team response to the requested items.

In addition, the opinion set out that the applicant is requirement to notify the following authorities in the event of the making of an application:

- Irish Water
- Transport Infrastructure Ireland
- Coras Iompair Eireann
- National Transport Authority
- Dun Laoghaire Rathdown County Childcare Committee

We can confirm that the prescribed bodies identified by An Bord Pleanala have been contacted and a full copy of the planning application currently under consideration has been furnished.

4 SPECIFIC INFORMATION REQUESTED

An Bord Pleanála is of the opinion that the documents submitted at consultation stage constitute a reasonable basis for an application. Notwithstanding this, specific information was requested and we now set out how each item has been positively addressed by the design team.

4.1 Item 1

A report including CGIs, visualisations and cross sections, as necessary, which clearly show the relationship between the proposed development and the existing development on Brewery Road. Details should include rationale/justification for the heights and set backs proposed; the interface between the proposed development and Brewery Road; boundary treatments; public realm and ground floor elevational treatments. Details should also be included of the relationship between the proposed heights and any future development on adjacent lands at the junction of the N11/Brewery Road.

O'Mahony Pike Architects have set out a detailed response to this item in the enclosed report entitled 'Design Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion'. The response is supplemented with CGIs, visualisations and cross sections as appropriate, which clearly demonstrates the relationship of the proposal with existing development along Brewery Road. The report sets out a detailed response framed around the following headings:

- Relationship with Existing Development
- Heights
- Set Backs
- Interface
- Boundary Treatments/Public Realm
- Ground Floor Elevational Treatments
- Future Development

A brief synopsis of the key points are set out below for the purposes of this overall response piece to the An Bord Pleanála opinion. We trust that the competent authority will consider the OMP response document in full in response to this item.

Relationship with Existing Development

The following key points are notable with regard to Lawnswood Park at Brewery Road:

- The gardens associated with No.s 14 - 29 Lawnswood back on to Brewery Road with garden depths ranging from 20m opposite Block N (6-7 storeys) to 45m opposite Block H (7-11 storeys). These gardens are framed by mature trees along the rear boundary line fronting on to Brewery Road, which provide a visual buffer to the proposal.
- The proposed blocks are set back between 44m (Block N) and 65-68 m (Blocks H & J) from the rear of existing houses on Lawnswood Park, which are significant distances in a suburban context.
- Within Block N, internal layouts have been designed so that the main living room windows of the apartments along Brewery Road, face away with balconies facing onto the existing open space and new entrance road.
- The Sunlight analysis prepared by ARC Architectural Consultants confirms a negligible impact on existing houses at Lawnswood Park.
- Overall, ARC's analysis on the visual impact of the development (as set out in Chapter 12 of the EIAR, page 17) indicates that the impact of the proposed development on views from Brewery Road will range from none to "slight" to "moderate". Under a worst case scenario, having regard to the character of development already constructed on the application site and along

the N11 corridor and having regard to the *Urban Development and Building Height Guidelines*, the impact of the proposed development on views from lands east of the N11 is considered to be consistent with emerging trends for development and, therefore, “moderate” in extent.

Heights

The context for height along Brewery Road, has been largely informed by (a) the recent policy mandate for increased building heights and densities at appropriate locations (public transport corridors) and (b) the preparation of a suite of reports which have set the limiters for heights achievable without impacting on the existing site context. These include a Daylight and Sunlight Analysis from ARC Architectural Consultants, a Wind and Microclimate Assessment from BFluid and OMP modelling of the development in terms of scale, massing and form.

Heights along Brewery Road are as follows:

- Block J (5-10 storeys)
- Block H (7-11 storeys)
- Block M (4-9 storeys)
- Block N (6-7 storeys)

The proposals for height have been examined in detail vis a vis policy contained within Appendix 9 – Building Height Strategy of the Development Plan, the Building Height Guidelines of 2018 and the National Planning Framework and the enclosed documentation from Brock McClure confirms that the proposal fully complies with the various requirements.

From a design perspective, we note the following comment from OMP Architects as set out in the ‘Response to An Bord Pleanála’s notice of Pre-Application Consultation Opinion’:

- “The heights along Brewery Road are carefully modulated.
- The buildings are designed as a series of pavilions of varying height and width, with the break in volume indicating points of entry.
- Two wide lower blocks (H and N, 7 storey) frame the entrance road, redefined as the development’s new front door.
- Tallest block along the road (J, 9+1 storey) sits where distances to houses of Woodward Lawn is greatest (65m).
- Small element of block J is of reduced scale (5 storey) to mitigate impact on existing cottage not in the ownership of the applicant.”

The following image from OMP identifies this relationship:

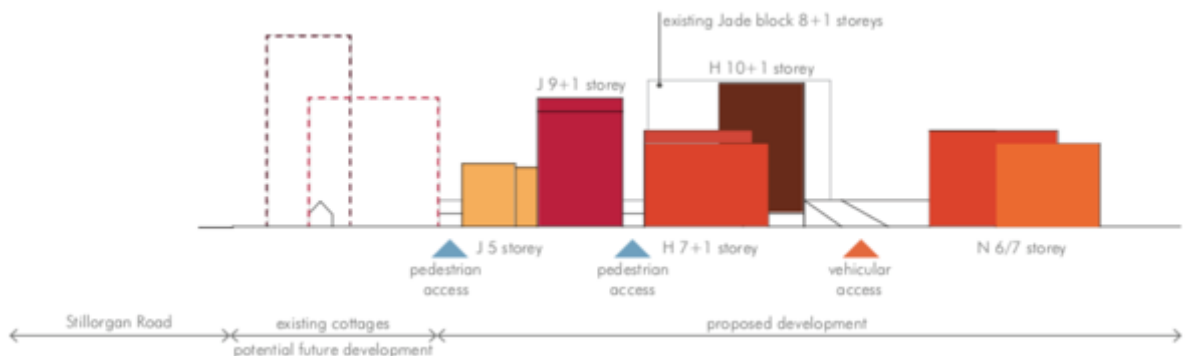


Figure 1 - Modulation of Heights along Brewery Road

It is evident from the above, that the heights proposed in this case have been carefully considered and it is the view of the applicant and design team that the site can successfully absorb the heights proposed. It is evident due to the change in levels across the site, the new proposed Block H sits in line with the existing

Jade Block. Furthermore, documentation enclosed herewith has confirmed that there is no significant impact from the heights proposed on exiting levels of residential amenity, which is a significant factor for consideration in assessment of the matter.

Set Backs

The set backs of the development from Brewery Road and Lawnswood Park have been given significant attention throughout the design process and have been subject to a final design iteration following the conclusion of the pre-planning stage with ABP. For clarity, the extent of set - backs now proposed at this location are set out below:



Figure 2 - Proposed Setbacks along Brewery Road

Key points of note in relation to proposed set - backs at this location are set out below:

- The proposal is arranged as a set of pavilion buildings forming a staggered edge to Brewery Road, both in plan, layout and height.
- Heights are modulated to acknowledge the transition in scale to Brewery Road.
- The buildings have been set back a further 2.5m from Brewery Road (orange outline above identifies the original intended proposal).
- Blocks H and J are now located c.8m from the site boundary and c. 14-15m from the kerb of Brewery Road, which is a significant improvement. This set back distance increases to c. 34m for Block H at the entrance to the site.
- Block N is set back 1.5m from the site boundary and c.8m from the kerb edge along Brewery Road.
- The blocks are set back between 44m (Block N) and 65-68m (Blocks H&J) from the rear of the existing houses on Lawnswood Park.

Overall, set backs to boundary, to the kerbside along Brewery Road and to Lawnswood Park have been greatly improved and are considered more than appropriate for this suburban context. Again, supporting documentation enclosed herewith including a Daylight and Sunlight Analysis and Wind and Microclimate Assessment have confirmed that the set backs proposed are appropriate to the site context.

Interface

The interface of the proposal with Brewery Road has also been an area of focus for the design team. The OMP ABP response document has clearly set out that Brewery Road is currently lined by tall walls on either side. The proposal and design objective of the current scheme is to deliver a permeable edge and interface at this location by way of pedestrian connectivity and views through the scheme.

Significant improvements have been incorporated into the scheme and specifically the reduction to podium level within the development, which has significantly improved accessibility and the interface along Brewery Road.

As set out above, the design and layout of the proposal is one where the buildings are set out as a series of pavilion blocks of varying heights and set-backs with breaks in the volume and massing of the development to indicate points of entry. This approach is as outlined below:

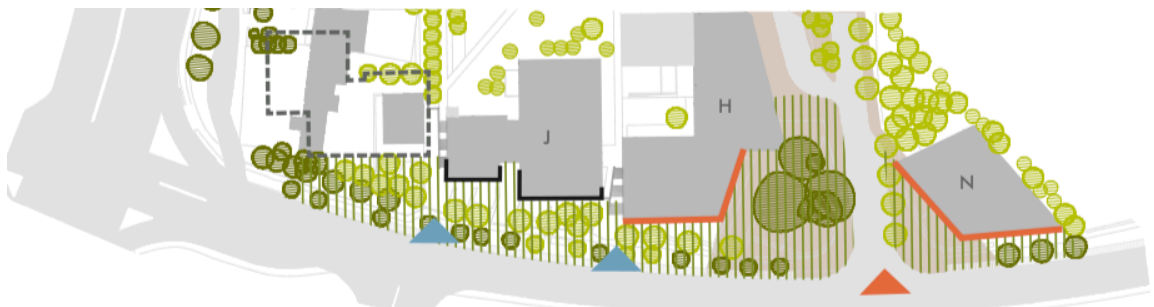


Figure 3 - Interface along Brewery Road

Two wide lower blocks frame the entrance road, redefined as the development's new 'front door', which is a significant planning gain for the Brewery Road context. The development will further deliver animation, supervision and passive surveillance at this location, which is to be welcomed given the current context of high walls and wide pavements. The new front door interface along Brewery Road is set out below.



Figure 4 - Revised entrance treatment to the Development



Figure 5 - CGI Image of new entrance proposals

In terms of the grain of the development, the staggered volume of the pavilion blocks delivers interest and character at street level. The two gateway blocks are broader and lower and fan away from the road to offer a generous entrance.

In terms of permeability and activity, there are gaps between the buildings to provide pedestrian connections between the inner gardens of the development and Brewery Road. The existing access road (currently a secondary access to the development) will become the scheme's new front door with a new concierge and residential amenity area.

A pair of gateway buildings (H and N) are positioned either side of an entrance plaza designed around a cluster of existing mature trees. The existing access road is realigned to provide greater clarity and enhance the public open space provision. The new entrance will also deliver a direct visual and pedestrian connection to the existing garden within the existing Grange development. A set down area is also proposed by the new concierge and residential amenity facility in Block H. Adequate surface car parking (8 spaces) are also delivered to service the creche.

The permeability of the development is further set out below.



Figure 6 - Permeability of the Development

Boundary Treatments/Public Realm

The boundary treatment and public realm along Brewery Road has been subject to a high quality design prepared by Mitchell & Associates.

Existing boundary walls are removed from Brewery Road to form a permeable and generous tree-lined edge. Existing trees are retained and supplemented to retain a mature setting. Planting proposals will act as a new buffer between the apartments and the road and will provide shade and privacy.

The interface between the public and private / semi-private areas is a key consideration to the success of the residential development. It is proposed that a level difference together with densely planted gardens will be the principle instrument utilised to clearly define the public realm from the private zones. Angular hedge planting provides for privacy and screening from Brewery Road. Strategically located large tree planting will be incorporated along the front gardens together with small-medium sized trees and ornamental or native groundcover and shrub planting. “

- The boundary between the existing Leopardstown Park will mainly consist of the retention of the existing fence in conjunction with a substantial amount of new semi mature native deciduous and evergreen tree planting (please refer to the boundary tree planting replacement proposals, the tree planting plan and landscape sections. An opening will be created in the fence to create a physical link between the park and the Grange development. (refer to proposal showing the link with the park). The opening will not be gated and will be open 24/7.

- The boundary treatment with the existing office building to the East consists mainly of semi mature and standard native tree planting to replace the trees that needed to be removed due to their poor condition. (refer to the boundary tree planting replacement proposals and the tree planting plan and landscape sections). The existing steps up to the existing Grange podium are widened and a lift proposed to enhance connectivity through the development.
- The boundary with the N11 is formed by a wildflower meadow area through which a meandering path physically connects the N11 with the podium. A section of the wall will be demolished to create this link. Informal seating is placed for resting and bug hotels are placed to create additional interest and enhance the biodiversity of the development.

Ground Floor Elevational Treatments

Elevations on Brewery road have been carefully designed to provide interest and overlooking, as well as protecting the privacy of the new residents. The scheme is designed as a series of pavilions of varying height and width. Similarly, fenestration at the lower levels varies block by block as single storey or double storey element, adding a finer grain and scale to the blocks.

Windows are generous, and located on all sides of the blocks to provide overlooking and maximise the diversity of views and orientation for the apartments. A 1.5m defensible space is provided for all the apartments of blocks H and J. Further planting and setbacks will add privacy.

The ground floor elevations are further animated by steps and lifts connecting to the inner landscape beyond, and entrance lobbies. The ground floor of block H, which hosts the concierge and resident's amenities will be clad in stone along the realigned access road and the pedestrian spine, to denote its special nature and add interest. Framed balconies of varying height add scale variation and depth to the facades.

The images below set out this relationship:



Figure 7 - Ground Floor Elevation Treatment



Proposed elevations on Brewery Road - Trees removed for legibility



Block H's lower levels as seen from the site's entrance



Block J's lower levels and steps to the inned communal garden

Figure 8 - Ground Floor Elevation Treatment

Future Development

The lands within the applicant's control do not extend to include No. 1 The Grange Cottage, which restricts delivery of a fully consolidated approach to development along the N11 frontage. This current application therefore relates to a Phase 1 development on lands that can deliver critically required residential units. OMP Architects have developed a phased Masterplan approach to provide an indicative future context for consideration and it is anticipated that a further c. 200 units can be delivered as part of a Phase 2 development.

In the interest of clarity, the OMP documentation submitted herewith has included reference to the future Phase 2 development. It is anticipated that this future development will complete the Brewery Road elevation.

OMP Architects have set out that the form of the proposed development allows for logical and seamless connection to potential additional development, should the cottage not in the ownership of the applicant become available for development at some point in the future and the terrace removed. Potential future development could complete the frontage to Brewery Road and provide same to the N11, as well as a possible landmark building at the corner. The car park and garden over could continue to the N11 boundary, along with the theme of pedestrian & visual permeability which informs the current proposal.

The images below show how this could be delivered.



Figure 9 - Future Development Potential

Summary

The key points to note regarding the scheme's relationship to Brewery Road, are as follows:

- The design of the proposal and specifically the interface at Brewery Road has evolved significantly from the pre-planning stage of developments. Initial concerns raised by the Planning Authority have been comprehensively reviewed and the revised treatment along Brewery Road has addressed all points raised. The proposal, as currently submitted delivers a new public realm, which provides for legibility and a high - quality suburban streetscape.
- Since pre-application stage, the Bord will note that there has been some notable design improvements which directly impact on the scheme's relationship with Brewery Road. These include:
 - Increased separation distances of between the proposed development and existing residential development at Brewery Road.
 - Podium heights have been reduced resulting in a significant improvement for accessibility and connectivity within the scheme.

- Set backs to boundary, to the kerbside along Brewery Road and to Lawnswood Park have been greatly improved and are considered more than appropriate for this suburban context.
- A revised landscaping proposal has been prepared which includes defensible apartment spaces, new road side planting, public access routes to traverse the scheme and the retention of trees at the entrance to the site.
- The treatment along brewery Road consists of a cycle path along Brewery Road with defensible planting separating the cycle path from a pedestrian footpath. The building line remains staggered to deliver appropriate treatment and interest at street level.
- The current proposal now provides for the consolidation of the Brewery Road frontage, which is a critical consideration in the assessment of the matter of visual impact and height along Brewery Road. The design has considered the visual impact and relationship at this location in detail and we are confident that the inclusion of additional lands in the current planning application in comparison to historic planning application for this site, has delivered a more integrated public realm addresses previous concerns as set out by the Bord.
- The buildings have been sited to address the Road providing animation and access to the heart of the scheme. Permeability is now a core concept and the scheme is highly accessible throughout. The buildings are designed as a series of pavilions of varying height, with the breaks in volume indicating points of entry. Two wide lower blocks frame the entrance road, redefined as the development's new front door.
- The development will provide animation and supervision along Brewery Road in addition to full permeability with a series of punctuated access points into the scheme.

4.2 Item 2

A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically with regards to overlooking, overshadowing, overbearing and noise. The report shall include full and complete drawings including levels and cross sections showing the relationship between the proposed development and adjoining residential development. Furthermore, landscape and architectural drawings that clearly detail the relationship between wind impact mitigation measures and the design of the proposed development shall be included.

O'Mahony Pike Architects have set out a detailed response to this item in the enclosed report entitled 'Design Response to An Bord Pleanala's Notice of Pre-Application Consultation Opinion'.

In addition, we refer An Bord Pleanala to the enclosed Daylight and Sunlight Analysis and Landscape and Visual Impact Assessment from ARC Architectural Consultants; the Wind and Microclimate Assessment from BFluid; the noise assessment from AWN Consulting; all of which are included in the Environmental Impact Statement enclosed herewith. These inputs are key considerations in terms of the impact on existing and proposed levels of residential amenity.

From the outset of this overall response piece, we wish to set out that the subject application is a high - quality development with exceptional levels of residential amenity proposed for future occupants.

Kennedy Wilson are recognised as setting the standard in terms of development and operation of larger scale Build to Rent schemes in Ireland centred around the provision of sustainable, high quality accommodation, resident amenities and professional management. Kennedy Wilson currently manage over 2,400 apartments in Ireland with a further 1,500 units in design or under construction. Kennedy Wilson's award-winning developments have been identified as exemplar projects by local authorities, government agencies and internationally accredited industry groups across design, build quality, resident amenities, public realm and placemaking.

As a long-term owner and operator of over 28,000 units worldwide Kennedy Wilson understand the importance of ensuring future resident experience is factored into the design process from inception. Kennedy Wilsons objective is to create vibrant communities and neighbourhoods where residents will

want to live.

The design objective for the current proposal at the Grange has been set as one which involves the creation of a vibrant community; quality residential amenity facilities; and an exceptional landscape design. In this regard the proposal is considered successful in its integration with the built element at the Grange and is framed by a detailed masterplan prepared by OMP Architects. The current proposal shall significantly improve the overall Grange Campus without prejudicing the master plan vision for the site and delivers crucial residential amenities including a creche facility, link to the adjacent parkland and residential amenity area of significant size.

The following issues are now considered:

- Overlooking
- Overshadowing
- Over Bearing Impact
- Noise

Overlooking

No. 1 The Grange

The design team has given careful attention to the scale and impact of any proposal vis - a - vis No. 1 The Grange Cottage and properties at Brewery Road. From the outset of this response piece, we can confirm that the applicant has engaged with owner of No.1 The Grange Cottages and has discussed the proposals currently submitted with the landowner in detail. The Grange Cottages are considered particularly sensitive and the design has from the outset aimed to deliver on an appropriate relationship at this location. No. 1 The Grange Cottage is the main area of focus for the applicant in terms of sensitivity given that No.s 2 and 3 The Grange Cottage is within the ownership of the applicant.

Development closest to the boundary with No.1 Grange Cottages is no more than 4 storeys in height and generous separation distances have been provided, with no development closer than 24.8m from the cottage. The internal layouts of the blocks are designed to avoid any undue overlooking, with living spaces and balconies orientated towards the central amenity space.

In addition, the design has purposefully delivered a significant area of public open space to the rear of the cottage, which ensures that existing levels of residential amenity are maintained for this property. Appropriate screening will be delivered between the proposed public open space area and the cottage to ensure that existing levels of residential amenity and privacy are maintained for the cottage.

The current proposed application has considered the planning history of the site in relation to previous refusals and key issues in the context.

A nursing home, standing 8m away from the cottage, was permitted as part of the parent application.

Whilst the most recent refusal on the site referred to an amendment to that application (the current proposal is a standalone application), there are valuable points to be taken from the case.

Block J and M and No. 1 The Grange Cottage -

Block J is located 24.8m away from the existing cottage not in the ownership of the applicant. Block J was designed so no window (living room or bedroom) directly overlooks the cottage. Living rooms and bedrooms overlook the central communal garden.

Block M is at a minimum of 32m from the cottage. Landscaping buffer area between the communal central garden and the garden wall of the cottage incorporate shrubs and trees for further shielding.

Blocks M and J have a few windows on their North East elevations for overlooking and animation of the facades, but numbers are limited to protect the cottage's amenity, and allow for potential future development should the lands become available.

Lawnswood Park

The two storey houses on the far side of Brewery Road (Lawnswood Park) are sited generally 44-68m from the proposed new buildings. This is considered to be a significant separation distance in a suburban context and we note that the technical assessments in relation to visual impact, daylight and overshadowing do not indicate any negative impact on the existing dwellings in this regard.

The response piece for Item 1 of this document also sets out that within Block N, internal layouts have been design so that he main living room windows of the apartments along Brewery Road, face away with balconies facing onto the existing open space and new entrance road.

Existing Grange Development

Appropriate Separation Distances are delivered within the scheme and considered exceptional for a suburban location.

The following figure sets out a summary of the various separation distance relationships:

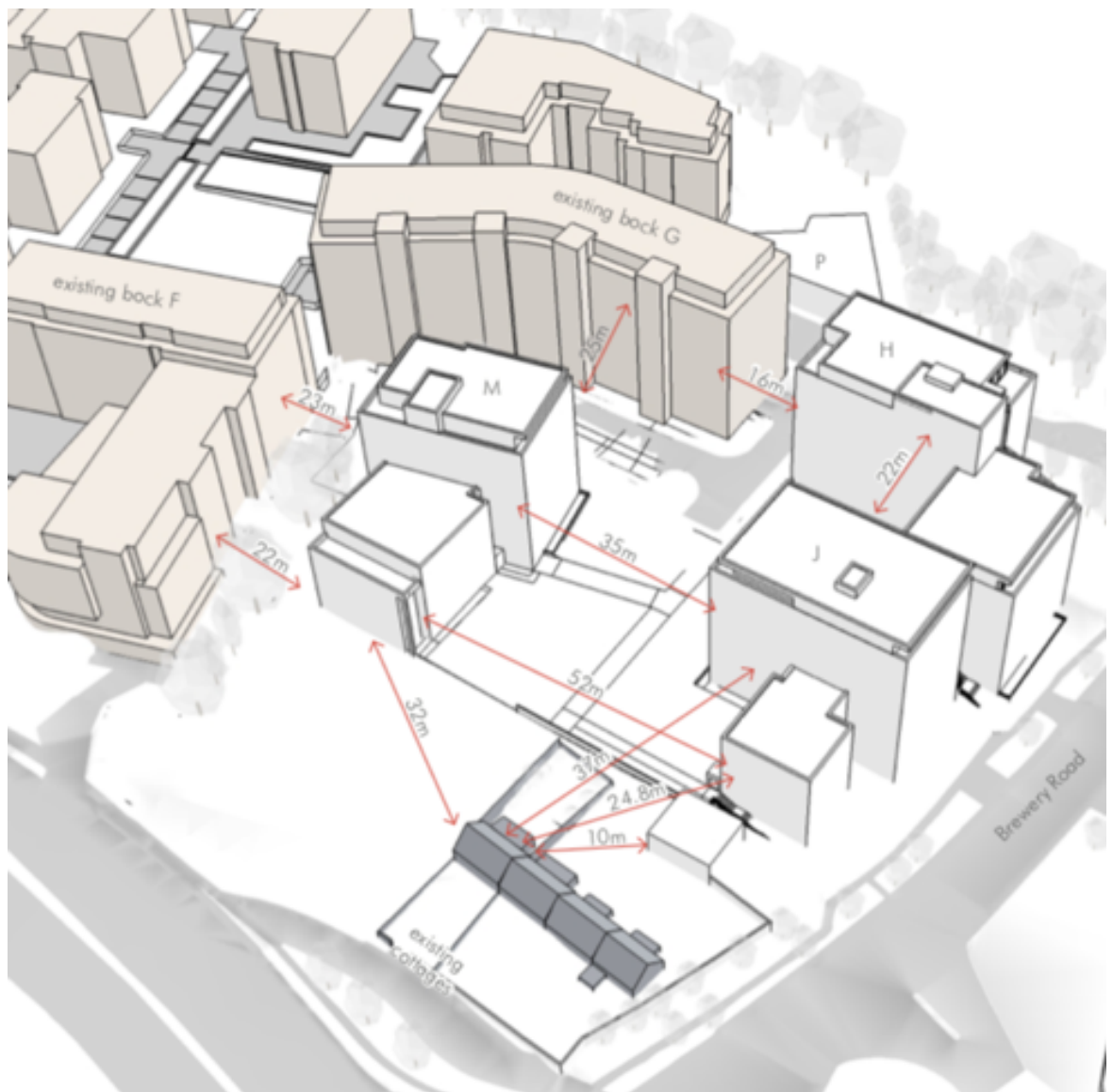


Figure 10 - Separation Distances to the Existing Grange Development

We can confirm that there are no instances of direct overlooking which have a separation distance of less than 22m within the development.

Notably, Proposed Block M is removed from Existing Block F by 23.5m. Generous planting is delivered between the blocks for screening at lower levels. Apart from 2 balconies at the higher levels, proposed balconies are not directly opposite existing balconies. The images below outline this relationship:

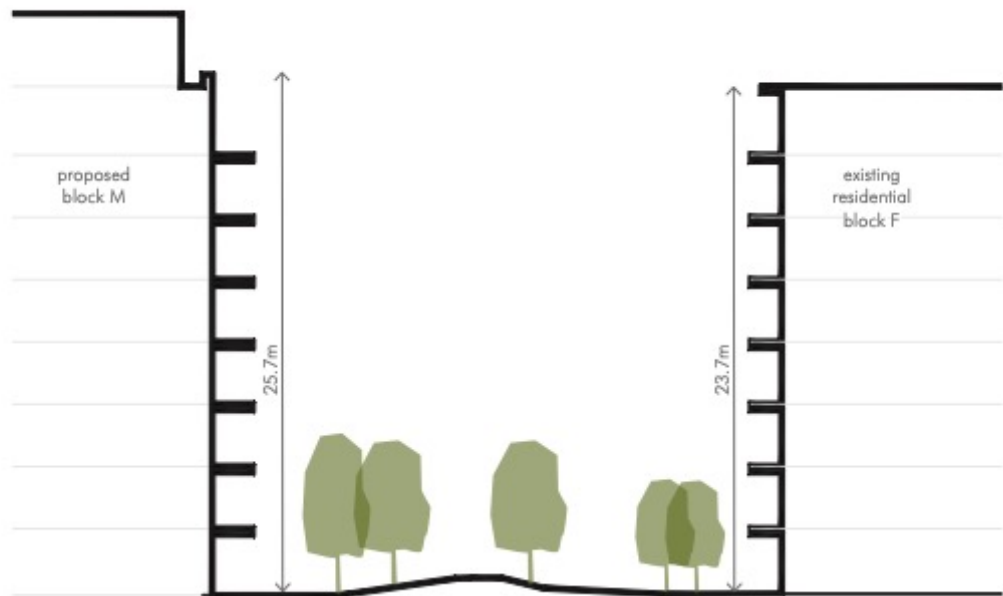


Figure 11 - Relationship between Proposed Block M and Existing Block F

Proposed Block M is removed from Existing Block G by 24.7-24.8m. Again, generous planting is delivered between the blocks for additional screening at lower levels. Block M is located to the north east of Block G and as such will have a minimum impact on sunlight and daylight levels of the existing block. No living room window within Block G is directly opposite Block M. This relationship is set out below:



Figure 12 - Relationship between Proposed Block M and Existing Block G

Block H is removed from Existing Block G by 16m, however there are no instances of direct overlooking proposed at this location. The blocks have been carefully positioned to protect the privacy of existing residents within the Grange and minimize impacts of sunlight and daylight.

Block H has been designed so the main living room windows (in orange) face away from the existing block G, apart from a single frosted glass window (in blue) to maintain privacy. Separation distance of at least 16m (17.9m in front of existing balcony window) as shown below:



Figure 13 - Relationship between Proposed Block H and Existing Block G

Overall Comment on Overlooking

The apartment blocks are organised around a central garden (H, J, M), and alongside an existing open space (N) H, J and M's orientation is strictly 45 degrees, meaning no apartment is north facing, and the central communal garden benefits from good sunlight penetration all year round.

Main living room windows are positioned to face away from each other, or be at least 22m apart (1bed apartments of H and J overlooking the courtyard). When blocks M and J both look towards the communal garden and each other, they are 35m apart.

Overshadowing

The following points from the Daylight and Sunlight Analysis report prepared by ARC are considered important in terms of impact vis a vis overshadowing and should be duly noted as a response to the matter of residential amenity and overshadowing:

Sunlight access outside the Application Site

“Having regard to the shape, layout and orientation of the application site and to the location of the proposed development relative to nearby existing development, the potential of the proposed development to result in material overshadowing of lands outside the application site is limited. (page 3)”

Sunlight Access for existing buildings outside the application site

“ARC ’ s analysis further predicts that the potential impact of shadows cast by the proposed development on the other studied windows is likely to range from “imperceptible ” to “slight ” . ARC ’ s analysis predicts that the potential impact of shadows cast by the proposed development on these windows is unlikely to be of a level, which would suggest that sunlight of an existing building “may be adversely affected ” (i.e. the three criteria for an adverse impact set out in the BRE Guide were not met in the case of the relevant sample windows studied as part of this analysis). Most sample windows are predicted to remain capable of receiving a level of sunlight access in excess of the annual level recommended by the British Standard and BRE Guide for rooms with a reasonable expectation of sunlight of 25% Annual Probable Sunlight Hours (including 5% Annual Probable Sunlight Hours during the winter period) after the construction of the proposed development (page 5)”

Sunlight Analysis of gardens and amenity areas outside of the application site

“Given that the neighbouring gardens will remain capable of achieving a level of sunlight very considerably in excess of that recommended by the BRE Guide after the construction of the proposed development, ARC’s analysis indicates that the proposed development will not result in any undue adverse impacts on sunlight access to neighbouring gardens throughout the year within the meaning of the BRE Guide. (page 6)”

Sunlight Access on within the proposed communal open space

“...The proposed central garden will receive a level of sunlight very considerably in excess of the level recommended by the BRE Guide for amenity spaces. The proposed communal open space will, therefore, appear adequately sunlit throughout the year within the meaning of the BRE Guide. More than this, the proposed communal open space will receive sunlight access throughout the day for most of the year (page 7).”

Daylight Access to Existing Buildings outside the application site

“...ARC ’ s analysis further indicated that the potential for noticeable impacts on daylight access at Grange Cottages and within The Grange was restricted to a small proportion of rooms and that affected rooms would retain the potential continue to achieve a level of daylight access (measured in Average Daylight Factor) in excess of the relevant minima recommended by British Standard after the construction of the proposed development. Under a worst case scenario, the potential impact of the proposed development on daylight access within Grange Cottages and The Grange is likely to be consistent with emerging trends for development in the area. Given this, ARC ’ s analysis indicates that the potential impact of the proposed development on daylight access within Grange Cottages and within the existing development was likely to range from none² to “imperceptible ” to “moderate ” .

ARC ’ s analysis further indicates that the construction of the proposed development is unlikely to result in a noticeable change in daylight access to neighbouring existing buildings at Lawnswood Park and the potential impact is, therefore, likely to range from none to “imperceptible ” to “slight ” .

Given that the potential for development to result in impacts on daylight access diminishes with distance, it is the finding of ARC ’ s analysis the proposed development does not have the potential to result in any undue adverse impact on daylight access within buildings in the wider area surrounding the application site (page 7)”.

Daylight Access within the Proposed Development

“ARC ’ s analysis indicated that all sample study rooms within the proposed development are likely to achieve levels of daylight access in excess of the minimum levels recommended by the British Standard for achieving a predominantly daylit appearance (i.e. 2% Average Daylight Factor) and for living rooms (i.e. 1.5% Average Daylight Factor) or kitchens (i.e. 2% Average Daylight Factor) (page 10)”.

Overbearing

A distance of 24m has been kept between the existing Grange Cottage and the proposed development. Furthermore, separation distances to Lanwnswood Park vary between 44-69 m.

Separation distances have also been carefully articulated within the scheme itself to ensure all minimum distances are met or exceeded, and the privacy of private open space areas are protected. Living rooms windows are at a minimum of 22m from each other.

Units are oriented to prevent overlooking between neighbouring blocks within and between the proposed and existing developments.

Noise

Chapter 9 of the EIAR submitted with this application contains a detailed and comprehensive assessment of the impact of the proposal from a noise and vibration perspective.

The following key findings from the chapter is set out as a response piece with regard to noise:

Once the development is operational, the potential noise impacts to the surrounding environment are minimal. The residential aspect of the development is not expected to generate any significant noise sources over and above those which form part of the existing environment at neighbouring residential areas (road traffic noise, estate vehicle movements, children playing etc.) and hence no significant impact are expected from this area of the development site (page 15).

Wind Impact Mitigation

With regard to wind impact mitigation measures, the input from BFluid has established the following:

- The proposed Grange Development will produce a high quality environment that is attractive and comfortable for pedestrians of all categories.
- The surrounding environment, development and mitigation trees properly shields all paths/walkways around and within the development. Pedestrian footpaths are always successfully shielded and comfortable.
- The development Courtyard is generally suitable for long term sitting, short term sitting, standing, walking and strolling activities.
- Shielding conditions in the South-West, South-East, North-East and North-West areas are always acceptable.
- Balconies within the development are comfortable for pedestrian sitting, standing, walking and strolling.
- The proposed development does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings.
- Pedestrian comfort assessment, performed according to the Lawson criteria, identified the areas that are suitable for different pedestrian activities in order to guarantee pedestrian comfort. In terms of distress, no critical conditions were found for "Frail persons or cyclists" in the surrounding of the development. No critical conditions have been found for members of the "General Public".
- During Grange Development construction phase the predicted impacts are classified as negligible.

Please note that not all trees and shrub planting were modelled in the above analysis. The trees alignments along Brewery Road, the main landscaping spine and along the North East boundary of the site were omitted from the study. As a result, we can expect microclimate and wind conditions to be even more comfortable than established above.

4.3 Item 3

A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable and available for all. Details relating to the materiality of the proposed interface between the proposed development and adjoining lands should also be submitted. Additional cross sections, CGIs and visualisations should be included in this regard.

A detailed landscape masterplan has been prepared and submitted by Mitchell & Associates and a formal response has been prepared by OMP Architects on this item. The following summary of points are identified:

The Design Concept

Landscape quality is an essential part of Kennedy Wilson's projects, and helps to create a strong sense of place. The proposal at the Grange has been a landscape led project from the outset of the design. Mitchell & Associates have created a quality design structured around permeability, both to Brewery Road, the

existing development and adjoining park. New central gardens and courtyards will act as the heart of the new development.

Brewery Road will receive a soft treatment of layered planting. An existing copses of trees will be kept by the new front door on Brewery Road, used as a central piece the entrance area.

New extensive high quality tree planting is proposed, in keeping with the current sylvan character of parts of the site.

The following amenity plan is set out from a landscaping perspective:

Layout and Materials

A playful and soft / green landscape completing the existing Grange Development.

Lush planting and formal hedge structures give definition to a bold textural planting palette creating a soft but distinct separation between the public internal street and the residential buildings and their private and semi-private spaces.

The hard landscape and planting palette will be appropriately coordinated with paving bands to create a designed continuity throughout the development. This paving strategy is also provided to enhance wayfinding within the scheme.

Extensive tree planting will seek to recapture the existing sylvan setting of some of the areas of the site, as well as provide screening and buffer between the proposed development and surrounding areas.



Figure 14 - Hard and Soft Landscaping

Accessibility

The 'Design Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion' prepared by OMP has set out clear improvements of the scheme from pre-planning stage to the current planning application stage. Key improvements include:

The connection from the N11 to the existing public open space has been redesigned. The scheme has been reconfigured to reduce the level of the central open space by c. 2m to improve accessibility to and through this area. There is also level access from the adjacent Leopardstown Oak Park to the N11.

The connection from Brewery Road to the existing central garden has also been reconfigured. Again, the level of the open space area has been dropped by 2m. There is a single level change on Brewery Road (4m). The ground levels of open space match those of key interfaces i.e. The Grange Cottages and Block G entrances. There is enhanced connection (lift and ramps) to the existing open space area. Lastly, the existing path to the south of the site has level access to the existing central open space.

The connection to the exiting Grange Central Garden has also been the subject of revised design proposals. The existing fire tender access route outside Block G (Jade) has been upgraded and is incorporated into the new landscape setting. The character of this space has been revised from hard to soft treatment to enhance the connection to the existing open space area. Significant soft landscaping proposals have been included in the design. An existing retaining wall is removed and ground levels dropped to improve connectivity. Enhanced connection (lift, steps and ramps) to the existing garden are included to improve universal access. Lastly, the existing steps are widened to enhance the visual connection between the developments.

Connections to existing areas of open space have also been considered as part of the design. Most notably, proposals are delivered within the red line boundary for a connection to Leopardstown Oaks Park.

4.4 Item 4

A detailed phasing plan for the proposed development.

Phase 1

We confirm that the current proposed phase 1 development is to be constructed in a single phase.

Phase 2

The 'Design Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion' prepared by OMP has set out indicative details on the potential for a future phase 2 development. A masterplan approach has been taken and the design is integrated in this regard. The form of the proposed development allows for a logical and seamless approach to development should the lands in question become available for development. It is envisioned that a potential future Phase 2 development would comprise c. 200 units and would complete the frontage along the N11 and Brewery Road with the potential for a landmark building at the junction of Brewery Road and the N11.

4.5 Item 5

Additional Details in relation to surface water management for the site, having regard to the requirements of the Drainage Division as indicated in Appendix B of the Planning Authority's opinion. Any surface water management proposed should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk.

The detailed response to this request is set out in the submitted material by Waterman Moylan, Consulting Engineers. Specifically, they have addressed all items identified on the drainage division report submitted at pre-planning stage. We note the main points as follows:

Qbar

Comments: The Qbar calculation has not been based on the supporting site investigation report included in the application. Based on the information provided, the calculation of Qbar, as prepared by municipal Services, for the site would suggest a higher outflow than what is being proposed within the application. It is noted the applicant has proposed a conservative value of Qbar, at 4l/s for the site, which is acceptable by Municipal services.

Response: The Qbar calculation has been revised to 6.36l/s to reflect the actual ground conditions on site in agreement with Johanne Codd of DLRCC.

Contributing Areas

Comments: The applicant has proposed two separate attenuation tanks and flow control devices for the site. The applicant is requested to clarify the area of each catchment and the impermeable area associated with each of these areas, to ensure the sizing of the attenuation tanks is appropriate. The applicant is requested to clarify if areas that are outside the red line boundary, but seem to fall to features within the proposed development (access road either side of the existing Jade building appears to be draining to the swale and permeable paving) have been included in the area of contributing hardstanding.

Response: The contributing areas to each attenuation tank are outlined on Waterman Moylan Drawing P208. There is a total area of 6000m² of hard standing discharging to the attenuation tank in the basement and 3790m² of hard standing discharging to a series of SUDS features before discharging to a final attenuation tank on front of Block N. The drainage contributing areas are shown on Waterman Moylan Drawing 18-093- P208.

Attenuation Tanks

Comments: The applicant has proposed concrete tanks for both attenuation systems. while it is acknowledged, particularly for the system under the J/H, that there will be rock issues, the applicant is requested to explore the possibility of modular or crated system for the second attenuation system to Block N.

Response: Both proposed attenuation tanks are concrete. The possibility of using a crate attenuation system was explored however, during the groundwater monitoring on site, the highest water level was measured as 1.25m below ground level. Therefore, the proposed attenuation system must prevent the ingress of ground water into the tank.

Swale design

Comments: The proposed provision of swales throughout the site is noted and welcomed. A number of the swales (No 5 and No 6) appear outside the red line boundary. The applicant should clarify the detail at this location. The applicant is required to submit supporting standard details, including cross-sections and long-sections, and commentary that demonstrates that the swale has been designed in accordance with the recommendations of CIRCA C753 (The SuDs manual). Where runoff is directed into the swale by pipe or gully, the risk of erosion and silting is increased. The applicant shall provide flow spreaders and erosion controls where appropriate to mitigate the issue. In addition, there appears to be a slight discrepancy in the engineering and landscape drawings, whereby the swale has been labelled by a variety of names on the landscape drawings (section drawings) such as bioretention area, bioretention/swale, and bioretention feature. While similar, the design/vegetation to be included differ slightly. The applicant is requested to be consistent in the naming of the SuDs feature.

Response: As a result of the redesign, Swale 5 and 6 are no longer required. Details of the proposed swales are included in Waterman Moylan Drawing 18-093-P210. Where run-off is directed to a swale by pipe or gully flow spreaders will be used to prevent erosion.

Connection to EXSW34

Comments: At manhole EXSW34, on the existing surface water network on Brewery Road, there appears to be a connection coming from either a swale or the foul drain shown going to directly to this external network. This should be removed.

Response: The pipe shown is an existing branch into the existing manhole. The branch pipe has been removed from the proposed drainage drawings to avoid confusion.

Tree location

Comments: The applicant should be requested to remove trees from the vicinity of attenuation system outside Block N. As standard, the applicant shall ensure that other disciplines' drawings, including landscape drawings, are compatible with engineering drawings.

Response: The Trees along the access road to the immediate north of Block N will have a root barrier to prevent ingress of roots into the attenuation system. The trees previously located between block N and the attenuation tank have been removed from the landscape plan.

Green Roofs

Comments: The applicant appears to have demonstrated by calculation and by representation on a drawing that the proposed green roof extents are in accordance with the councils Green Roof Policy such that the minimum coverage requirement of 60% is achieved. The applicant shall provide details of maintenance access to the green roofs and should note, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangement such as external mobile access that will be centrally managed. A detailed cross section of the proposed build-up of the green roof should be provided, including dimensions.

Response: As demonstrated in section 4.4 of the Engineering Assessment Report prepared by Waterman Moylan, 70% of the proposed roof area is Green Roof. The maintenance and access strategy is outlined in the Building Life Cycle Report by Aramark which accompanies this application. In addition, a cross section of the proposed Green Roof build-up is provided on Waterman Moylan Drawing 18-093- P207.

Interception Storage

Comments: The applicant has provided a drawing and text detailing the interception proposals for the site. As noted above, clarification on areas outside the red line should be provided. From the information provided, it appears the applicant has demonstrated compliance with GSDS requirements.

Response: The interception storage provided is outlined in section 4.6 of the accompanying Engineering Assessment Report. Areas outside the red line boundary will not generally benefit from interception storage.

SUDS

Comments: As standard, given that the applicant is proposing SuDs measures that incorporate the use of infiltration, the applicant should provide details of each SuDs measure and confirm whether it will be lined/tanked or not. If lined/tanked systems are to be used, then the applicant will be requested to explain the rationale behind this.

Response: All SUDS will be lined at the base as during the groundwater monitoring on site, the highest water level was measured as 1.25m below ground level. In line with the SUDS Manual, drainage systems dependant on infiltration techniques must not be installed within 1m of the water table.

Attenuation Tanks

Comments: *As standard, the applicant is required to provide fully dimensioned plans and sections of the storage system. All relevant inlet and outlet levels, dimensioned clearances between other utilities, and actual depths of cover to the system shall be provided. Within the concrete tanks, a central channel should be provided to aid in the maintenance of the system.*

Response: Fully dimensioned plans and sections of the attenuation tanks are included on Waterman Moylan Drawing 18-093 P211. The screed is laid to falls within the base of the concrete attenuation tank and a central channel will be provided to aid cleaning as indicated on drawing 18-093- P211.

Permeable Paving

Comments: *As standard, the applicant is required to submit supporting standard details, including cross-sections and long – sections, and commentary that demonstrates that all proposed permeable paving has been designed in accordance with the recommendations of CIRCA C753 (The SuDs Manual)*

Response: The permeable paving is designed in accordance with the SUDS Manual and the requested details are provided on Waterman Moylan Drawing 18-093 - P206.

Separation Distances

Comments: *As standard, the applicant is requested to demonstrate on a drawing that all infiltration SuDs proposals, including the attenuation systems, have a 5m separation distance from the building foundations and 3m separation from the site boundaries.*

Response: As the proposed SUDS features, including the attenuation tanks are lined features there will be no percolation into the ground and therefore it is not necessary to keep the SUDS features more than 5m from foundations or 3m from the site boundary.

Service Cross Sections

Comments: *As standard, the applicant is required to provide cross sections detailing all utilities and showing vertical and horizontal separation distances to be provided at critical locations. Minimum separation distances shall be in accordance with applicable Codes of Practice.*

Response: The typical service cross-sections are included on Waterman Moylan Drawing 18-093- P233. Minimum separation distances will be in line with the relevant codes of practice.

Coordination

Comments: *As Standard, the applicant shall ensure that other disciplines' drawings, including landscape drawings and architecture, are compatible with engineering drawings. (It is noted the swales have not been shown on the O'Mahony Pike Level 02 Plans, as it is technically outside the red line area.*

Response: Drawings have been coordinated with all other disciplines for this application.

Storm Water Audit.

Comments: *As Standard, a stormwater Audit will be required for this application. In accordance with the stormwater audit policy, the audit shall be forwarded to the DLRCC prior to lodging the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.*

Response: A storm Water audit has been carried out by Punch. The Storm Water Audit was sent to Johanne Codd of DLRCC prior to submission and also forms part of this submission.

4.6 Item 6

Additional details and justification for the proposed development in relation to roads, access and circulation, having regard to the report of the Transportation Division of the Planning Authority, as detailed in Appendix B of their Opinion.

The detailed response to this request is set out in the submitted material by Waterman Moylan, Consulting Engineers. Specifically, they have addressed all items identified on the transportation division report submitted at pre-planning stage. We note the main points of response as follows:

Access

Comments: *Consideration of likelihood for any potential/need for future signalisation and linkage of this junction to the N11 may be worthwhile.*

Response: The need for future signalisation was considered and the junction of Brewery Road and the Site access. In order to assess the performance of this junction it was modelled in the Transport Assessment prepared by Waterman Moylan. It was found that the junction operates well within capacity up to and including the design year of 2038 and therefore signalisation is not required at this stage.

Comments: *A Quality Audit is recommended.*

Response: A Quality Audit has been prepared as part of the Road Safety Audit which is included with the application.

Comments: *Availability of continuous accessible routes for all users to be demonstrated.*

Response: The DMURS statement prepared by Waterman Moylan demonstrated the availability of continuous assessible routes for all users of the development. The proposed development has been carefully designed to promote strong levels of connectivity in favor of pedestrians and cyclists with vehicular movement taking a secondary role in line with the objectives of DMURS. Connectivity throughout the scheme is heavily weighted towards the pedestrian with only 1 car park access points to the basement car parks. There are no other roads proposed on site with all other areas fully pedestrianised.

The development provides links from the existing Grange Development through the subject site to improve accessibility. It also provides pedestrian links to the adjacent public park.

Car Parking

Comments: *The proposed level of reduction to 0.5 per unit is not deemed acceptable and not in line with car ownership and therefore does not provide for adequate car parking/ car storage for the proposed residential use.*

Response: A detailed carparking strategy is outlines in the "Car Parking Statement" submitted as part of this application. The proposed development is ideally suited to facilitate significantly reduced parking from the normal requirements as set out in the Dun Laoghaire Rathdown County Council Development Plan. The applicant is confident that the proposed development can support the proposed reduced parking in line with the New Apartment Guidelines for the following reasons:

- The proposed development is a Build to Rent Scheme operated by Kennedy Wilson.
- Kennedy Wilson currently operate approximately 2400 units in Ireland and have successfully reduced parking demand to 0.32/unit.
- The proposed development is well located in proximity to high quality public transport; less than 5 minutes walking of a QBC with services direct to the City Centre and less than 15min walk to Sandyford Luas.
- The proposed development is well located within 15min walk and 5min cycle to Sandyford Business Park, a Major Employment Centre.
- The proposed development is well located within 15min walk and 5min cycle to excellent amenities and services in Stillorgan Village.

- There is excellent cycle infrastructure in the area with dedicated cycle lanes along the N11 Stillorgan Road and N31 Brewery Road.
- The proposed development will provide 596 No. cycle parking spaces, including secure and safe cycle parking.
- Nearby census data suggests that green modes of transit are more popular for commuting among local apartment residents than private cars, which highlights the accessibility to good quality Public Transport.
- The proposed development will provide 5 No. Car Club/Car Sharing spaces which will provide residents with access to a car when they need one.
- Kennedy Wilson control 275 car parking spaces in the adjoining Phase 1 development where they currently have 100 vacant/unused spaces. If you consider the existing vacant/unused spaces together with the proposed spaces (100+84), then the parking ratio would increase to 0.66/unit. Even if you assume that only 50% of the vacant spaces are available the ratio would equate to 0.5/unit.

Cycle Parking

Comments: Dimensioned clearly indicated details of all proposed cycle access routes and access to and from cycle parking are recommended.

In addition, *The Applicant is requested to provide details of the proposed operation and management of the development car parking and cycle parking facilities.*

Response: Dimensioned drawings of the proposed cycle parking arrangement are set out in the accompanying architects' drawings. The operation of the cycle parking is set out in the Transport Assessment and the operation of the car parking is set out in the Car Parking Strategy report.

Temporary Parking and Loading Bays

Comments: designated surface level visitor/drop off/collection and load/unloading parking spaces for the residential development are recommended.

Response: Visitor spaces are provided at surface level to the north of the access road. A total of 8 spaces are provided, 5 of which will be used for Go-Car car sharing, There are also 2 spaces provided for large deliveries to the east of block H and one space for smaller van/car deliveries or drop-off/collection in the layby to the south of Block H.

Entrance from Brewery Road

Comments: vehicle manoeuvres required for refuse collection, emergency vehicles and delivery, collection

Response: The stop sign is provided at the back of the footpath as shown on the accompanying Waterman Moylan drawings. Dropped kerbs and tactile paving is provided across the vehicular access to allow pedestrians to cross.

Vehicle Swept Path Analysis

Comments: vehicle manoeuvres required for refuse collection, emergency vehicles and delivery, collection

Response: Refuse collection will be provided from the same location as the existing refuse collection point from The Grange off the N11 Stillorgan Road. Vehicle Swept Path Analysis drawings for emergency vehicles have been provided as part of the accompanying planning pack. These drawings demonstrate that there is sufficient space for vehicles to carry out the required movements.

Carpark Layout

Comments: *The Applicant is requested to ensure that the proposed basement car park and access it in accordance with Section 8.2.4.10 of DLRCC Development Plan 2016-2022 and complies with requirements of the*

Institution of Structural Engineers booklet entitled 'Design Recommendations for Multi Storey and Underground Car Park Fourth Edition'.

Response: The carpark has been designed in accordance with the requirements of the Institution of Structural Engineers booklet 'Design Recommendations for Multi Storey Underground Car Parks' Fourth Edition. We would note however that the

Electric Vehicle Charging Points

Comments: proposed development car parking spaces are constructed so as to be capable of accommodating future electric charging points for electrically operated vehicles. A minimum of one car parking space per ten residential units shall have a functional Electric Vehicle Charging Point

Response: In line with DL RCC County Development plan a minimum of 1 EV charge point per 10 residential units will be provided. Therefore, a minimum of 28 EV charging points will be provided. The remainder of the spaces will be capable of accommodating EV charge points in the future.

Travel Plan

Comments: The Applicant is requested to submit a Travel Plan for the proposed residential development in accordance with Section 8.2.4.3 of CDP 2016-2022. Prior to first occupation of the residential units a Travel Plan Manager (Mobility Manager) shall be appointed to implement, monitor and review the plan. The Planning Authority shall be advised of contact details for the appointed Travel Plan Manager.

Response: A Mobility Management Plan has been prepared for the development and forms part of the Car Parking Strategy document. A management company will be appointed by the developer to manage the development. A senior member of staff from the management company who supports the philosophy of the Plan will be appointed as the Co-ordinator. The Co-ordinator should be appointed prior to first occupation of the Site. Contact details for the person responsible will be made available to the Planning Authority once appointed.

Construction Management Plan

Comments:

- a) Traffic management plan including Construction vehicular access to site in particular to avoid conflict between construction activities and pedestrian/cycle/vehicle traffic on Brewery Road and the local road network.
- b) How it will be intended to avoid conflict between construction activities and pedestrian movements during construction works
- c) Where it is intended to provide for site staff car parking during construction in that is not acceptable to have long term parking in the nearby residential areas.
- d) Proposed measures to minimise /eliminate nuisance caused by noise and dust, proposed working hours and measures to minimise/prevent transfer of dirt to the public road with associated measures to clean the public roads/gully's etc. in the vicinity of the site and continuing replacement of roads line markings resulting therefrom.

Response: The construction vehicle access to the site will be provided from the N31 Brewery Road. Details of the construction access are provided in the Construction Management Plan prepared by Strata on behalf of Lafferty Project Management. A banksman will be provided to avoid conflict between construction traffic and other road users. Access for pedestrians and vehicles, including fire tender access to the existing Grange development will be provided via the existing site access for the duration of the works.

A small amount of parking will be available on site. These will be managed by the contractor to ensure the fire tender access to the main "The Grange" development remains clear at all times. The site is well served by public transport including Dublin Bus and Aircoach bus, as well as the LUAS Sandyford stop approximately 1.1km from the site.

There are a number of measures proposed in the accompanying Construction Management Plan to minimise nuisance caused by noise and dust which the contractor will be expected to abide by and add through as appropriate throughout the development.

Typical working hours for the site would be 08.00 to 19.00 Monday to Friday and 08.00 to 14.00 Saturday. No Sunday work will generally be permitted.

On-site wheel wash and road sweepers will be employed as necessary to clean public roads. Should debris enter the road drainage this will also be cleared by the contractor to prevent blockages from occurring.

Should any road line markings need replacement as a result of the construction works these will also be replaced by the contractor.

4.7 Item 7

An Ecological Survey of existing trees and hedgerows, which clearly identifies all trees/hedgerows proposed for removal.

We refer An Bord Pleanála to the Environmental Impact Assessment enclosed herewith, which clearly sets out ecological survey detail of the site, existing trees and hedgerows. Consideration has been given to trees for removal in this input. Impact Assessment and relevant mitigation measures are set out.

4.8 Item 8

Waste Management Details

A Construction and Demolition Waste Management Plan and an Operational Waste Management Plan has been prepared by AWN for the proposed development. We note the following conclusions from the Operational Waste Management Plan:

“This OWMP provides a strategy for segregation (at source), storage and collection of all wastes generated within the building during the operational phase including dry mixed recyclables, organic waste, mixed non-recyclable waste and glass as well as providing a strategy for management of waste batteries, WEEE, printer/toner cartridges, chemicals, textiles, waste cooking oil and furniture.

Residential waste will be conveyed by occupants to a dedicated communal waste storage area on Level 01. The bins/FIBCs of segregated waste/recyclables will be conveyed by the building management company or waste contractor to the designated collection point for collection/emptying by the nominated waste contractor(s). Once emptied, bins should be promptly returned to the WSA.

The crèche tenant will be responsible for conveying their own bins to the front of their unit emptying by the nominated waste contractors. They will be positioned such that they don't obstruct pedestrian traffic on the footpath. Once emptied, bins should be promptly returned to internal WSA.

In summary, this OWMP presents a waste strategy that complies with all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the development.

Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus achieving the targets set out in the EMR Waste Management Plan 2015 – 2021 and the DLR Refuse and Recycling Storage Guidelines. (page 19)”

In terms of waste management operations and bin storage locations, we reference page 54 of the enclosed 'Design Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion', which confirms the following arrangements for waste management at Level 00 and Level 01 within the scheme.



Figure 15 - Waste Management at Level 00



Figure 16 - Waste Management at Level 01

Proposals at Level 00 generally consist of:

- Main bin store located at Level 0 close to Blocks H and J cores.
- Waste collection is located off the N11 beside office building F – a forklift will travel to basement along the path to collect compacted bales.
- All waste collection, including for the existing development, will be off the N11 collection point.

Proposals at Level 01 generally consist of:

- Additional satellite bin stores in Block N at level 01 and P at level 02 (respective entrance levels for both blocks). Waste will be collected by management and brought to the main bin store.

The location of the bin collection point, satellite bin stores and travel routes, are identified in Figures 1 and 2 above.

4.9 Item 9

A lifecycle report shall be submitted in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018). This report should specifically address proposed materials, finishes and detailing which seek to create a distinctive character for the development, avoiding blank facades, dead frontage and render and which provides for active frontages and corners. The documents should also have regard to the long term management and maintenance of the proposed development.

We refer the Bord to the enclosed Building Lifecycle Report prepared by Aramark, which addresses proposed materials, finishes and sets out the distinctive character for the development, which avoids blank facades, dead frontage and render and which provides for active frontages and corners.

The following response is identified for Item 9 of the ABP Opinion within the Aramark Lifecycle Report:

“Aramark Property are of the opinion that building materials, finishes and detailing proposed for block elevations and in the public, semi-public and private realm achieve a durable standard of quality that will not need regular fabric replacement or maintenance outside general day to day care.

The choice of high quality, robust and long-lasting materials such as brick, metal and stone cladding as the predominant façade materials, with contrasting render finishes to smaller and more private areas of the façades has been appropriately specified, and will contribute to lower maintenance costs for future residents and occupiers.”

The Building Lifecycle enclosed also refers to the long term management and maintenance of the proposed development as required.

We also refer An Bord Pleanála to the Response to An Bord Pleanála’s Notice of Pre-Application Consultation Opinion prepared by OMP Architects, which details a clear response to facade treatment on pages 55-57. Articulation and Materiality is the focus of this document and the following key points from the OMP document in this regard:

Articulation

A nuanced approach is proposed for the facade treatments:

- The buildings are designed as a series of pavilions of varying height, with the breaks in volume indicating points of entry.
- Massing is simple and legible with the buildings’ base grounded in the landscaping and the series of steps, lifts and ramps that negotiate the level difference between Brewery Road and the internal landscape beyond.

Lands adjacent to 'The Grange', Brewery Road/Stillorgan Road, Stillorgan, Blackrock, Co. Dublin: Opinion Response

- Lower levels windows are paired with level 1 windows on some of the blocks, creating a subtle double height plinth that plays on sense of scale.
- In block H, the concierge and residential area on the realigned access road is double height, with the block visually lifted on columns to create a welcoming sheltered space underneath.
- Balconies at high levels are turned around the corner of the blocks, addressing the city at higher heights and adding interest.
- On Brewery Road, balconies are gathered in frames of varying height that add interest and modulation, and act as buffer for the apartments.
- Penthouse levels are designed with strong projecting canopies to animate the skyline.



Figure 17 - Blocks J, H and N on Brewery Road

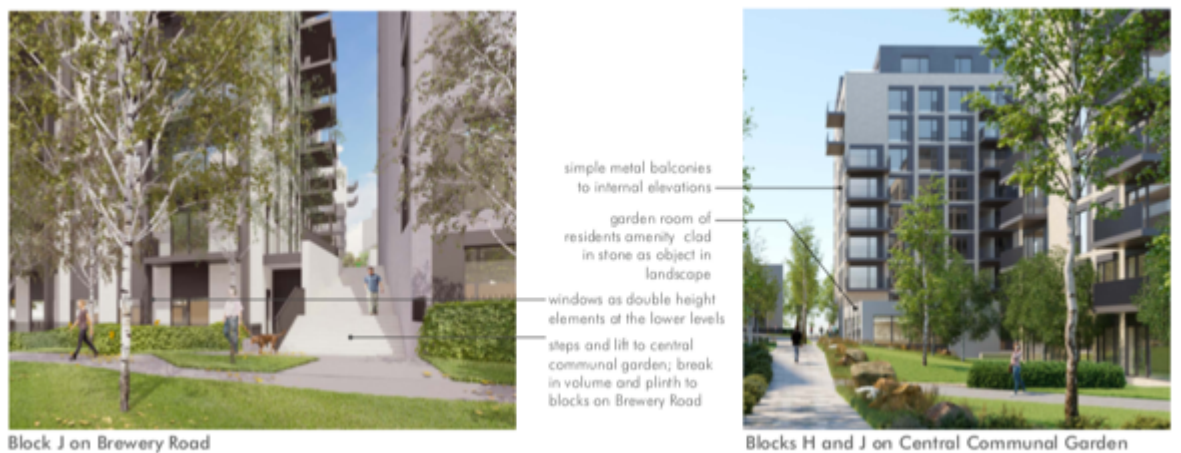


Figure 18 – Blocks H and J



Figure 19 - Block H

Materiality

- Brick cladding as a protective hard wearing shell on the tall blocks and along the main route into the scheme (in black below).
- Soft elevations - rendered facades - around the more private areas and small building elements (in blue below). This will provide contrasting texture and colour, adding variety and a more domestic scale to the smaller blocks.
- Soft contrasting penthouse levels in dark grey render add contrast and definition to the skyline.
- Windows and balconies are metal, with clean sharp lines contrasting with the rougher brick and warm render.
- Windows are detailed with a side panel of similar colour, which helps create a look of openness and lightness for the facade, with the brick or render appearing as a lattice between the perceived openings.
- The ground floor of block H, which hosts the concierge and resident's amenities will be clad in stone along the realigned access road and the pedestrian spine, to denote its special nature and add interest.
- Where roofs are not intended for private use, green roofs are proposed throughout.

The images below set out proposal in this regard:



Brick cladding and generous windows

Figure 20 - Materials



Grey render as a contrasting material

Stone cladding to the residents' amenities

Figure 21 - Materials

4.10 Item 10

A schedule of floor areas for all proposed units.

We refer the Bord to the enclosed schedule by OMP Architects.

4.11 Item 11

Site Specific Construction and Demolition Waste Management Plan

A Construction & Demolition Waste Management Plan for the development has been prepared by AWN and is enclosed herewith for review by An Bord Pleanala.

4.12 Item 12

Information referred to in Article 299 B (1) (b) (ii) (II) and article 299 B (1) (c) of the Planning and Development Regulations 2001-2018, submitted as a standalone document.

Notwithstanding the fact that the application is subthreshold, the applicant has elected to prepare an EIAR which is enclosed herewith.

5 CONCLUSION

We trust that the above report and enclosed documentation positively addresses the issues raised in An Bord Pleanála's Opinion.

The Design Team has finalised the scheme on the basis of feedback received through the consultation process and we submit that the final proposal now submitted is reflective of all comments received.