

# STRATEGIC HOUSING DEVELOPMENT, BLACKWOOD SQUARE, NORTHWOOD AVENUE, SANTRY, DUBLIN 9

## Statement of Response



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Strategic Housing  
Development Santry  
F01  
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## STATEMENT OF RESPONSE

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### Approval for issue

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Helena Gavin

*Helena Gavin*

22 November 2019

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## 1 INTRODUCTION

This Statement of Response (Response) has been prepared by RPS Group Ltd. on behalf of Cosgrave Developments (the Applicant) to accompany an application for permission for a proposed Strategic Housing Development (SHD) consisting of 331 no. units on lands off Northwood Avenue, Santry, Dublin 9.

The formal Tripartite Preapplication Meeting between An Bord Pleanála, Fingal County Council and the Applicant was held on 2<sup>nd</sup> September 2019 to discuss the proposals. The notice of Pre-Application Consultation Opinion (**Appendix A**) issued by An Bord Pleanála dated 10<sup>th</sup> September 2019 concluded as follows:

*“An Bord Pleanála 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 consultations constitute a reasonable basis for an application for strategic housing development”.*

The Notification did not outline any concerns which should be addressed in order for the proposals to be considered a reasonable basis for an application for SHD; however, the Board did request that specific information should be submitted with any application for permission.

It is highlighted to the Board that points raised and discussed at the Tripartite Preapplication Meeting together with the points raised in the submission from Fingal County Council made under section 6(4)(b) and subsequent engagement and agreement with Fingal County Council have been incorporated into the planning application package.

Specific information requested as part of the Notification is submitted with the application. Below is a summary of this information and where the detail may be located within the planning application documentation.

### 1.1 SPECIFIC INFORMATION SUBMITTED

For convenience we will address each item in turn with the item highlighted in bold and the response set out thereafter. The response will refer to the documents and drawings submitted where more detailed and specific information is provided to the issues raised. An Bord Pleanála is referred to these enclosures in reviewing responses.

#### 1.1.1 Item 1

***A detailed landscaping plan integrating any relevant recommendations from Arborist Report, the surface water requirements and compliance with the appropriate provision of play facilities for all areas and delineation of all public, semi-private and private spaces and any areas which may be taken in charge in the future inter alia the public open space along the east of the site.***

The Applicant recognises that the quantity and quality of open space provided within a new residential development is a key element in ensuring a high level of residential amenity for future residents. This proposal seeks to deliver open space of the highest quality, with a variety of hard and soft landscaped areas in order to provide for both passive and active recreation. The open space within the proposed residential scheme provides a hierarchy of spaces comprising public, communal and private open spaces. Proposals are illustrated on the landscape drawings prepared by Kevin Fitzpatrick Landscape Architecture within the planning application package. These proposals have been developed and refined in close collaboration with the project arborist and project engineer.

As set out in the *Planning Report & Statement of Consistency* accompanying this application for permission, the proposed development has been designed to integrate existing features of the site into the

proposed development. The Applicant, has in residential development which has already taken place adjacent to the subject site, actively sought to ensure that the sylvan nature of the area is carried through into a well thought out site layout. A belt of trees exists along the eastern part of the site layout and consists of a number of species that are protected under a Tree Preservation Order

The character of the open spaces proposed comprise public parkland open space and public realm open space.

### **1.1.1.1 Public Parkland Open Space**

The public parkland open space is located to the east and south of the proposed apartment blocks and is indicated on drawing number PL03 prepared by McCrossan O'Rourke Manning Architects. This area (4,672sq.m) is predominantly characterised by mature trees forming a linear belt running north to south through the site. In this regard, it is noted that the proposed development is located within an area that is covered by the Tree Preservation (Santry Demesne) Order 1987. An *Arboricultural Report* prepared by The Tree File is included as part of this application package.

#### **Existing Trees**

The design process undertaken as part of this planning application process fully considered all trees from the outset and the need to retain them was a major factor determining the site layout. The *Arboricultural Report* indicates that the root systems related to these trees are contained to the east of the ditch running along the western side of the tree belt. This drainage ditch, which runs north to south through the site, historically acted as constraint to natural root development of the belt of trees and effectively prevented root growth across the ditch line in a westerly direction. This has meant that all element of works on the western side of the ditch are effectively inconsequential. As part of design development various elements of underground infrastructure originally indicated within the vicinity of the trees and their root systems have been relocated to ensure that existing trees are in no way compromised.

#### **Treatment of the Ditch**

Following discussion during the Tripartite Preapplication Meeting with respect to the drainage proposals and treatment of the ditch, it was noted that the function of the ditch as a drainage channel is no longer required due to development which has taken place on the overall site under Reg. Ref. F04A/1562. It was agreed however that the storage function of the ditch could be utilised through its infill with porous material and grassed over to become usable albeit slightly depressed feature of the landscaped setting over which pedestrian pathways and passive recreation can take place. The proposed landscape measures proposed are presented in drawing number 101 prepared by Kevin Fitzpatrick Landscape Architecture. The surface water drainage strategy for the site is provided in the *Water Services Report* and drawings prepared by JB Barry & Partners Consulting Engineers.

#### **Landscape Planting**

The landscape proposals will complement existing trees with planting of the same native broadleaf species. New planting of standard and heavy standard specimen trees will be planted throughout the area to visually integrate the development with the existing character and emerging setting. The proposals will guarantee the long-term retention of the existing tree group as a landscape amenity feature of significant amenity value.

#### **Separation Distance**

Following discussion with An Bord Pleanála and Fingal County Council at the Tripartite Preapplication Meeting it was agreed to further increase the separation distance between the drainage ditch and the footprint of the apartment block by 2m from what was originally proposed. This design change not only



increases the separation distance but also increasing the extent of the parkland area available to the overall site. The site layout is presented in drawing number PL02 prepared by McCrossan O'Rourke Manning Architects with the proposed landscape masterplan presented in drawing number 101 prepared by Kevin Fitzpatrick Landscape Architecture.

### Play Areas

Following the Tripartite Preapplication Meeting a review of play areas within the public parkland open space was undertaken. In this regard, and in compliance with the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*, 3 no. play spaces (175sq.m, 237sq.m, 238sq.m) have been located to the south east of the apartment buildings. Details of these spaces are illustrated on drawing number 101 prepared by Kevin Fitzpatrick Landscape Architecture. The play areas are located where they may be passively supervised from the concierge/management suite and pedestrians moving along north-south and east-west pedestrian pathways through the proposed development and which connect into the wider landscape and public open space strategy for the overall Northwood area. These connections are illustrated on drawing number PL02 prepared by McCrossan O'Rourke Manning Architects. It is also noted that the areas of active play will be suitability removed from factors which may influence their usability beneath mature trees and over root systems. The relocation of play facilities to this area and tree management was agreed during further engagement with Fingal County Council Parks Department following the Tripartite Preapplication Meeting.

### Proposed Works within the Vicinity of the Trees

All proposed works within the vicinity of the trees and their root systems will be implemented and managed through a unified works methodology incorporating procedures set out in the *Arboricultural Report* prepared by The Tree File. These measures are incorporated into the *Construction and Environmental Management Plan* (Draft CEMP) prepared by JB Barry & Partners Consulting Engineers. Recommendations set out in the *Arboricultural Report* are also incorporated into the *Landscape Report and Outline Landscape Specification* prepared by Kevin Fitzpatrick Landscape Architecture. A composite layout plan incorporating underground infrastructure, landscaping proposals and tree root protection areas is presented in drawing number 102 prepared by Kevin Fitzpatrick Landscape Architecture in conjunction with McCrossan O'Rourke Manning Architects, JB Barry & Partners Consulting Engineers, McElligott Consulting Engineers and assessed by the The Tree File.

#### 1.1.1.2 Public Realm Open Space

The site layout has been devised to respond to the urban design principles as set out in the *Sustainable Residential Density Guidelines for Planning Authorities* and seeks to provide a legible layout through the creation of a new public realm with a strong building line, active frontages and the varied use of materials, finishes and planting. The public realm open space (5,255sq.m) is located to the west and south of the proposed apartment blocks and is indicated on drawing number PL02 prepared by McCrossan O'Rourke Manning Architects.

This part of the site is devoted to the creation of a public realm which will provide a new street edge and also form part of a defined route through the subject site area enabling a direct connection between the existing and proposed residential development with the potential MetroLink station at the junction of Northwood Avenue and Ballymun Road.

The new north-south street is west facing with the space widening the closer it gets to the intersection with the east-west pedestrian route. The uses within the ground level units will all be capable of accommodating a mix of class 1, class 2, class 8, café/deli and restaurant uses. It is proposed that the first use within each of the units will be agreed with the planning authority prior to occupancy with the exempted development planning regulations commencing on all changes of uses thereafter. In this regard the landscaping proposals have been formulated with flexibility in mind to ensure that those areas capable of

optimising aspect and position will be provided with seating to facilitated passive leisure or spill out areas associated with any prospective café type use.

The landscape measures provide open space areas to a high specification at ground level. The landscaping strategy and public realm proposals have been developed with particular regard to the existing character of the site, the particular position of the space in respect of light availability and functionality of the space in order to ensure that the landscaping of the development is tailored specifically to the site. The landscape strategy will increase the quantity and diversity in the locale adhere to sound sustainable development principles. The suite of measures includes paving, civic and amenity lighting and appropriate planting.

The materials and planting specified in the scheme are also such as to minimise the amount of maintenance required which ensures a sustainable landscaping scheme. The maintenance of high quality landscaping will be ensured into the future by means of a management company. An *Owners Management Company Operational Management Plan* has been prepared by Wyse Property Consultants and is submitted as part of the application package.

### 1.1.1.3 Central Communal Courtyard

Semi-private open space is included as an integral part of the proposed development in the form of a communal landscaped area (3,196sq.m) at the centre of the proposed development and surrounded by the apartment buildings. This semi-private open space will be a high quality useable space which will be a genuine addition to the residential amenity for the future residents of the proposed scheme. This space will be accessible to the future residents of the proposed scheme only. In addition, private spaces (475sq.m) are provided external to the apartment blocks which act as defensible or buffer areas between ground floor residential units and public areas. These areas are illustrated on the architects and landscape architects drawings.

#### Area of Play

Within the communal courtyard it is proposed to locate an area of play intended for use by younger children. This area comprises approximately 152sq.m, which was agreed with Fingal County Council during the pre-application stage as being appropriate, and will be for the sole use of the residents of the development.

### 1.1.1.4 Management and Taking in Charge

The proposed apartment development will be located over a podium basement area. The open space on the podium will be privately managed and no private open space areas will be taken in charge by the Planning Authority. The maintenance of high quality landscaping will be ensured into the future by means of a management company. An *Owners Management Company Operational Management Plan* prepared by Wyse Property Consultants is included as part of the planning application documentation.

Public open spaces will also be privately managed however should taking in charge procedures occur in the future the landscape design ensures that a clear delineation of management can take place. These areas are illustrated on drawing number PL26 prepared by McCrossan O'Rourke Manning Architects.

## 1.1.2 Item 2

***Details of all materials proposed for buildings, open spaces, paved areas, boundary and retaining walls and a building life cycle report in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).***

Section 6.3 of the *Sustainable Urban Housing: Design Standards for New Apartments* relates to unit sizes, it is considered that the intention is to refer to Section 6.13 which relates to Lifecycle Reports. Section 6.13 states:

*“Accordingly, planning applications for apartment development shall include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce the costs for benefits of users”.*

The details of the materials proposed are included in the *Architect’s Design Statement* and the *Building Lifecycle Report* prepared by McCrossan O’Rourke Manning Architects submitted as part of the application documentation.

This *Building Lifecycle Report* assesses the long-term running costs of the proposed development such as property management and maintenance costs. It continues to outline measures taken in the scheme’s design to reduce the long-term financial costs to residents. These include:

- Use of high quality materials;
- Using as much direct sunlight to open spaces to reduce electricity usage;
- Using natural ventilation reduce energy consumption; and
- High quality paving, brick work, windows and all materials to reduce maintenance costs. In addition, measures are outlined to ensure that the long-term energy usage of the building is as low as possible; the application also includes an *Energy Statement* prepared by McElligott Engineers.

It is highlighted to the Board that the Applicant is at the forefront of residential development and has invaluable experience with respect to which materials offer a good quality finish that ensures efficiency and limited maintenance while still achieving a superior visual quality and aesthetic.

It is considered that the *Building Lifecycle Report* effectively demonstrates a range of measures which have been included to manage and reduce the costs for the benefit of future users in line with the requirements of Section 6.13 of the *Sustainable Urban Housing: Design Standards for New Apartments* (2018).

### 1.1.3 Item 3

***A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically with regards to overlooking, overshadowing and overbearing. The report shall include full and complete drawings illustrating daylight and sunlight analysis for existing and proposed apartments and all open space areas.***

The design team has sought to find an acceptable compromise between the need to maximise daylight levels and other relevant factors such as density, building form, overheating risk, privacy and the provision of balconies which are compliant with *Sustainable Urban Housing: Design Standards for New Apartments*.

A *Daylight and Sunlight Assessment* on the proposed development has been undertaken by Geraghty Engineers and is submitted as part of the application documentation. This report is prepared with cognisance to relevant BS, BRE, and CIBSE guidance as well as the overarching planning policies.

This report has assessed sunlight access and daylight access to neighbouring dwellings and within the proposed scheme.

The report concludes that sunlight levels at 29 no. relevant neighbouring dwellings to the north within the Pappan Grove/Bridgefield development will be largely unaffected. The calculations show that all relevant dwellings will comfortably exceed the guidelines and continue to receive excellent levels of direct sunshine throughout the year. With regard to daylight levels in the relevant neighbouring dwellings to the north, the majority (18 no.) will continue to receive daylight (ADF) levels above the minimum guidelines, 9 no. will fall only marginally below the threshold while 2 no. are well below. Having regard to the largely unaffected sunlight penetration and to the need to achieve the appropriate density in the proposed scheme, this limited shortfall should be acceptable.



Sunlight exposure calculations for the proposed scheme have determined that a significant area of the proposed internal courtyard will receive more than adequate levels of sunlight. The majority of outdoor open space will achieve or greatly exceed the minimum 2 hours of sunshine on 21 March. The surrounding areas receive very high levels of sunshine and the open area as a whole is considered to be satisfactory. With regard to daylight levels within the proposed scheme, it is concluded that 313 no. of the 331 no. proposed dwellings will meet or exceed the guidelines, which represents 95%. Of the remaining 18 no. dwellings, 8 no. are marginally below the guidelines and the remaining 10 no. (3% of the entire scheme) are well below. These dwellings however enjoy living environment compensatory factors including aspects towards attractive courtyard and landscaped areas, vistas of light-coloured brickwork, windows and doors continuing down to floor level and opening to large private-use balconies with glazed balustrading delivering practically uninterrupted views. Overshadowing from the existing trees along the east side of the development has also been considered and these are not likely to have a negative impact on the dwellings at the same elevation.

Overall, Geraghty Engineers are satisfied that daylight and sunlight provisions for the proposed scheme and the daylight and sunlight effects of the proposed scheme on neighbouring dwellings meet with guidance and recommendations.

### 1.1.4 Item 4

***Details of all areas designated for waste for both residential and commercial and the compliance with the minimum areas and recycling facilities in accordance with section 4.8 and 4.9 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).***

Provision has been made for the storage and collection of waste materials from the proposed development once occupied. Refuse facilities shall be accessible to each apartment stair/ lift core and have been designed with regard to the projected level of waste generation and types and quantities of receptacles required. The storage and collection of waste materials from the proposed development have included the recommendations as set out in the *Sustainable Urban Housing: Design Standards for New Apartments (2018)*. A *Waste Management Plan* deals with waste generation within the operational lifetime of the proposed development has been undertaken by KeyWaste Management Limited and is submitted as part of the application documentation. It is prepared in line with relevant guidance with the intention to reduce waste generation and ensure that facilities are incorporated in the development which encourage the recycling of waste. It outlines the requirement for selecting a suitably certified waste contractor, several of which operate in the area. Adequate storage for residential and commercial waste is provided; both recyclable and non-recyclable waste storage will be provided.

The *Architect's Design Statement* prepared by McCrossan O'Rourke Manning Architects confirms that:

- Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste;
- Waste storage areas are adequately ventilated so as to minimise odours and potential nuisance from vermin/flies and taking account the avoidance of nuisance for habitable rooms nearby;
- Provision in the layout ensures sufficient access for waste collectors, proximity of, or ease of access to, waste storage areas from individual apartments, including access by disabled people;
- Waste storage areas have been designed in order to not present any safety risks to users; and;
- Waste storage areas are not be visible to or accessible by the general public. Appropriate visual screening is provided.

The *Owners Management Company Operational Management Plan* for the overall development prepared by Wyse Property Consultants submitted as part of the application documentation includes how waste generated from the subject development will be managed.

### 1.1.5 Item 5

***A detailed schedule of accommodation which indicates consistency with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018) including a report which addresses the use of the residential support facilities.***

A *Housing Quality Schedule of Accommodation* indicating consistency between the proposed apartment and the relevant standards contained in the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2018) has been prepared by McCrossan O'Rourke Manning Architects. This schedule correlates with the fully dimensioned layout plans submitted with the application. The *Planning Report & Statement of Consistency* prepared by RPS provides further detail on this schedule and how the units proposed align with these New Apartments Guidelines.

The proposed development will provide residential support facilities which will be for the sole use of the residents of the scheme. These include shared residential services consisting of a multi-function area (c.133sq.m), a gym (c.140sq.m) and concierge area.

The proposed development also includes a childcare facility (c.224sq.m) and 5 no. ground floor mixed use units capable of accommodating class 1, 2, 8, café and restaurant uses with an overall total area of c. 939sq.m. The *Planning Report & Statement of Consistency* provides further details on these facilities.

A Technical Note prepared by AWN Consulting is included as **Appendix B** to this response and sets out the design measures that have been incorporated into the proposed development to ensure that the mixed use nature of the ground floor units and resident's gym in no way reduces amenity to the residents of the scheme.

The *Owners Management Company Operational Management Plan* for the overall development prepared by Wyse Property Consultants submitted as part of the application documentation includes how these functions will be managed.

### 1.1.6 Item 6

***A detailed report providing a rationale for the provision of an appropriate unit mix which provides consistency with the standards in the development and/ or the relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018) whichever is justified as necessary.***

A *Unit Mix Report* prepared by RPS is submitted as part of the application documentation setting out a clear rationale for the proposed unit mix and how it aligns with planning policy.

As set out in the report, the proposed development will comprise of 6 no. 1-bedroom units, equating to 1.9% of the total number of apartments. Regarding 3- bedroom units the development is comprised of 33 units (9.9% of the development). SPPR 1 contained in the Guidelines does not impose a minimum quantum of 1- bedrooled units and states there is no minimum requirements for 3-bedroom units. Indeed, it is noted that SPPR 1 does not set limits on the level of 2-bedroom type units that are provided in a single development.

Importantly it is highlighted that the Development Plan encourages an appropriate mix of units to be provided within new residential areas and does not include thresholds to which proposals must comply. In this regard the proposed development is compliant with both the Guidelines and the Development Plan. Furthermore, the Housing Strategy for the County notes that generally the housing stock in Fingal consists of 3-4-bedroom dwelling houses therefore the provision of 2-bedroom apartments units will assist in contributing towards choice. The Housing Strategy recognises that choice in the type of units is required in order to meet the needs of its existing and future population.

Taking these above points into consideration and an examination the household profile of the County the reports concludes that the proposed development will deliver 331 no. units is in line with NPF and play an important role towards contributing to the delivery of at least 25,000 new homes in Ireland by 2040. While the

proposed development is comprised of predominantly 2-bedroom units (292 units), the unit mix is well positioned to cater for Fingal's projected decreasing average household size and is consistent with national guidelines.

### 1.1.7 Item 7

***Submission of a car parking strategy including justification for the inclusion of proposed car parking numbers, indicating the allocation for designated car parking spaces for retail, commercial and/or residential, illustrating the location of any car parking spaces outside the red line, if any, and the proposed management of these spaces. The strategy shall also include details of any areas which are applicable for car club facilities and details for electric vehicle charging.***

With respect to the application of car parking standards as set out in the Development Plan to the proposed development there is a requirement for 510 no. residential spaces and 66 no. visitor spaces resulting in 576 no. spaces overall. With reference to the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* however the level of car parking proposed is considered in the context of an intermediate urban location where a reduced level of car parking is required. In order to determine an appropriate quantum of car parking at this location a review of CSO data was undertaken and revealed that the car ownership rate is approximately 1 no. car per household in the Northwood Area. Providing for this level of car parking to the proposed development results in 331 no. car parking spaces. No additional car parking spaces are proposed for visitors however visitor car parking demand can be met through shared usage of existing car parking spaces within Gulliver's Retail Park and in the basement as overall car usage declines overtime. The level of parking proposed for the apartments represents a reduced level of car parking on the site of over 40% based on the Development Plan management standards and is consistent with an intermediate urban location where a reduced level of car parking is required.

The proposed development also includes for 3 no. additional car parking spaces for disabled use within the basement together with 1 no. further disabled car parking space at surface level. It is noted that 3 no. car sharing spaces are provided at surface level.

A Cycle & Car Parking Strategy prepared by JB Barry & Partners Consulting Engineers contained within the *Traffic and Transport Assessment* and the Material Assets Chapter of the EIAR is submitted as part of the application documentation setting out a clear rationale for the proposed parking strategy and how it aligns with planning policy. This proposed car parking provision is also addressed in the *Planning Report and Statement of Consistency* prepared by RPS.

A *Multiple Occupancy Building Car Charging Strategy* prepared by McElligott Engineers is submitted as part of the application package. This report sets out a car charging power infrastructure and management strategy which can be implemented in multioccupancy developments. The aim of this strategy is to allow for the efficient installation of new and future car charging points within multioccupancy residential developments, while avoiding large capital and lifetime running costs for the car charging end users, and residents of the of the same development not availing of the car charging services. Items addressed in the report include:

- Car charging strategy.
- Provision for future car charging points.
- Car charging infrastructure layout.
- Management of car charging system.

An *Owners Management Company Operational Management Plan* prepared by Wyse Property Consultants is also submitted as part of the application documentation setting out management details of the proposed development, including car parking spaces, once operational.

### 1.1.8 Item 8

***Inclusion of a cycling strategy in any traffic impact assessment, detailing the appropriate provision of bicycle parking in line with national and/or local standards and include details of all surface parking ensuring appropriate longevity and shelter.***

With respect to bicycle parking and storage, 690 no. resident bicycle parking spaces are proposed which equate to 1 no. bicycle parking space per bedroom. These spaces are secure and sheltered within secured enclosed spaces in the basement. The spaces do not include stacking mechanisms and can be used by all cyclists.

The proposed development also provides for additional an 70 no. sheltered bicycle parking spaces at surface level, giving a total provision of 760 no. spaces.

The provision of bicycle parking is considered to be appropriate given the level of public transport which services the proposed development. There is the opportunity in the future to provide additional bicycle parking spaces if it is found there is additional bicycle parking demand through the reallocation of existing surface car parking spaces adjacent to the proposed development.

During consultation with Fingal County Council at the Preplanning and Tripartite meetings it was noted that if the applicant proposes to reduce the level of car parking below the Development Plan requirement then the level of bicycle parking would need to be increased. The Development Plan requirement for bicycle parking spaces equates to 1 no. per apartment and 1 no. visitor parking space per 5 no. apartments resulting in 397 no spaces. In this regard, the Applicant is reducing the level car parking required below the Development Plan but is providing twice the level of bicycle parking spaces required by the Development Plan.

Additionally, 5 no. motorcycle parking spaces will be available in the basement level.

A Cycle & Car Parking Strategy prepared by JB Barry & Partners Consulting Engineers is submitted as part of the application documentation setting out a clear rationale for the proposed parking strategy and how it aligns with planning policy. This proposed bicycle parking provision is also addressed in the *Planning Report and Statement of Consistency* prepared by RPS.

A *Site Specific Management Plan* prepared by Wyse Property Consultants is submitted as part of the application documentation setting out management details of the proposed development, including bicycle parking spaces, once operational.

### 1.1.9 Item 9

***Childcare demand analysis, including but not restricted to the justification for size of the proposed creche, having regard to the existing childcare facility in the residential development to the north, the likely demand and use for childcare places and the accommodation of additional requirement resulting from the proposed development.***

The proposed development will contain 331 no. residential units comprising of 6 no. 1-bedroom units, 292 no. 2-bedroomed units and 33 no. 3-bedroomed units. Using a strict application of the Childcare Guidelines to the level of residential units proposed, the development would generate a requirement for 88 no. childcare spaces. At the Tripartite Preapplication Meeting it was noted by An Bord Pleanála that the 72 no. place childcare facility proposed as part of the preapplication submission may provide places in excess of demand thereby rendering the unit vacant in the longer term. Notwithstanding the Childcare Facility Guidelines, the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* acknowledge the need to consider the level of childcare facilities required for new residential schemes based on the unit mix proposed. It is also noted that the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* acknowledge the need to consider the availability of existing childcare facilities in an area as there may be enough provision to accommodate the demand generated by new residential schemes.

In order to determine a more appropriate level of childcare spaces to be provided, the following factors were considered:

- Level of current and permitted childcare facilities in the vicinity.
- Demographic profile
- Estimate of Demand
- Consultation with industry operators and Fingal Childcare Committee.

Following a review of these factors the analysis concludes that it is legitimate to reduce the baseline requirement for childcare places to 48 no. spaces. The proposed development has therefore made provision for a smaller childcare facility to ensure that services are provided to the local community without compromising other operators in the area and preventing unit vacancy.

A *Childcare Demand Analysis* prepared by RPS is submitted as part of the application documentation setting out a clear justification for the proposed childcare facility and how it aligns with planning policy and prospective demand for childcare spaces in the Northwood Area.

### 1.1.10 Item 10

#### ***Inclusion of a Social and Community Audit of the schools in the vicinity in particular school going children.***

A *Social and Community Audit of Schools* prepared by RPS is submitted as part of the application documentation setting out the prospective demand for school spaces in the Northwood Area. This report identifies the current levels of enrolment of existing schools within the vicinity of the subject site and the demand for school spaces likely to be generated by the proposal, comprising 331 no. residential units.

Based on national average household size and proportion of the population of school going age it is estimated that appropriately 109 primary school places (or 14 per school year) and 72 secondary school places (or 12 per school year) will be required. It is highlighted however that the NFP projects the average household size to decline to 2.5 by 2040. As the household size declines then ultimately the level of school places required by the proposed development once completed will also decrease. It is also noted that the unit mix proposed is predominantly 2-bedroomed apartment units where the average household size would be generally lower than the national averages at 2.1.

The audit notes that provision of school places is within the remit of the DES. In this regard the planned provision of a schools within the relevant School Planning Area as documented by the DES will further increase the availability of places for future students by 2019. This includes an additional 208 no. spaces for the 2019 enrolment period with the completion of the 1 no. primary school in the South Swords School Planning Area. The provision of this new school is in addition to other projects recently completed and currently under progress in the general area of the proposed development. In this regard the requirement for new schools and capital improvements is the subject of on-going review by DES and which includes monitoring school place provision in all areas.

Having regard to the existing and proposed provision of schools in the surrounding area, given the site's accessibility to nearby public transport meaning a larger catchment of schools is accessible and recognising that the unit mix proposed is predominately 2-bedroomed apartments where the occupancy rate is generally lower, it is considered that the existing capacity of primary and secondary schools is sufficient to cater for the proposed development.



### 1.1.11 Item 11

***A Site Specific Management Plan which includes details on management of the retail units, communal areas, public space, residential amenity and apartments.***

An *Owners Management Company Operational Management Plan* prepared by Wyse Property Consultants is submitted as part of the application documentation setting out management details of the proposed development once operational. This plan sets out details on the management of the ground floor mixed use units, communal areas, communal open spaces, public spaces, parking and operational waste management for the overall development.

### 1.1.12 Item 12

***The information referred to in article 299B (1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.***

An Environmental Impact Assessment Report (EIAR) managed by RPS is submitted as part of the application documentation.

## 2 CONSULTATION

The bodies listed in the Opinion which are to be notified that this application is being made are:

- Transport Infrastructure Ireland
- National Transport Authority
- Irish Water
- Dublin County Childcare Committee (Fingal)
- Commission for Energy Regulation
- Irish Aviation Authority
- Dublin Airport Authority.

**Appendix A**

**Pre-Application Consultation Opinion**

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**Helena Gavin**  
Director - Planning  
T +353 1 488 2900  
E [helena.gavin@rpsgroup.com](mailto:helena.gavin@rpsgroup.com)

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**From:** Paul OBrien <Paul.OBrien@fingal.ie>  
**Sent:** Thursday 7 March 2019 11:44  
**To:** Helena Gavin <helena.gavin@rpsgroup.com>  
**Cc:** Claire McVeigh <Claire.McVeigh@fingal.ie>; Gemma Carr <Gemma.ECarr@fingal.ie>; Niall Thornton <Niall.Thornton@fingal.ie>; Phillip Grobler <Phillip.Grobler@fingal.ie>  
**Subject:** Northwood Meeting Notes

**CAUTION:** This email originated from outside of RPS.

Hello Helena,

Apologies for the delay in sending these on, but I have been side tracked with other meetings in here. I think the notes are clear enough but if you have any queries please contact me.

Regards

Paul

Paul O'Brien | Executive Planner  
Swords Area  
Fingal County Council | Planning & Strategic Infrastructure Department  
County Hall | Main Street | Swords | Co. Dublin | Eircode: K67 X8Y2  
T: +353 (0)1 890 5699 | E-mail: [paul.obrien@fingal.ie](mailto:paul.obrien@fingal.ie)

25  
BLIANA  
YEARS

Comhairle Contae  
Fhine Gall  
Fingal County  
Council



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**Title:** Northwood, Santry S.247

**Meeting Date:** 5<sup>th</sup> March 2019

**Site Location:** Northwood, Santry.

**Attendees:** **List attached.**

The proposed development was presented and the following are the main issues raised/ subsequently commented on.

1. Design and layout of development:

The development will provide for a total of 332 apartment units consisting of:

- 1 Number: One Bedroom unit
- 277 Number: Two Bedroom units
- 54 Number: Three Bedroom units
  
- A total of 1,030 sq m of retail floor area – 4 to 5 units.
- Childcare facility of 324 sq m
- Basement level providing for car parking and storage.
- Apartments are intended to be sold on the market.
- Issue of gym within the apartment block – Will be referred to the EHO for comment.

The development consist of four blocks (A to D) providing for 7 storeys with a penthouse 8 storey level. Design will be similar to that in Bridgefield to the north of the site. Details provided on the elevational treatment and indicated on submitted plans. A plaza is to be provided to the west/ south west of the south. This will be suitable for outdoor dining and amenity. The site will include screening to the west – interface with Gulliver’s Retail Park.

The site area is given as 1.5 hectares thereby providing a density of 221 units per hectare.

2. Site Issues:

- The site is zoned ME – Metro Economic Corridor.
- The proposed Metrolink route is to the west of the site adjacent to the old Ballymun Road. Existing public transport provision in the area is on the Swords Road, Ballymun Road and Santry Avenue.
- Requirement for a Masterplan on these lands – Applicant to address how it will not prejudice this.
- Within the Outer Airport Noise Zone (OANZ) – Applicant to provide full noise assessment and suitable mitigation measures.

3. Water Services:

- Contact has been made with Irish Water regarding pre-connection agreement.
- Attenuation in tank to the north of the site, existing for Bridgefield has capacity. Will look at other means of attenuation – tree pits, swales etc.



- A pumping station will be required for drainage from the basement, rest will be gravity fed.
- Ensure that all consents are obtained.

#### 4. Transportation and parking:

- Traffic counts have been undertaken in locations agreed with by Transportation Planning. Results are under preparation.
- Car parking requirement is 634 according to Development Plan. This may be reduced to 386 spaces but has to be justified with suitable detail.
- Parking spaces shall provide for electric charging/ be future proofed for this.
- 2 bicycle parking spaces per unit, suitably secured.
- Crèche parking and set down areas to be provided and include staff parking. Should not allow for reverse manoeuvres.
- Contribution towards upgrade of Northwood Avenue/ Ballymun Road Junction. This will provide for SCATS controlled signals.

#### 5. Landscaping and open space:

##### 5.1 Existing trees:

- Santry and Northwood are subject to a TPO – Noted.
- Require full tree survey, Arborist Report ensuring full details on the protection of trees. This report will inform the layout and set back/buffer required for these protected trees.
- The proposed landscaping /treatment of the ditch in the vicinity of the existing trees needs further discussion between the drainage consultants and the arborist. In general ditches in public areas attract dumping and anti-social behaviour. If possible, it would be best if the ditch can be filled and the area grassed.
- Full details of any proposed 'No dig solution' paths should be referenced in the Arborist's report.

##### 5.2 Street trees:

- Requirement for minimum rooting volume of 16 cubic metres in constructed tree pits.
- Detail of the constructed tree pit to be provided.
- No services within 2.5m of proposed trees.
- No street tree within 7m of lamp standards

##### 5.3 Landscape plan:

*The landscape plan shall include the following:*

- Services including proposed lamp standards.
- Area (in sq. metres) of open space and playground provision in accordance with Development Plan standards.
- Outline of constructed tree pit area.
- Playground surface and equipment to be in accordance with BS EN 1176 and 1177. Play equipment to be provided / accessible for disabled users. (N.B. - Details of management maintenance to be included – RoSPA certification (or equivalent) frequency of checks and record keeping)
- No incidental grass margins (less than 1 metre in width) which are unsustainable to maintain.

- Naturalised bulb planting and use of pollinator friendly species (in accordance with the National Pollinator Plan)
  - Proposed tree planting to reflect where possible the tree species of the adjoining designed landscape of Santry Park.
  - Further consideration is required on proposed landscaping adjoining Gulliver Retail Park – in order to create a substantial visual separation/ green buffer zone between the vast area of car parking and the proposed apartment units.
  - The development will provide for a 'Green Route' through the southern edge of the site and continue through the Gulliver car park in the direct of the Old Ballymun Road. Will include cycle and pedestrian route with landscaping.
  - Bin stores, bike stores and sub-stations shall not be located on or directly adjoining open space areas (to avoid anti-social activity)
  - The Open Space Design Statement to clearly state how public open space provision and playground provision as well as communal open space provision is being dealt with. Emphasis to be given on the usability of the open space areas for various age groups.
7. Taking in charge drawing – Should design the services and open space to taking in charge standard.
8. Public Art to be provided following agreement with Fingal County Council Arts Office.
9. Other Assessments:
- Appropriate Assessment
  - EIS
  - Noise Assessment – OANZ.
  - Archaeology
  - Daylight and shadow assessments.
  - Design Statement – DMS03 of the Fingal Development Plan 2017 – 2023.
  - Longer term at construction stage – May require a crane use strategy having regard to the proximity of the development to the airport.

**Conclusion:**

The applicant agreed to consider these matters and another meeting is to be arranged before progressing to next stage.

## **Attendees**

### Planning Authority (FCC):

Paul O'Brien Executive Planner,  
Claire McVeigh Senior Executive Planner,  
Niall Thornton Thornton Senior Executive Engineer,  
Gemma Carr Senior Executive Parks Superintendent,  
Philip Grobler

Applicant (Cosgrave): Michael Cosgrave  
Applicant's Planners (RPS): Helena Gavin,  
Applicant's Planners (RPS): Mike Higgins  
Applicant's Architects (MCORM): Gerard O Neill  
Applicant's Engineers (JBB): Gary Flood  
Applicant's Landscape Architect (KFLA) Simone Kennedy

---

**Helena Gavin**  
Director - Planning  
T +353 1 488 2900  
E [helena.gavin@rpsgroup.com](mailto:helena.gavin@rpsgroup.com)

---

**From:** Paul O'Brien <Paul.O'Brien@fingal.ie>  
**Sent:** Friday 17 May 2019 10:47  
**To:** Helena Gavin <helena.gavin@rpsgroup.com>  
**Cc:** Claire McVeigh <Claire.McVeigh@fingal.ie>  
**Subject:** Northwood

**CAUTION:** This email originated from outside of RPS.

Hi Helena,

Sorry I was meant to do up quick notes on this. There are no major issues from my point of view. I think we covered the main issues in the last meeting.

Regards

Paul

Paul O'Brien | Executive Planner  
Swords Area  
Fingal County Council | Planning & Strategic Infrastructure Department  
County Hall | Main Street | Swords | Co. Dublin | Eircode: K67 X8Y2  
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**25**  
**BLIANA**  
**YEARS**

**Comhairle Contae**  
**Fhine Gall**  
Fingal County  
Council



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**Title:** Northwood, Santry S.247

**Meeting Date:** 2<sup>nd</sup> May 2019

**Site Location:** Northwood, Santry.

**Attendees:** **List attached.**

The proposed development was presented with modifications and updates from the meeting of the 5<sup>th</sup> of March 2019. The following are the main issues raised/ subsequently commented on.

1. Design and layout of development:

The development will provide for a total of 332 apartment units. The site is slightly increased from 1.5 hectares to 1.8 hectares; this is primarily through the inclusion of a pedestrian/ green route from the site through the Gulliver's Car Park to the site of the Metrolink stop. The route to be at grade with extensive tree/ shrub planting. Suitable lighting will be approved along this route. The applicant was advised that the lighting should be of a different type to that of the existing car park.

- The blocks range in height from 7 to 8 storeys (7 with setback). Issue of 45 m with regards to the airport.
- Retail and other commercial uses at ground floor level.
- Colonnade on the south elevation.
- Use of sedum on the roof. To be set in 40 m sections to act as a fire break etc.

2. Surface water drainage:

- Ditch with trees on the roadside. There is a potential to fill this ditch to provide for additional surface water drainage.
- May use Stormtech for water attenuation.
- Use of permeable paving and attenuation tank.

3. Parks and Green Infrastructure:

- Reinforced grasstech to be used for fire access in certain locations. Need for a root barrier in the vicinity of trees.
- Lighting to be indicated on all submitted plans. Should include details on the depth of the light standard etc. below GL.
- Need for a softer edge along the western boundary.
- 16 cubic metres constructed tree pits.
- Issue of falls etc. in amenity areas especially those not taken in charge.
- Playground to centre of the site should be universally accessible – make allowance for this. Location of the playground with regards to apartment units to be carefully considered.
- Play facilities to be in accordance with apartment guidelines.

4. Car parking and transport:

- One car parking space per unit to be provided.
- Make provision (ducting or charging points) for electric cars.

5. Other issues:

- Environmental Impact screening – sub threshold but consider issue of cumulative impacts of development.
- AA screening.

## **Attendees**

### Planning Authority (FCC):

Paul O'Brien Executive Planner,  
Niall Thornton Senior Executive Engineer,  
Gemma Carr Senior Executive Planner,  
Applicant (Cosgrave): Michael Cosgrave  
Applicant's Planners (RPS): Helena Gavin,  
Applicant's Planners (RPS): Mike Higgins  
Applicant's Architects (MCORM): Gerard O Neill  
Applicant's Engineers (JBB): Gary Flood

**Appendix B**

**Residential Amenity and Ground Level Units  
prepared by AWN Consulting**

**DK/18/10495NL01**  
**29 August 2019**

**Cosgrave Developments**  
**C/o RPS Group**  
**West Pier Business Campus**  
**Dun Laoghaire**  
**Co. Dublin**

Dear Sir / Madam,

**RE: STRATEGIC HOUSING DEVELOPMENT PROPOSAL AT NORTHWOOD, SANTRY DEMESNE**

AWN has prepared the following comments in response to specific issues highlighted in the Fingal County Council (FCC) report on the above-named proposed development (FCC File Reference: PPSHD/015/19). In the first instance it is noted that a detailed noise assessment has been completed as part of the Environmental Impact Assessment Report (EIAR) submitted for the proposal. This deals with various aspects of noise associated with the proposed development including construction noise and operational noise associated with the development.

The FCC report comments on potential noise and vibration issues in relation to the proposed gym and services and other noise associated with the proposed retail units. The following additional comments are presented in relation to these specific issues.

#### Gym Noise & Vibration

In the first instance it should be noted that the scheme will be managed and controlled by a management company and as part of their role the usage and activities of the gym space will be controlled.

In terms of airborne noise this can be addressed by the following:

- The floor slab itself will offer some 60 to 65dB  $D_{nT,w}$  of acoustic separating between the gym and spaces above.

- This exceeds comfortably the Part E requirements and would be suitable considering the proposed usage.
- The activities in the gym will not cater for 'professional' classes where high levels of music (e.g. instructor shouting instructions to be heard over music) might be expected. In the proposed private gym low levels of background music or a TV in the background only (i.e. normal conversation is possible) will pertain.
- In terms of vibration, this is typically associated with weight training. It is understood that the management company cannot insure weight training as such an activity needs to be supervised, therefore potential vibration associated with weight training will not be an issue in the private gym (i.e. for use of residents only).

Finally, it is also important to note that similar gyms of the nature proposed here are operated without issues in similar developments, constructed by Cosgrave Developments.

### Retail Services

This issue raised in the FCC report can be addressed as follows:

- Services for the retail units will be ducted through the core to the roof. As part of detailed design by the tenants' suitable system attenuation will be incorporated in order to address any potential noise impacts. Such requirements will be inserted into tenant agreements in order to address this issue.
- In terms of patrons using external areas we would note the following:
  - o *Management protocols for the commercial units shall be put in place. It is in the long-term interest of management that holders of the residential units not to have noise issues on site and this has fed into the campus management structure which they control.*
  - o *The installed glazing on the apartments and winter gardens has a high specification (some 35dB  $R_w$  – standard glazing would offer some 30dB  $R_w$ ) which will protect the internal amenity and note all the units have heat recovery units and are in essence mechanically ventilated removing the need to open windows to ventilate these spaces.*

In addition, it is noted that the noise assessment contained in the EIAR submitted for the development outlines a detailed noise assessment of potential aircraft movements associated with the nearby Dublin Airport as requested by FCC.

Please do not hesitate to contact me if you have any questions in relation to the issued discussed here.

Yours sincerely,



**DAMIAN KELLY**  
Director (Acoustics)