

Planning Report

Proposed SHD

**Lands at Cornelscourt Village,
Old Bray Road, Cornelscourt,
Dublin 18**

On behalf of

Cornel Living Limited

December 2019



Planning & Development Consultants

63 York Road,

Dun Laoghaire,

Co. Dublin

www.brockmcclure.ie

1	EXECUTIVE SUMMARY	3
1.1	The Site	3
1.2	The Proposal	3
1.3	The Build to Rent Model	4
1.4	Current Statistics	4
1.5	National Policy Mandate	5
1.6	Planning Authority Engagement	6
1.7	Scheme Highlights	6
2	INTRODUCTION	7
2.1	Context for the lodgement of this Planning Application	7
2.2	Hard and Digital Copies	7
2.3	Report Structure	8
3	THE SITE	9
3.1	Surrounding Area	10
3.2	Access to Public Transport	10
4	THE BUILD TO RENT MODEL	11
4.1	The BTR Concept	11
4.2	BTR Housing and Planning Policy	12
4.3	Key Demographics	13
4.4	The Local Rental Market	15
4.5	Suitability of the Site for BTR Development	16
5	NATIONAL POLICY CONTEXT	20
5.1	Project Ireland - National Planning Framework (2040)	20
5.2	Rebuilding Ireland: Action Plan for Housing and Homelessness	22
5.3	Regional Spatial and Economic Strategy	23
5.4	National Policy Summary	25
6	PLANNING HISTORY	26
6.1	Subject Site	26
6.2	AIB Bank Site	27
6.3	Precedent Development along the N11	29
6.4	Statutory Notice Check	30
7	SECTION 247 - PRE-PLANNING	32
7.1	Pre-Planning Meeting	32
8	STRATEGIC HOUSING DEVELOPMENT - PRE - PLANNING REQUEST	36
8.1	Planning Authority Opinion	36
8.2	Pre-Planning Meeting	39
8.3	An Bord Pleanála Opinion	40
9	THE PROPOSAL	41
9.1	Development Summary	41
9.2	Site Layout	42
9.3	Residential Development	42
9.4	Dual Aspect	43
9.5	Heights	43
9.6	Residential Tenant Amenity Space	46
9.7	Café / Restaurant and Office Space	50
9.8	Density	51
9.9	Private Open Space Provision	52
9.10	The Landscape Plan	52
9.11	Car Parking	58
9.12	Motor Cycle Parking	60
9.13	Cycle Parking	60
9.14	Plot Ratio/Site Coverage	60
9.15	Integration with Surrounding Uses	60
9.16	Part V Provision	60
9.17	Additional Proposals	60
9.18	Environmental Impact Assessment Report	61
10	CONCLUSION	62
11	APPENDIX 1 - PRE-PLANNING MINUTES AND CORRESPONDENCE WITH DLR	63
12	APPENDIX 2 - TIC LETTER	71
13	APPENDIX 3 - PRE-PLANNING MINUTES WITH AN BORD PLEANALA	72
14	APPENDIX 4 - BLEEPER BIKE SUPPORT	78

1 EXECUTIVE SUMMARY

Our Client **Cornel Living Limited, Riverside One, Sir John Rogerson's Quay, Dublin 2**, has instructed Brock McClure Consultants, 63 York Road, Dun Laoghaire, Co. Dublin to lodge this Strategic Housing Development (SHD) planning application to An Bord Pleanala.

Cornel Living Limited is part of the Ardstone Group.

A summary of the main points of this report are set out below:

1.1 The Site

The site extends to c. 2.14 ha on greenfield lands bounded to the north-east by the N11, to the south-east by Willow Grove residential estate, to the south-west by Cornelscourt Neighbourhood Centre and to the north-west by AIB lands. The site is located c.270m west of Cornelscourt District Centre. Vehicular access to the site is provided from the Old Bray Road.



Figure 1 - Site Location Plan

1.2 The Proposal

The application provides for a Build to Rent development consisting:

- 468 residential units (452 apartments and 16 houses) as follows:
 - 41 no. studio apartment units,
 - 257 no. 1 bed apartment units,
 - 136 no. 2 bed apartment units;
 - 18 no. 3 bed apartment units;
 - 10 no. 3 bed semi-detached house units; and
 - 6 no. 1 bed bungalow units.

- A café / restaurant of c. 140 sq m; office space of 149 sq m; concierge of c. 149 sq m; and a residential tenant amenity space of c. 458 sq m is also proposed.
- 274 Car Parking Spaces (273 at basement level and 1 at surface level)
- 12 Motor Cycle Spaces
- 616 Bicycle Parking Spaces
- Public Open Space
- Vehicular Access
- Basement Areas
- 3 Sub Stations and 3 Switch Rooms
- All Associated Site Development Works

Section 9 of this report sets out a detailed analysis of the extent of the proposal currently submitted.

1.3 The Build to Rent Model

The scheme offers an exemplar Build to Rent (BTR) development of 468 units in the heart of Cornelscourt, Village, Dublin 18. From the outset of the assessment of this scheme, it should be duly noted that this is a class leading BTR scheme with the focus on delivery appropriate house sizes to meet changing demographic demands. The focus for the current proposal is on the occupants with appropriately designed private apartments supplemented by excellent communal space and tenant amenities. The BTR principle applied to the site delivers a viable long-term housing solution beyond traditional home ownership for those seeking an alternative to our current housing model. The BTR model delivered here consists of rental properties as opposed to privately owned homes, which is a new and exciting way to meet the housing needs of key sectors of our society including a young and increasingly internationally mobile workforce, as well as older persons who want to live independently.

A key component of successful Built-to-Rent developments is a generous provision of well-considered and high-quality amenity spaces for the benefit, comfort and convenience of the residents. The applicant has visited a large number of existing schemes across both Europe and The United States, and has used this experience to design a best in class offering for Cornelscourt. The scheme therefore consists of purpose built rental residential units which are centrally managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable management of apartment stock.

There is a commitment for the current BTR proposal to remain as a managed accommodation for 15 years, where no individual units can be sold or rented separately for this period of time. A draft legal covenant to this effect is enclosed in the Statement of Consistency enclosed herewith.

1.4 Current Statistics

Current statistics have confirmed that the average household size in Dublin is steadily decreasing. In 2016, the average household size in Dublin (city and suburbs) was 2.73 persons per household. This is down from 2.99 in 1996 and 3.94 in 1971. The proportion of 1 and 2 person households within the Dublin suburban area is also increasing, up from 42.8% in 1996 to 50.8% in 2016 ^a

The pattern of falling household sizes is set to continue and this is something that must be addressed by the introduction of new housing models. The proportion of adults living alone has also increased

^a “Demographic Drivers & Changing Housing Demands in Dublin over the coming decade”, Future Analytics, February 2019

between 1996 and 2016 and population of Dublin is further set to expand with a population of 1.60 million expected by 2029.

Furthermore, it is apparent that 18.9% of Irelands population currently lives in private rented accommodation. The percentage of people living in rented accommodation in Dublin however, remains higher than the nationwide percentage at 24.3% compared to 16.8% outside Dublin.^b

When this empirical evidence is considered, the rationale for the delivery of BTR development comes to the fore. BTR development is a critical solution to addressing falling household sizes, demographic change and an increasing population. It is not intended to replace the traditional house ownership model, but provides an attractive option to a certain cohort of the population.

The subject BTR proposal is an exceptionally well considered scheme, based on the models of international best practice, with ready access to excellent amenities such a resident lounge, gyms, reading areas, concierge facilities and immediate access to frequent public transport at the N11.

1.5 National Policy Mandate

This planning application has been prepared in the context of recent updates to national planning policy, which have directed the design approach from the outset. We specifically refer to the policy mandate set out in 'Project Ireland 2040: National Planning Framework', the 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)' and 'Urban Development and Building Heights: Guidelines for Planning Authorities (2018)'.

These documents are key national policies that seek the expedient delivery of quality urban residential development of an increased height and density at suitable locations.

Within the above documents, it has been identified that a significant and sustained increase in housing output and apartment style development is necessary to support government policy. National policy further supports and reinforces the need for urban infill residential development in close proximity to quality transport routes and within existing urban areas.

Furthermore, BTR development is a new concept introduced by the government by way of the 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)'. The introduction of this model is on the back of the publication of the Rebuilding Ireland Initiative - An Action Plan for Housing and Homeless, which has a specific focus on the delivery of rental accommodation. It has been recognised that the traditional dominance of the build to sell model must evolve to provide for increased delivery of housing intended specifically for rental purposes.

The overall vision here is for a strong, viable and attractive rental sector supported by a policy and regulatory framework that delivers long term affordable and high quality accommodation solutions meet diverse tenant needs, and a secure, predictable investment environment for landlords and accommodation providers.

Given the site's residential zoning; proximity to public transport; and accessibility to local services, the current proposal is considered to fully accord with national policy objectives. More specifically, the delivery of quality residential development on this prime, infill, underutilised site in a compact form, is wholly consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

Furthermore, the current proposal encapsulates the Pillar 4 vision of Rebuilding Ireland and delivers a move towards an attractive rental sector the Cornelscourt area, through the delivery of a high quality rental accommodation offer to meet local demand for smaller units.

^b Shifting Ownership in Irelands Private Rented Sector' Savills, (December 2017)

1.6 Planning Authority Engagement

This Planning Report sets out response pieces to:

- The Pre-Planning Section 247 meeting that took place between the applicant and Dun Laoghaire Rathdown County Council
- The Planning Authority Opinion lodged on the pre-planning application submitted to An Bord Pleanála.

A separate report and response piece to the ABP opinion issued is enclosed as part of the application.

1.7 Scheme Highlights

- The scheme offers a world class Build to Rent (BTR) offer of 468 units in the heart of Cornelscourt Neighbourhood Centre. It is an exceptionally well considered scheme, based on the models of international best practice, with ready access to excellent amenities such as a resident lounge, gyms, reading areas, concierge facilities and immediate access to frequent public transport at the N11.
- The site is optimally located to provide for a Built to Rent development, higher residential density and additional height as directed by National Planning Policy. The Build to Rent units are of excellent quality, with generous floor areas, open space provisions, connections to public transport and sufficient car parking facilities.
- The site has the benefit of exceptional access to public transport facilities including a quality bus corridor along the N11 and the Luas 1.8km from the site.
- Demographic research for the Dublin Suburbs supports the delivery of smaller unit typologies and subject scheme has been developed as a direct reflection of key demographic findings.
- The development has been the subject of a new landscape proposal delivered by Cameo & Partners and delivers open space provision in the region of 7,511 sq m, which is an exceptional level of provision for a BTR scheme.
- Careful attention has been given to permeability with the surrounding context. We note specifically that 2 new connections are facilitated within the scheme. The first is a pedestrian and cycle link to the N11 and the second is a pedestrian connection to the adjoining Willow Grove residential development.
- The proposal also offers significant planning gain to the area by way of new pedestrian and cyclist connections to Cornelscourt Neighbourhood Centre and the N11; and the delivery of a new café /restaurant, which will improve the vibrancy of Cornelscourt Neighbourhood Centre.

2 INTRODUCTION

Our Client **Cornel Living Limited, Riverside One, Sir John Rogerson's Quay, Dublin 2**, has instructed Brock McClure Consultants, 63 York Road, Dun Laoghaire, Co. Dublin to lodge this Strategic Housing Development (SHD) planning application to An Bord Pleanala.

Cornel Living Limited is part of the Ardstone Group, which has almost 20 years experience in the design and development of high quality residential and commercial properties.

The proposed development has been designed based on the Ardstone Group's professional experience and on best practice international examples. The development proposal provides for of 468 BTR residential units (452 apartments and 16 houses), a café / restaurant, office space (for tenants) and residential tenant amenity space, all located on a site of c. 2.14 ha on lands at Cornelscourt Village, Old Bray Road, Dublin 18.

It is now mandatory that this application, proposing in excess of 100 residential units, is considered under the provisions of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended and the Planning and Development Regulations 2001, as amended.

2.1 Context for the lodgement of this Planning Application

This strategic housing development planning application is lodged in accordance with Part 2 Section 4 (1) of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following requirements:

(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—

(a) an application for permission for a strategic housing development shall—

(i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,

(ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),

(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,

(iv) be in such form and contain such information as is prescribed, and

(v) be accompanied by the appropriate fee,

and

(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.

This planning application is lodged in compliance with the above requirements and particularly those set out in Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016.

2.2 Hard and Digital Copies

In relation to the release of hard and soft copies, we note the following:

- **2 hard copies and 3 digital copies of all material is now submitted for review by An Bord Pleanala.**
- **6 hard copies and 1 digital copy of all material has been issued to the Planning Authority of Dun Laoghaire Rathdown County Council in advance of this submission.**
- **1 digital copy has been issued to each of the 3 Prescribed Bodies identified by An Bord Pleanala in the formal opinion issued under ABP-304647-19**

2.3 Report Structure

This planning report is structured to address the following:

- **Section 3** reviews the Site Context.
- **Section 4** reviews the BTR Model.
- **Section 5** reviews the National Policy Context for the site.
- **Section 6** sets out the Planning History associated with the site and immediate area. A statutory notice check is also set out.
- **Section 7** sets out details of the Section 247 pre-planning stage for the project.
- **Section 8** outlines the pre-planning stage of the project with An Bord Pleanála.
- **Section 9** describes in detail the extent of the proposal submitted.
- **Section 10** sets out a couple of concluding points associated with the proposal.

3 THE SITE

The site has the benefit of an extensive site area at c. 2.14 ha on greenfield lands bounded to the north/east by the N11, to the south/east by Willow Grove housing, to the south/west by Cornelscourt Neighbourhood Centre and to the north/west by AIB lands. The site is located c.270m west of Cornelscourt District Centre. Vehicular access to the site is provided via the Old Bray Road.

An aerial view and site location map for the subject site is identified in Figures 2 and 3 below.



Figure 2 - Subject Site (shaded red)



Figure 3 - Site Location Plan

3.1 Surrounding Area

The land use context in the vicinity of the site ranges from residential to commercial including a Service Station, offices, shops and restaurants. The site is proximate to the Cornelscourt District Centre and offers the opportunity to complete the street frontage along Old Bray Road in the Neighbourhood Centre. The superb location of the site between the N11 and the Neighbourhood Centre also offers a significant opportunity for increased pedestrian and cyclist permeability and this is a fundamental factor in assessment of the potential associated with the site. The additional population arising from this development will add activity and vibrancy to the core of Cornelscourt, thereby supporting the viability of the existing commercial offering.

3.2 Access to Public Transport

The site is exceptionally well located in terms of access to existing public transport.

Bus - The site itself is directly bounded by the N11 Quality Bus Corridor or Bus Priority Route to the north with bus services to the City Centre running every 6 minutes on average. The N11 route also features dedicated cycle tracks connecting to the wider cycle network throughout the county.

Luas - The nearest LUAS stop is located at Carrickmines Park & Ride (c. 1.8km). The site is located within the boundary of the catchment area for additional Development Contributions relating to the extension of the LUAS line to Cherrywood.

4 THE BUILD TO RENT MODEL

The application proposes Build to Rent (BTR) accommodation in the form of 452 new apartments and 16 new houses, together with associated and ancillary facilities and services.

4.1 The BTR Concept

From the outset of the assessment of this scheme, it should be duly noted that this is a world class leading BTR scheme with the focus on delivery of appropriate house typologies to meet changing demographic demands.

BTR is a new residential concept, which provides for purpose-built residential accommodation and associated amenities built specifically for long-term rental. This form of development is managed and serviced in an institutional manner by an institutional landlord. BTR units avail of residential support facilities, services and amenities.

The focus for the current proposal is on the occupants with appropriately designed private apartments supplemented by excellent communal space and tenant amenities. The BTR principle applied to the site delivers a viable long-term housing solution beyond traditional home ownership for those seeking an alternative to our current housing model. The BTR model delivered consists of rental properties as opposed to privately owned homes, which is a new and exciting way to meet the housing needs of key sectors of our society including a young and increasingly internationally mobile workforce, as well as older persons who want to live independently.

The delivery of a BTR model at this site directly responds to the finding that 18.9% of Irelands population currently lives in private rented accommodation. The percentage of people living in rented accommodation in Dublin however, remains higher than the nationwide percentage at 24.3% compared to 16.8% outside Dublin.^c

A key component of successful Built-to-Rent developments is a generous provision of well-considered and high-quality amenity spaces for the benefit, comfort and convenience of the residents. The applicant has visited a large number of existing schemes across both Europe and The United States, and has used this experience to design a best in class offering for Cornelscourt. The scheme therefore consists of purpose built rental residential units which are centrally managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable management of apartment stock.

There is a commitment for the current BTR proposal to remain as a managed accommodation for 15 years, where no individual units can be sold or rented separately for this period of time. A draft legal covenant to this effect is enclosed in the Statement of Consistency enclosed herewith.

The applicant believes that the scale and type of the proposed amenity is appropriate for and directly linked to the local market and the demand profile of the surrounding area.

Current statistics have confirmed that the average household size in Dublin is steadily decreasing. In 2016, the average household size in Dublin (city and suburbs) was 2.73 persons per household. This is down from 2.99 in 1996 and 3.94 in 1971. The proportion of 1 and 2 person households within the Dublin suburban area is also increasing, up from 42.8% in 1996 to 50.8% in 2016^d

The pattern of falling household sizes is set to continue and this is something that must be addressed by the introduction of new housing models. The proportion of adults living alone has also increased between 1996 and 2016 and population of Dublin is further set to expand with a population of 1.60 million expected by 2029.

When this empirical evidence is considered, the rationale for the delivery of BTR development comes to the fore. BTR development is a critical solution to addressing falling household sizes, demographic

^c *Shifting Ownership in Irelands Private Rented Sector' Savills, (December 2017)*

^d *"Demographic Drivers & Changing Housing Demands in Dublin over the coming decade", Future Analytics, February 2019*

change and an increasing population. It is not intended to replace the traditional house ownership model, but provides an attractive option to a certain cohort of the population. The subject BTR proposal is an exceptionally well considered scheme, based on the models of international best practice, with ready access to excellent amenities such as a resident lounge, gyms, reading areas, concierge facilities and immediate access to frequent public transport at the N11.

4.2 BTR Housing and Planning Policy

Recent Planning policy has changed the perspective of how planning and housing delivery must respond to demand and BTR is a key focus of the current national policy mandate.

The National Planning Framework (NPF)

The NPF estimates a need to house one million new people by 2040, focusing development on the top 5 cities, some 50% of that development within Dublin. This new development is to be targeted at brownfield and infill sites first. Sustainable and accessible sites near transport and employment have priority, and new mechanisms such as BTR apartments are a means of achieving this densification.

With regard to rental accommodation, the NPF sets out the following key provision:

*“To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to **build inwards and upwards**, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.*

*This is underpinned by on-going population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a **higher proportion of households in the rented sector** (page 93)”*

A key benefit of BTR development is the potential to accelerate the delivery of new housing at a significantly greater scale than at present. This potential can make a significant contribution to the required increase in housing supply nationally, envisaged by the National Planning Framework.

It is our considered view that the current proposal for 468 build to rent residential units delivers on the vision set out by the National Planning Framework. The site is ideally located to provide an increased scale of development without material negative impacts on established residential areas. The new resident population will have an exceptional level of amenities of site, in addition to easy access to Cornelscourt village and frequent public transport on the N11.

Rebuilding Ireland

Pillar 4 of the Rebuilding Ireland initiative also focuses on the delivery of rental units in Ireland.

The overall vision of Pillar 4 is as follows:

*“Government housing policy aims to ensure that, to the greatest extent possible, every household can access secure, good quality and affordable housing suited to its needs and located within sustainable communities. Within that, our vision is for a strong, **viable and attractive rental sector** supported by a policy and regulatory framework that delivers long term affordable and high quality accommodation solutions meet diverse tenant needs, and a secure, predictable investment environment for landlords and accommodation providers (page 7).”*

*“A very significant proportion of the Rebuilding Ireland target of **delivering 25,000 units of housing supply per annum will need to be provided for in the rental sector**. The traditional dominance of the build to sell model must evolve to provide for increased delivery of housing intended specifically for rental purposes. Our perception of the sector as a short – term tenure option must also evolve. (page 7)”*

Again, the current proposal recognises the requirements of Rebuilding Ireland and the delivery of 468 build to rent residential units, goes a significant way in addressing the demand for 25,000 rental units. There are limited sites in the Dun Laoghaire Rathdown functional area that can accommodate development of the scale proposed in this case. It is critically important that this valuable land is developed to maximise the efficiency of the site and contribute positively to housing supply.

The Apartment Guidelines

The Department of the Environment, published the Apartment Guidelines ‘Sustainable Urban Housing: Design Standards for New Apartments (2018)’, which brought the concept of Build to Rent Accommodation to the fore. As set out in the enclosed *Statement of Consistency*, the Apartment Guidelines (2018) identify a number of key components for this form of housing. These requirements and a detailed compliance response is set out in the enclosed *Statement of Consistency* for review by An Bord Pleanála.

The Dún Laoghaire-Rathdown Development Plan 2016-2022

The Dún Laoghaire-Rathdown Development Plan 2016-2022 recognises that a wider mix of housing and apartment types are required within its functional area with Policy RES7 (*‘Overall Housing Mix’*) stating:

“The provision of a range of housing types and sizes in the County will increase in importance as trends show a decline in family housing and an increase in elderly and single person households. Many of the new households that will form in the County during the period of this Development Plan will be below the current average size and will often consist of one or two persons.”

Due to the acute housing shortage prevailing and the significant demand that exists in the Dún Laoghaire area, the subject lands have been identified as an eminently suitable location for ‘Build-to-Rent’ Accommodation which can provide purpose-built accommodation to meet the housing needs of a greater number of persons.

Policy Summary

Overall, the national policy mandate message is clear. A fully functioning rental market and one that is fit for purposes is a fundamental requirement in addressing current difficulties experienced in the Irish rental Market.

It is submitted that the proposal will make an important contribution in bridging the gap in the 25,000 new rental units envisioned for delivery nationally and will provide for a viable and alternative option to the private rental sector.

Furthermore, and as set out in the enclosed *Statement of Consistency*, recent shifts in planning policy are lending significant weight to higher residential densities and taller buildings at appropriate locations. The opportunity to deliver these requirements and at appropriate locations are rare and must be expedited. The BTR model is considered to be exceptionally well equipped in delivering these requirements and the subject site is considered highly suitable in its location along the N11 for the delivery of this type of accommodation.

In summary, the subject scheme is considered an exceptional opportunity to deliver on national policy requirements and the potential associated with the site; its location; and its ability to deliver a quality build to rent model must be recognised.

4.3 Key Demographics

This section has set out key demographic drivers and changing housing demands in Dublin, which are forecast for the coming decade. This section of the report has been informed by the following reports.

- ‘Demographic Drives and Changing Housing Demands in Dublin Over the Coming Decade’, Future Analytics (February 2019).
- ‘Shifting Ownership in Irelands Private Rented Sector’, Savills, (December 2017).
- ‘Dublin’s PRS Tenant Survey, Knight Frank

Key Points

The following points are notable from the Future Analytics Report entitled ‘Demographic Drives and Changing Housing Demands in Dublin Over the Coming Decade’ (February, 2017)

- Dublin’s population continues to expand robustly. In the ten years to 2016, it grew by 13.5% to 1.35 million.
- There also been a shift in household occupancy and composition within existing and new households. The primary driver of this shift is lower fertility rates. The fertility rate in Ireland and Dublin has dropped significantly over the past 50 years, with the replacement rate now below the rate of two children per woman. This reduction in fertility has decreased the average size of families and as a consequence, the demand for larger unit sizes.
- The average household size in Dublin was 2.73 persons per household in 2016. This is down from 2.99 in 1996 and 3.94 in 1971.
- Occupancy within the housing market also shifted significantly in the last number of years, evidenced by the relative growth of the private rental sector. The lack of housing supply, limited availability of finance for purchases, fall in property prices and increase in the unemployment rate all combined to see a transition away from the well-established owner-occupier market. The private rental sector has grown; increasing from 14.5% of households in 2002 to account for 23.9% of households in 2016. Its absolute growth has been from nearly 55,000 to over 114,000; growth of 109% between 2002 and 2016. Consequently, there is now a greater level of competition amongst those households choosing, or being forced to choose, privately rented housing.
- The proportion of adults living alone in Dublin has increased to 23.9% between 1996 and 2016.
- Dublin’s population is set to continue expanding due to natural growth and net inward migration. In 2018, it is estimated at over 1.38 million. Looking forward, year-on-year rates of growth are expected to pick up and the population is projected to reach 1.50 million by 2024 and 1.60 million by 2029.
- Looking ahead to 2029, the minimum cumulative housing requirement will increase by a further 45,159. The pattern of falling household size requirements will persist and the majority of this demand will be for 1-and 2-person households which will account for 31,816 or 70.5% of preferences. The annual requirement for completed units will be on average around 11,035 per year to meet the minimum requirements of Dublin’s population over the coming decade.
- It is critically important that the construction of new housing reflects the altered demographics and housing supply must shift from traditional 2 storey houses to apartment units that meet demand.

It is evident from the above statistics that the average household size in Dublin is steadily decreasing. The pattern of falling households sizes is also set to continue and this is something that must be addressed by the introduction of new housing models. The proportion of adults living alone has also increased between 1996 and 2016 and population of Dublin is further set to expand with a population of 1.60 million expected by 2029.

We also refer to the Savill’s publication ‘Shifting Ownership in Irelands Private Rented Sector’ (December 2017), which sets out that 18.9% of Irelands population currently lives in private rented accommodation. The percentage of people living in rented accommodation in Dublin however, remains higher than the nationwide percentage at 24.3% compared to 16.8% outside Dublin. The conclusions drawn from this report suggest that all of the empirical data shows that Irelands private rented sector is expanding with the number of households in the private rented sector rising 3.2% in the last year.

We also refer to the publication from Knight Frank entitled ‘Dublins PRS Tenant Survey’ which confirms that tenants consider a number of factors when choosing a location for renting. 39% of tenants surveyed identified that the most important factor is ability to get to work. 29% of renters identified that affordability was key; with 21% identifying that the rental accommodation must be close to public transport.

It is in consideration of the above statistics that the delivery of BTR development comes to the fore. BTR development is a critical solution to addressing falling household sizes and an increasing population. The subject BTR proposal is a high quality design with ready access to amenities such as resident loungers, gyms, reading areas, concierge facilities and also has good quality access to public transport at the N11. Furthermore, the model proposed is well placed in the market in terms of ability to get to work; access to public transport and will be affordable. These are fundamental requirements for the success of the BTR model. The quality of the development delivered is exceptional, meeting standard apartment requirements with the benefit of first class residential tenant amenities.

It is submitted that the demographic analysis for the Dublin area robustly supports the provision of Build to Rent development and it is in considering the trends set out above that the current concept should be positively considered.

4.4 The Local Rental Market

The applicant has also considered the local rental market in review of the principle of BTR development and delivery of same at Cornelscourt.

The Rental Market

In a search carried out on 26 September 2019 on Daft.ie, only 34 no. properties to rent were recorded to be available in the areas of Cabinteely, Foxrock, Deansgrange and Stillorgan. Only 3 of these properties were 1 bedroom or studio units. This indicates a significant shortage of smaller rental properties available in the area, which is hugely problematic in addressing current local demand.

Affordability

We also refer to the Daft.ie quarterly reports on the rental and property market. In the second quarter of 2019 (report dated 22 August 2019), rents in the South County Dublin region averaged at €2,206 - the nationwide average being €1,391. The South County Dublin Region had the single highest rental rate nationwide, which confirms a significant shortage in supply of rental accommodation in the area.

The table below details average rents in Dublin 18 per unit type per month are:

1 Bed	2 Bed	3 Bed	4 Bed	5 Bed
€1,626	€1,871	€2,168	€2,387	€2,521

Table 1 - Average Dublin 18 Rents

Additionally, average rents for single beds and double beds in South County Dublin in traditional shared housing, per month are as follows:

Single Room	Double Room
€603	€723

Table 2 - Average Rents for Single and Double Beds

As highlighted above, an average 1 bedroom apartment in the Dublin 18 area cost €1,626 to rent per month. A key affordability indicator or crisis occurs when a person is required to spend more than 30% of their salary on rent. Taking these figures, and using a net salary multiplier, an annual salary of c.€65,000 would be required to service monthly rental repayments for a 1-bed unit in this area, at crisis level.

This is clearly well in excess of the national average salary which currently stands at approximately €45,000. Using these statistics alone there are no affordable accommodation options in this area for the average single income family or single persons seeking standard tenancies.

The current proposal for BTR development aims to address the affordability issue by adding to the market a significant influx of rental accommodation for the Cornelscourt area, which in turn will have a significant impact on the rental prices sought. The current proposal will also much sought after rental accommodation and aims to address the existing deficit in rental properties that exists in the immediate locality. The rental units proposed have the benefit of a superb range of residential tenant amenity facilities; unrivalled access to the N11 public transport corridor; and has exceptional access to Cornelscourt Neighbourhood Centre. Sites of this nature are rare and appropriate residential densities, heights, and unit typologies such as that proposed must be supported.

4.5 Suitability of the Site for BTR Development

The following section sets out a number of key points in support of the principle of BTR development at the subject site based on (a) site location and access public transport accessibility and (b) the proximity of the site to local employment centres.

Site Location and Access to Public Transport

The following points set out the exceptional levels of public transport and proposed public transport options available to the subject site:

- The site is directly bounded by the N11 Quality Bus Corridor or Bus Priority route with bus services to the City Centre running every 6 minutes on average. Dublin City Centre can be accessed from the site with a journey time between 40 – 50 minutes. Dún Laoghaire and Bray are equally accessible by bus with journey times of approximately 25 minutes. The site is also serviced by Go Ahead Bus Services and has 2 night link services. Links are also provided to Dublin Airport via a Bus Eireann route and Aircoach bus accessible to the site.
- With regard to bus connects, the proposed development will be located in close proximity to a branch of a key bus “spine” where a bus frequency of every 5 minutes or better can be expected. The proposed development will be served by the proposed E spine, where a bus frequent of 5minutes or better can be expected. The E1 branch of the network will be directly accessible to the site via a new cycle connection along the northern boundary of the site.
- The nearest LUAS stop is located at Carrickmines Park & Ride (c. 1.8km), which has the benefit of a Park and Ride. The site is located within the catchment area for additional development contributions payable for the extension of the LUAS to Cherrywood. The LUAS Greenline provides access to Sandyford, Dundrum and the City Centre in addition to other destinations. The subject site will also benefit from the improved connectivity through

the LUAS Cross City service, providing connections to Dublin City Centre North, Phibsborough and Broombridge.

- The N11 route also features dedicated cycle tracks connecting to the wider cycle network throughout the county and the current proposal delivers a direct connection to the N11.

As set out in the enclosed DBFL material, the site lies within the 'Dublin South East Sector' as outlined in the Greater Dublin Area Cycle Network Plan (2013). Within the Dublin South East Sector, there are additional cycling proposals within the vicinity of the site, which include a route from 'St. Stephen's Green to the Dublin South Sector East area' (Primary Route 12/12A); a route from 'Dun Laoghaire to Tallaght' (Secondary Route SO6); and a route from 'Sandyford to Shanganagh' (Carrickmines Greenway).

- According to current proposals by the NTA & TII, the proposed Metro Link will operate from Charlemont, immediately south of the Grand Canal, and will provide links to City Centre locations and Dublin Airport, terminating in Swords.
- Residents of the Cornelscourt development will be able to avail of the proposed Metro Line through the Luas Green Line Stop, Carrickmines, and interchange at the Charlemont Luas Stop to access the underground metro.
- Aside from public transport facilities, The DBFL Traffic and Transport Report submitted herewith also confirms that traffic generated from the site will not cause excessive delays or queuing nor will junction capacity issues arise as a result of the proposals. Analysis shows that all junctions operate within capacity for the Horizon design year of 2036.

It is concluded within this document that there is a significant opportunity associated with the site in terms of transport and traffic to favorably consider residential development at the subject site.

We refer to the enclosed detailed traffic and transport analysis prepared by DBFL Consulting Engineers for further details on matters of traffic and transport.

Local Employment Centres

The following points are considered relevant for consideration in terms of the proximity of the site to local employment centres:

- The site is considered a valuable infill location along the N11 bus priority route, which will provide for rapid transit to **City Centre Employment Centres**.
- The site is within easy commuting distance of major employment centres in **Sandyford and South County Business Park**. By way of example, we note the significant scale of major employers in these areas as provided by Knight Frank:

Company	Total m2	Building Location
Microsoft	27, 871	One Microsoft Place, South County
Vodafone	24,433	Block E, Central Park
Google	16,371	Block I, Central Park
Facebook	16,165	Nova Atria, Sandyford
Icon plc	15,794	South County
AIB	14,701	Block H, Central Park
Salesforce	13,366	Building G, Central Park
Fleetmatics	8,353	Nova Atria, Sandyford
SSE Airtricity	7,759	Red Oak South, South County
Bank of America	7,060	Building D, Central Park
Ulster Bank	7,060	Building B, Central Park

Table 3 - Employers in Sandyford and South County Business Park

- **Cornelscourt District Centre** is located c. 270m to the south east of the site and comprises a Dunnes Stores and a number of smaller comparison shops. The Shopping Centre has a significant employment base and services the local community in terms of convenience and comparison goods.
- **Deansgrange Business Park** is located c. 1.3km to the north west of the site and includes businesses such as Baxter Healthcare Limited, Nutricia Ireland, Local NCT Centre and a range of other businesses.
- **Dun Laoghaire Industrial Estate** is also located c. 500m from the subject site at Pottery Road. The estate contains a range of businesses and a Lidl.
- **The Dun Laoghaire Institute of Art, Design and Technology** is located 1.5km to the north west of the site. This institute is the only one of its kind in Ireland with a specific focus on the creative, cultural and technological sectors. The institute is currently home to 2000 students.
- **University College Dublin** is located 5km to the north west of the site and is a 15minute bus ride from the site along the N11. The University is home to nearly c. 34,000 students and has a staff base of c. 3,400 persons. The site at Cornelscourt is opportunely situated on the N11 and is a short 15minute bus journey to the University.
- The **National Rehabilitation Hospital** is located 1km to the north west of the site and provides for a comprehensive range of specialist rehabilitation services to patients throughout Ireland, who as a result of an accident, illness or injury have acquired a physical or cognitive disability and require specialist rehabilitation. The hospital employs a significant number of healthcare professionals and administrative staff and is considered a significant employment centre in the local area and one, which is proximate to the subject site.
- The site is also located proximate to a number of village and town centre services at **Cornelscourt neighbourhood centre**.

Figure 4 below demonstrates the proximity of subject site to local employment centres.

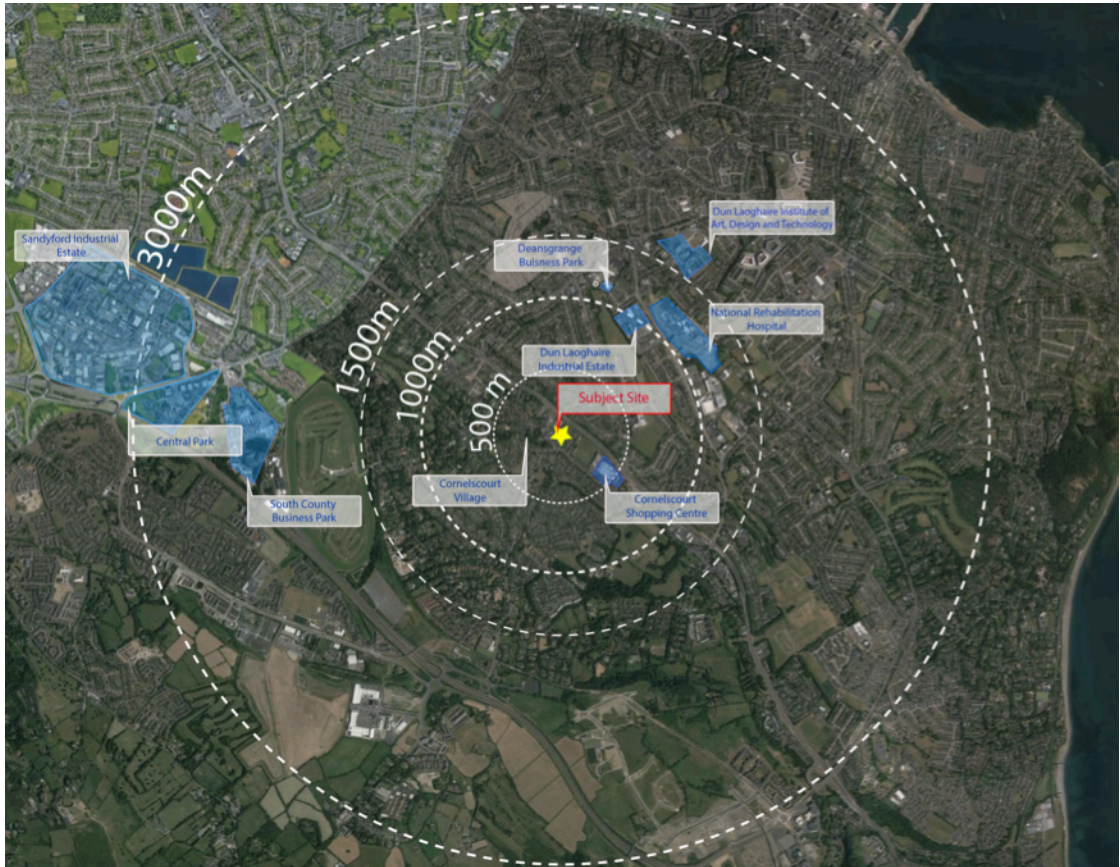


Figure 4 - Distances from Site to Key Employment Hubs

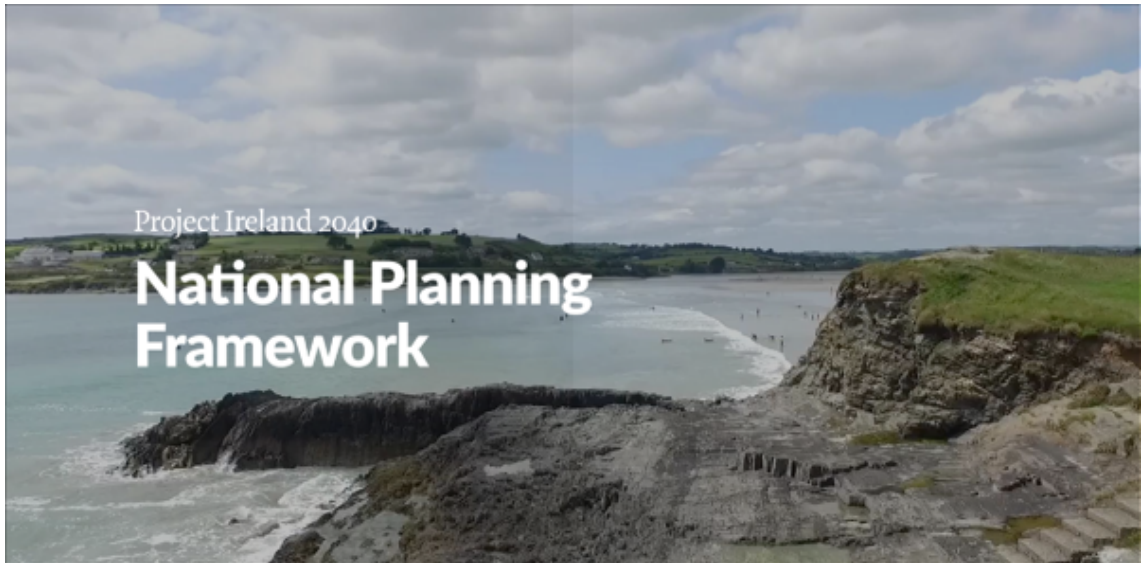
Having considered the above, it is our considered view that the site location in terms of accessibility to existing and future transport nodes and local and city centre employment areas warrants the site a suitable location for the BTR development principle.

The delivery of a BTR proposal at this location is supported on the basis of the locational advantage of the site including its position relative to major employment centres in the surrounding area and the accessibility of the site along the N11 Bus Priority Route, which serves the city centre and beyond.

We trust that due consideration will be given to the suitability of the current site for BTR development and that the unique opportunity associated with the site for this form of development will be recognised.

5 NATIONAL POLICY CONTEXT

5.1 Project Ireland - National Planning Framework (2040)



The National Planning Framework (NPF) is the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new greenfield sites for housing and particularly those close to public transport corridors is key to enabling growth. The current BTR proposal delivers on this requirement.

A key benefit of BTR concept and the current proposal is the potential to accelerate the delivery of new housing at a significantly greater scale than at present. This potential can make a significant contribution to the required increase in housing supply nationally, envisaged by the National Planning Framework.

Compliance with Key National Policy Objectives

The following policies are considered key in the context of this site:

National Policy Objective 1b -

“Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e. a population of around 2.85 million;”

National Policy Objective 2a -

“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”

National Policy Objective 3a -

“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”

National Policy Objective 3b -

“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.”

National Policy Objective 4 -

“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”

National Policy Objective 6 -

“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”

National Policy Objective 11 -

“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”

National Policy Objective 13 -

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”

National Policy Objective 32 -

“To target the delivery of 550,000 additional households to 2040.”

National Policy Objective 33 -

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

National Policy Objective 34 -

“Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.”

National Policy Objective 35 -

“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”

It is our considered view that the current proposal complies with and exceeds the vision of the National Planning Framework on the following basis:

- The site is a key suburban greenfield site and one that is wholly appropriate for increased residential density, height and scale. This is particularly the case given proximity to public transport nodes. Most notably, the site is located adjacent to an existing Bus Priority Route along the N11 and ancillary bus routes along Old Bray Road. The site is also located in proximity to the Green Luas Line (1.8km) and the DART service (4.5km). The site is therefore well placed in terms of exceptional public transport accessibility.
- The site is a large currently unused greenfield site in the heart of Cornelscourt Neighbourhood Centre and is one of the last remaining development sites along the N11. The current site is underutilised and the development now proposed will ensure a cohesive and efficient use of well serviced greenfield land delivering on increased heights and density at a sustainable location.
- BTR developments can provide a viable long-term housing solution to households where home-ownership may not be a priority, such young professionals or those wishing to downsize. It is submitted that this offer will deliver on a number of the NPF objectives set out above and primarily those directed at the rental sector.

- The proposal has the potential to deliver 468 residential rental units, which will be a significant addition to the local rental market and housing offer in area. As set out in Section 4 of this report, the current demographic shift is decreasing household sizes and increasing levels of adults living alone. The nature of the residential units now proposed have responded to these demographics. The units also have the potential for adaptability after 15 years if so required and will go a significant way in achieving the housing targets set out by the NPF.
- The proposal delivers on reduced car dependency with a ratio of 0.58 car parking spaces per unit proposed. This is a sustainable approach to car parking provision at a key suburban infill site. This provision is supported on the basis of the location of the site adjacent to the N11 corridor; the nature of the proposal as BTR; the significant precedent offered by permitted BTR schemes; and the current national policy mandate to reduce the level and provision of car parking at central and accessible urban locations.

Having considered the above, it is submitted that the proposal for 468 new build to rent residential units, a café/restaurant and residential amenity facility will deliver on key objectives contained within the NPF. The site is also zoned for residential development and is serviced with appropriate infrastructure to deliver on a sustainable residential development in close proximity to the Neighbourhood centre and public transport nodes.

5.2 Rebuilding Ireland: Action Plan for Housing and Homelessness



The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 468 rental units at a key location along the N11. The proposal for Build to Rent Accommodation will provide alternative, affordable residential accommodation in an area of high demand. The site has the benefit of accessibility to both Luas and Bus public transport services and is considered a significant opportunity site for the delivery of residential units.

Pillar 4 of the Rebuilding Ireland initiative focuses on the delivery of rental units in Ireland.

The overall vision of Pillar 4 is as follows:

“Government housing policy aims to ensure that, to the greatest extent possible, every household can access secure, good quality and affordable housing suited to its needs and located within sustainable communities. Within that, our vision is for a strong, viable and attractive rental sector supported by a policy and regulatory framework that delivers long term affordable and high quality accommodation solutions meet diverse tenant needs, and a secure, predictable investment environment for landlords and accommodation providers (page 7 Pillar 4)”

It is further stated that *“The traditional dominance of the build to sell model must evolve to provide for increased delivery of housing intended specifically for rental purposes. Our perception of the section as a short – term tenure option must also evolve (page 7 Pillar 4)”*

It is considered that the current proposal is a significant move forward within the Dun Laoghaire Rathdown Area in terms of the delivery of accommodation in that to date, only 1 application for Build to Rent Accommodation has received permission within the Strategic Housing Development process in this locality. We reiterate at this point that the current proposal has been delivered as a direct response to local demographic trends in the area, which confirms that there are decreasing household sizes, a trend that is set to continue.

5.3 Regional Spatial and Economic Strategy



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* has recently been published and adopted.

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area as set out below:



Figure 5 - Dublin City and Suburbs

The Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities.”

“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and

active travel and the development of strategic amenities to provide for sustainable communities. In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 229 units per ha (site area of 2.14 ha and 468 residential units proposed) and has had regard specifically to standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for Planning Authorities (2018)’ and ‘Urban Development and Building Heights Guidelines for Planning Authorities (2018)’ in ascertaining an appropriate residential density, height and car parking provision for the site.
- The scheme delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor.
- The scheme utilises a key greenfield site on a prime suburban site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this built up area of Dublin.

5.4 National Policy Summary

The National Planning Framework signals a shift in Government policy towards securing more compact and sustainable urban development, which requires at least half of new homes within Ireland’s cities to be provided within the existing urban envelope. A significant and sustained increase in housing output and apartment style development is therefore necessary to support government policy.

The delivery of residential development in a compact form on this prime infill, underutilised site, comprising well designed units is wholly consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

6 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the site subject of this planning application is set out below.

We note the planning history mapping of the site and its surrounds as follows:



Figure 6 - Planning History of Main Development Site and surrounding lands

The key applications of relevance (the subject site and AIB lands to the north) are summarised in brief below.

6.1 Subject Site

The planning history associated with the site relates to 1 planning application and 1 vacant site levy entry. This history is set out in brief below.

1. Reg. Ref: D17A/0597 & ABP 301315-18

Retention permission was granted for a temporary car park for retail staff and construction staff associated with the on-going retail operation at Dunnes. This application was the subject of an appeal to An Bord Pleanala. The application was withdrawn in July 2018.

2. VS - 0011 & PL06D.301161

An Bord Pleanala confirmed the entry of the subject lands on the Vacant Sites Register. The Bord noted that the majority of the site was and is vacant or idle, there is a need for housing in the area, the site is suitable for the provision of housing as demonstrated by the residential land use zoning for the area, and that insufficient reason is put forward to cancel the entry on the Vacant Sites Register.

Evidently, the site is currently subject to a vacant site levy. There is clear direction from An Bord Pleanála under the above assessment that there is a need for housing in the area and that the site is suitable for the provision of housing as demonstrated by the residential land use zoning for the site.

6.2 AIB Bank Site

The following 4 applications are considered relevant to the AIB site to the north of the site.

1. Reg Ref: D04A/1285

Permission was refused for the demolition of existing single storey circular bank building on existing site and (2) erection of new 3 storey 1,595 sq metres branch bank building comprising of banking hall/offices and ancillary accommodation, parking, signage and site development works. The reason for refusal was as follows;

‘having regard to the prominent location of the site within a Neighbourhood Centre Zone and to the proposed site layout and orientation of the proposed building, it is considered that the proposed development, by reason of its location within the site, orientation toward the N11 and Old Bray Road only, design and height, would have an adverse impact on the existing Cornelscourt Village by virtue of it being seriously injurious to the visual amenity of the area low site coverage and plot ratio, underutilisation of the site and lack of integration with the existing streetscape’

There was no appeal on this file.

2. Reg Ref: D05A/0559

Permission was granted for the demolition of existing single storey, circular bank building on existing site and (2) erection of new 3 storey, 1,639 sq m branch bank building comprising of banking hall/office and ancillary accommodation, parking, signage and site development works, subject to 17 conditions.

There was no appeal on this file.

3. Reg. Ref: D08A/0703

Permission was refused for a development consisting the following description:

“The development, with a gross floor space of 10,268sq.m approximately (over a single basement level of 2,674sq.m approximately), will range in height from five to eight storeys, and comprise 82 no. residential units (including balconies) (comprising 14 no. 1 bedroom apartments; 56 no. 2 bedroom apartments and 12 no. 3 bedroom apartments) consisting of 7,172 sq.m of residential accommodation 156 sq.m of crèche accommodation (with associated outdoor play area comprising 155 sq.m); and a single level basement, including 134 no. car parking spaces (including stackers) (of which 43 no. are replacement car parking spaces); 86 no. cycle parking spaces; ancillary plant and associated switchrooms; waste management and storage areas. The development will also include: the provision of 7 no. surface car parking spaces, roof terraces, street furniture, the provision of diversion and connection into existing services as required; boundary treatments, lighting, attenuation, all hard and soft landscaping changes in level, and all associated site development site excavation works above and below ground. Vehicular and pedestrian access to the proposed development will be provided via an existing access road, off the Old Bray Road.”

Permission was refused for the following reasons:

Reason 1: *‘Given that the proposed development occupies a very prominent site overlooking the N11, the Planning Authority considers that a high quality, imaginative and site specific design,*

which relates well with existing developments and has due regard to the overall context at this location, would be required to successfully accommodate a new development into the existing streetscape without adversely impacting on existing visual amenities and the character of this area.... would be out of character with the existing streetscape and thereby have an adverse and injurious impact on the visual amenities of the streetscape at this location'

Reason 2: *'Scale, bulk and poor mix of proposed uses would be out of context with and would relate poorly both visually and functionally to the existing neighbourhood centre at this location.*

Reason 3: *'With regard to the layout and provision of open space, serious concerns exist that the proposed layout does not afford adequate useful open amenity area. Serious concerns also exist regarding the lack of adequate play / amenity facilities for children within the overall proposal'*

Reason 4: *'Having regard to the proposed building's proximity to the eastern / south eastern site boundary and taking into account the extensive balconies and windows over five stories on this elevation, serious concerns exist that the proposal would have a seriously injurious impact on the amenities of adjacent property to the east and south east and would seriously compromise any future development proposals for these lands, which are zoned for the protection of residential amenity under the current County Development Plan'*

There was no appeal on this file.

4. Reg. Ref: D09A/0295 & PL06D.234337

Permission was refused for development at this 0.62 ha approximately, at Old Bray Road, Foxrock, Co. Dublin. The development, with a gross floor space of 6,812sqm approximately (over a single basement level of 2,735 sqm approximately) will range in height from five to six storeys, and comprise 55 no. residential units (including balconies and roof gardens) (comprising 15 no. 1 bedroom apartments; 33 no. 2 bedroom apartments and 7 no. 3 bedroom apartments) consisting of 5,254sqm of residential accommodation; 205sqm of crèche accommodation (with associated outdoor play area); 756sqm of local retail and retail services accommodation; 469 sqm of office accommodation; 128sqm of cafe accommodation and a single level basement, including 122 no. car parking spaces. Vehicular and pedestrian access to the proposed development will be provided via existing access road, off the Old Bray Road.

Reason 1: *'it is considered that the proposed development, by reason of its scale and massing, constitutes overdevelopment of the site, fails to adequately respond to its context or integrate successfully with its immediate and surrounding built environment and as such, would be seriously injurious to the amenity of property in the area'*

Reason 2: *'it is considered that the proposed development fails to provide a coherent link or high quality addition to Cornelscourt Village, in terms of building form and pedestrian permeability, and as such contravenes the land use zoning objective 'to protect and provide for neighbourhood centre facilities'.*

This was appealed to the bord and later refused for the following reason;

'Having regard to the massing and scale of the proposed development on a site located on the edge of Cornelscourt Village, to the provisions of the Dun Laoghaire Rathdown County Development Plan 2004 – 2010 including the sites Neighbourhood Centre Zoning and to the existing pattern of development in the area, it is considered that the proposed development would constitute overdevelopment of the site, would fail to adequately respond to its context or integrate successfully with its immediate and surrounding built environment and as such, would seriously injure the amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area'

6.3 Precedent Development along the N11

We note that An Bord Pleanála has recently permitted Strategic Housing Developments of significant scale along the N11 corridor:

Roselawn/Aberdour

An Bord Pleanála granted permission for 142no. Build to Rent units permitted in a 5 to 7 storey residential scheme on 11 July 2019.



Figure 7 - View of Roselawn/Aberdour Development (source: Architect's Design Statement)

Blakes Site

An Bord Pleanála granted permission for 103 residential units, 179 student accommodation units and ancillary mixed use spaces on 16 March 2018.



Figure 8 - Aerial view of Blakes Site (Source: Architect's Design Statement)

It is therefore evident that the Board recognises the strategic importance of the N11 corridor and is permitting developments of significant scale along the route, in accordance with national planning policy.

6.4 Statutory Notice Check

Section 17 of the Planning Application Form sets out a requirement to consider the following vis a vis the subject site:

Do any statutory notices (e.g. Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?

We note that there are no notices of immediate relevance to the subject site.

Fire Safety Certificate

No records on site.

Enforcement

No records on site.

Dangerous Buildings

No records on site.

Derelict Site

No records on site.

Building Control

No records on site.

Vacant Site Register

Reference - VS - 0011 & PL06D.301161

The site is currently on the Vacant Sites Register.

Under the above file, An Bord Pleanála noted that the majority of the site was and is vacant or idle, there is a need for housing in the area, the site is suitable for the provision of housing as demonstrated by the residential land use zoning for the area, and that insufficient reason is put forward to cancel the entry on the Vacant Sites Register.

7 SECTION 247 - PRE-PLANNING

The evolution of the scheme and brief details on the level of engagement with the Planning Authority are summarised below. We can also confirm that formal Section 247 meeting minutes (DLR Minutes) and any formal correspondence between the design team and various departments are enclosed with this pre-planning application report (as an appendix herewith) for information purposes.

All matters raised by the Planning Authority have, where possible, been addressed throughout the documentation now submitted. It is important to note that where the applicant has deviated in terms of a difference of opinion with the Planning Authority, there is a clear rationale in support of the scheme in terms of its strong footing in national policy and ministerial guidelines.

7.1 Pre-Planning Meeting

A formal pre-planning meeting was scheduled for 27 February 2019 to discuss the proposal in principle. Each of the points raised by the Planning Authority followed by the applicant response is set out below in Table 3.

Item	Planning Authority Discussion Point	Applicant Response
Planning		
1.	View from Cabinteely Park and the Protected Structure should be included.	A full selection of views are included in the pack enclosed from Modelworks. 33 views have been prepared in total. Views 32 and 33 identified the views from Cabinteely Park and the protected structure, namely Cabinteely House.
2.	Preference for distinct routes through apartment Blocks D, E and F.	There are now distinct routes delivered through Blocks D, E and F. New permeable links either side of these blocks delivery connectivity within the scheme. We refer to the input from Cameo and HJL for further details on the permeability of these blocks.
3.	Vitality and interface with the village welcomed. Coffee shop element accepted. Reservation on the nature of gym use not creating activity and not contributing to the streetscape.	<p>The scheme delivers active street frontage along the village entrance to the site. The delivery of a café/restaurant use with direct frontage onto Old Bray Road which creates a continuous street frontage at this location.</p> <p>A gym facility of 63 sq m has been located centrally within the scheme to ensure that all residents have access to same. The gym facility is delivered as part of residential tenant amenity facilities and is a welcome addition to the services offered.</p>
4.	Separation Distance to the N11 questioned. Noise mitigation required.	<p>Separation distances to the N11 are now detailed on material submitted from Henry J Lyons. We note specifically that blocks are located within 5.9m and 8.1m of the shared boundary with the N11.</p> <p>Distances to the N11 itself are identified as 7.9m and 8.2m as set out in Henry J Lyons material submitted herewith.</p> <p>We can confirm that a full noise impact assessment has been prepared as part of the EIAR submitted herewith. Details on noise mitigation are detailed. At operational stage, mitigation measures include glazing and ventilation that achieves the minimum sound insulation performance criteria.</p>

5.	Preference for pedestrian/cyclist connection to Willow Grove.	A pedestrian / cyclist connection to Willow Grove has been facilitated within the current proposal. We can also confirm that these lands at Willow Grove are taken in charge by Dun Laoghaire Rathdown County Council (as per correspondence enclosed with this planning application – Appendix 2 refers).
6.	Unsatisfactory relationship of Blocks D, E and F to the cottages on the Old Bray Road. Open space backing onto these units was considered dead spaces with no activity. Consider maisonette units along the boundary.	<p>Bungalow units have been introduced to the development layout along the Old Bray Road Boundary. The introduction of these units provides coherence in integration with existing cottages along the Old Bray Road. Most notably, the existing scale of the cottages is maintained within the site by way of the bungalow units. This design allows for a stepped transition to taller elements of Block E.</p> <p>A new landscape layout has also been delivered for the site as created by Cameo and Partners. The focus here is on a quality landscape proposed with exceptional open space quantum's. We refer to Section 9 of this report for further detail on proposals.</p>
7.	Concern over urban nature of the proposal and that this may not reflect the character of Cornelscourt. More suited to a Sandyford Typology.	<p>The concerns raised by the Planning Authority in relation to the urban nature of the proposal are rejected. Rather and to the contrary, the current proposal aims to bridge the gap between the unsustainable low density character of the immediate area at Cornelscourt, whilst delivering on an appropriate residential and height strategy throughout the site. The proposal has been tested in relation to wind and microclimate, daylight and sunlight and visual impact and is considered exceptional in design in response to local context and character.</p> <p>Sites of this nature are rare and appropriate residential densities, heights and unit typologies, such as that proposed must be supported. There is a clear national policy mandate for higher residential development at appropriate locations and this approach much be expedited especially in cases where there are no impacts on local residential amenity etc.</p>
8.	Commercial drivers for current Build to Rent scheme set out by the applicant.	Section 4 of this report has set out detailed analysis on the Build to Rent concept and model and the commercial thinking behind the proposal for BTR provision. Specifically and in summary, the proximity of the site to public transport coupled with demographic trends in the area have all informed the current proposal for BTR accommodation.
9.	Dual aspect ratio should be improved, and the extent of long corridors was a concern. DLR suggested that there would be security concerns with these blocks and that there was a requirement for a break in the corridors.	<p>A Dual Aspect of 55.3% is proposed across the entire scheme (houses and apartments). For the 452 apartment units proposed, a dual aspect of 51.9% is achieved. This is an exceptionally high percentage for a build to rent scheme and exceeds Apartment Guideline requirements.</p> <p>The Project Architects have carefully designed the corridor routes through the buildings to provide large break out spaces for residents and provide visual permeability throughout the scheme for the residents and wider context. Each apartment building is accessed via these break out spaces; containing vertical circulation to all private residential floors in a secure and efficient</p>

		manner. The layouts of these break out spaces are design in line with best practice examples.
10.	Case for height proposed should be considered vis a vis national policy.	<p>The heights proposed in this case are wholly consistent with the national policy, which requires increased densities and height to be delivered along key transport corridors.</p> <p>We refer An Bord Pleanala to the enclosed 'Building Height Report' prepared by Henry J Lyons, which set out how the proposal has been considered vis a vis national policy.</p>
11.	Childcare Assessment and no provision for a creche facility was not accepted.	The rationale for not providing a creche facility has been set out in detail in the enclosed Community Infrastructure Statement. The nature of the development and the provision of mostly studio, 1 and 2 bed units, coupled with a detailed analysis on capacity within existing facilities in the area does not warrant the provision of a creche facility in this case.
12.	Community Infrastructure and School Assessment Statement would be required.	A Community Infrastructure Statement is now submitted herewith for consideration.
13.	Discussion on how the relationship to the cottages could be resolved.	The material enclosed herewith sets out the proposed relationship between the development and the cottages. Notably, bungalow style units are proposed along this boundary to deliver a transition in scale between these smaller units and the proposed apartment blocks. We refer to the design statement prepared by Henry J Lyons on this matter.
14.	Direct connection to the village would be welcomed.	<p>Appropriate permeability and connections to the village centre are delivered where appropriate and on lands within the applicant's control. We note specifically that a pedestrian /cyclist connection to the village is delivered along the entrance to the site, which ensures connectivity with the neighbourhood centre. A further pedestrian link is facilitated to Willow Grove and a pedestrian/cyclist connection to N11, which are considered significant planning gains in terms of delivering permeability to the wider area.</p> <p>The applicant does not control any additional property in the vicinity of the site to deliver on any additional permeability linkages. However, the applicant remains committed to exploring future links with the village to the south east of the site.</p>
15.	Vacant Site Levy and the strict programme that the team are working to was set out.	The site current features on the vacant sites register and the delivery of residential accommodation at this location is now a critical requirement.
Roads		
16.	Safety concerns raised regarding traffic speeds, desire lines and flow of pedestrians/cyclists.	<p>Matters of traffic are set out in accompanying documentation from DBFL Consulting Engineers.</p> <p>We note the following points in summary:</p>
17.	A ratio of 1:1 for car parking was the preference. Rationale for 0.6 was not accepted. Strong evidence based	DBFL have considered all safety concerns raised regarding traffic speeds, desire lines and flow of pedestrians and cyclists and documented response

	argument for any reduction in car parking is required.	pieces are enclosed herewith. A quality audit has been carried out and a DMURs strategy has been prepared to address the items referenced.
18.	BTR scheme would be covered by a covenant and specific mobility management measures could be included i.e. Go Car, Bleeper bikes.	The rationale for a car parking ratio of 0.58 spaces per unit has been set out in the enclosed Traffic and Transport Assessment Report from DBFL Consulting Engineers. This is based on a provision of 274 spaces for 468 residential units. We note that the ratio proposed is considered more than appropriate for the site in the context of:
19.	Bicycle maintenance space could be included in the scheme.	<ul style="list-style-type: none"> ⇒ the location adjacent to the N11 corridor ⇒ the BTR nature of the scheme; ⇒ the significant precedent offered by permitted BTR schemes ⇒ the national policy mandate to reduce the level and provision of car parking at central and accessible urban locations. <p>Precedent in support of the car parking ratio is set out further in this report and in the enclosed DBFL material.</p> <p>The traffic and transport inputs from DBFL confirm that the proposed development will use Go Car. Specifically, it is proposed that 9-11 spaces will be allocated for car sharing (5 will be dedicated to Go Car and a further 4-6 spaces will be dedicated to the developments own car share club).</p> <p>The support of bleeper bikes has also been confirmed for the proposal and we refer to the enclosed letter of support from Bleeper Bike in Appendix</p> <p>The design architects have also made provision for bicycle maintenance space at bicycle storage locations within the scheme.</p>
Drainage		
20.	Solar panels and green roof areas were acceptable though the depth of the sedum roof should be the max possible.	Final details on the green roofs proposed and enclosed in the input from Cameo & Partners. The soft landscaping strategy set out in the design and access report sets out the detail on green roofs. Drawings C0098 L122 also sets out the location of the green roofs proposed.
General		
21.	Further design work required. Open space and block layout requires further justification.	Detailed design justification is set out in the design statement prepared by Henry J Lyons. Furthermore, a design and access statement has been prepared by Cameo, which sets out in detail the details of open space provision within the scheme.
22.	Planning Authority would prefer another meeting prior to ABP stage.	The applicant proposed a follow up meeting with the Planning Authority but were advised to proceed to pre-planning with An Bord Pleanala, where there were detailed discussions held between the Applicant, Planning Authority and An Bord Pleanala.

Table 4 - Planning Authority Meeting Comments and Applicant Response

8 STRATEGIC HOUSING DEVELOPMENT - PRE - PLANNING REQUEST

On 10 June 2019, a formal Strategic Housing Development pre-planning request was lodged with An Bord Pleanala. Reg. Ref. ABP- 304647-19 refers.

A comprehensive pre-planning application was lodged with An Bord Pleanala setting out the basis on which the pre-planning request could be favorably considered.

8.1 Planning Authority Opinion

As part of this pre-planning process, Dun Laoghaire Rathdown County Council issued a formal opinion on the proposal, which was dated 04 July 2019.

For the purpose of this report, the DLR planning opinion piece followed by the applicant response is outlined in brief below. The response items are largely informed by detailed included in the planning application material enclosed herewith.

Item	Planning Authority Discussion Point	Applicant Response
1.	The development should be shown to robustly comply with the Urban Development and Height Guidelines for Planning Authorities 2018.	We refer to the enclosed Height Report jointly prepared by Henry J Lyons and Brock McClure for further detail on the performance of the proposed heights vis a vis the detail contained within the Urban Development and Height Guidelines for Planning Authorities 2018.
2.	All relevant SPPRs of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) should apply. Notwithstanding, the Planning Authority has concerns in relation to the proposed development in terms of the dominance of studio and one-bed units, the dominant number of single aspect units and the length of internal corridors.	We refer to the enclosed Housing Quality Assessment Report prepared by Henry J Lyons and Brock McClure, which sets out the performance of the proposed apartments vis a vis the detail contained within the Apartment Guidelines 2018. We also refer to the detailed Statement of Consistency prepared by Brock McClure, which provides detailed analysis of the performance of the scheme vis a vis all SPPRs contained within the Apartment Guidelines.
3.	An Bord Pleanala should be satisfied that the proposed development appropriately ties into the existing fabric and urban grain of the Cornelscourt area. A report that specifically addresses the proposed materials and finishes to the scheme and which also seeks to create a distinctive character for the development may be appropriate in this regard.	We refer to the enclosed Design Statement prepared by Henry J Lyons, which sets out the high quality materials and finishes proposed for the scheme.
4.	The Planning Authority has concern in relation to the quantity and quality of public open space provision and this should be robustly justified.	We refer to the enclosed Design and Access Statement prepared by Cameo & Partners, which sets out a revised high quality landscape plan for consideration. Cameo & Partners were appointed post pre-planning stage with An Bord Pleanala and have delivered an exceptional landscape masterplan to serve the development.
5.	The Planning Authority does not support the absence of a childcare facility for a development of this scale.	We refer to the enclosed Community Infrastructure Statement enclosed herewith, which sets out detailed rationale for the absence of a childcare facility. We note that the BTR nature

		of the scheme coupled with demographics and existing capacity in the area confirms that a creche facility is not required for this development.
6.	The Daylight, Sunlight and Overshadowing Study document is noted. All drawings contained within this document are very small and are very difficult to read. The document pays very limited attention to daylight and sunlight analysis of the amenity area within the proposed development itself and it should be clearly demonstrated that adequate daylight and sunlight is provided to proposed open space amenity areas.	We refer to Chapter 17 of the EIAR enclosed herewith. This chapter includes clear graphics and sets out a comprehensive analysis of the daylight and sunlight elements associated with the scheme and amenity areas.
7.	It is noted that the letter submitted from Irish Water states that a suitable sized pumping station may be required to be installed on your site. It is considered that this should be further investigated to avoid a scenario whereby the development may need to be amended during the Board's consideration of a formal planning application or post-decision.	We refer An Bord Pleanala to material enclosed from DBFL Consulting Engineers in response to this item. With reference to Section 3.1 of DBFL's Infrastructure Design Report, it is noted that existing foul drainage infrastructure is located adjacent to the site's eastern corner (at the northern end of Willow Grove). This pipeline outfalls to the east via a crossing under the N11 and Southpark. As the site generally falls from its western corner towards its eastern corner, a gravity foul drainage solution can be provided for the proposed development. It is also noted that Irish Water have issued a Statement of Design Acceptance in relation to the proposed foul drainage layout (refer to Section 3.2 of DBFL's Infrastructure Design Report).
8.	The submission of the 'Verified Photomontages' document is noted. This identifies 30 no. vantage points which were selected. However, only 11 no. of these vantage points (which are the 'green' vantage points) are included in the document while the 19 no. 'red' vantage points were not included. It is not clear why only 'green' vantage points are included as some of the red vantage points eg. No. 3 would have clear views of the proposed development. In addition, no vantage points were shown from Cabinteely Park/Cabinteely House as specifically referenced at the pre-planning meeting with the Council. While it is accepted that there will be no visual impact from some of the 'red' vantage points, additional photomontages should be submitted to include views from Cabinteely Park/Cabinteely House.	A full selection of views are now included in the pack enclosed from Modelworks. 33 views have been prepared in total. Views 32 and 33 identify the views from Cabinteely Park and the protected structure, namely Cabinteely House.
9.	Notwithstanding the absence of a Transportation Section report, the Planning Authority, as expressed during the pre-planning meeting, has concerns in relation to the low level of car parking provision for the proposed development	We refer An Bord Pleanala to the enclosed Traffic and Transport Assessment by DBFL Consulting Engineers, which sets out a detailed rationale in support of the car parking ratio of 0.58 spaces per unit.

	<p>and would seek to have the number of spaces increased. Approx. 0.59 car parking spaces per unit is provided. The Planning Authority will seek on space per unit as referenced in the pre-planning meeting. In addition, the Planning Authority does not concur with the statement in Section 10.4 (Car Parking) of the submitted 'Pre-Planning Report' that the subject site is located within a circa 10-15 min walk of the Green Luas Line, Carrickmines stop. This would be a significantly longer walk than ten to fifteen minutes.</p>	<p>The provision is considered more than appropriate for the site in the context of:</p> <ul style="list-style-type: none"> ⇒ the location adjacent to the N11 corridor ⇒ the BTR nature of the scheme; ⇒ the significant precedent offered by permitted BTR schemes ⇒ the national policy mandate to reduce the level and provision of car parking at central and accessible urban locations. <p>We also direct the attention of An Bord Pleanala to recent precedent examples for reduced car parking ratios for BTR development which include:</p> <p>0.25 per unit at Belgard Square, Tallaght (ABP Ref. 303306-18)</p> <p>0.33 per unit for lands at School House Lane, Santry (ABP Ref. 303358-19)</p> <p>0.44 per unit for lands at Davitt Road (ABP Ref. 303435-19)</p> <p>0.59 per unit for lands at Clarehall, Malahide (ABP Ref. 304196-19)</p> <p>0.8 per unit for lands at the Chivers Factory, Coolock (ABP Ref. 3043462-19)</p> <p>0.42 per unit for lands at Concorde Industrial Estate, Naas Road (ABP Ref. 304383-19)</p> <p>0.64 per unit for lands at Roselawn and Aberdour, Stillorgan (ABP Ref. 304068-19)</p>
<p>10.</p>	<p>Noise impact on proposed residents as a result of proximity to the N11 / Stillorgan dual carriageway was raised as an issue during the pre-planning meeting. The applicant indicated this would be addressed within an EIAR. It is considered that this is an important issue in terms of residential amenity for occupants.</p>	<p>We refer to Chapter 9 of the EIAR enclosed herewith prepared by AWN Consulting, which fully addresses the matter of noise impact.</p>
<p>11.</p>	<p>The development description on page 5 of the application form specifically refers to the apartments as being 1-12 storeys in height with Blocks B and F being referred to as being a minimum of 2 no. storeys in height. However, the apartment buildings all appear to be at least three storeys high and it would appear that the development description is inaccurate in this regard.</p>	<p>An accurate development description was submitted with the pre-planning application. For clarity, the updated description is now enclosed with the planning application. This description is consistent with the development proposed.</p> <p>For absolute clarity, we note that heights range from single to 2 storey for the proposed bungalow and semi - detached house units and from 3 – 12 storeys for Blocks A - H.</p>
<p>12.</p>	<p>The potential new permeability links to the N11/Stillorgan dual carriageway to the northern corner and to Willow Grove in</p>	<p>The lands required to facilitate a link are outside the ownership of the applicant and are not available for purchase. The current proposal</p>

	<p>the eastern corner are welcome links and will increase permeability through the site. The Planning Authority encouraged the investigation of an additional link to Old Bray Road to the south west, however this has not progressed.</p>	<p>facilitates 2 significant new connections 1) a new pedestrian and cycle link to the N11 and 2) a new pedestrian connection the adjoining Willow Grove development. In addition there will be pedestrian connectivity to the neighbourhood centre of Cornelscourt via the new vehicular entrance.</p> <p>The applicant does not control any additional property in the vicinity of the site to deliver on any additional permeability linkages. However, the applicant remains committed to exploring future links with the village to the south east of the site.</p>
13.	<p>The drawings contained within the 'Architectural Drawings' A3 document submitted with the application are too small to property inspect and they do not scale accurately. All drawings should be produced at an appropriate scale on properly sized pages for the formal application.</p>	<p>Full scale architectural drawings prepared by Henry J Lyons are enclosed with this application.</p>
14.	<p>The basement, first and second floor plans (Drawings Nos. PL1009-1011) shows three levels of accommodation for the 10 no. semi-detached houses along the south eastern boundary which are cited as being two-storey houses. The drawings portray a three storey house with 6 no. bedrooms and it appears to be a mistake in the drawings.</p>	<p>All architectural drawings prepared by Henry J Lyons and submitted herewith are now accurate.</p> <p>For avoidance of doubt, the houses proposed adjacent to the Willow Grove frontage are 2 storey in nature and have no rear windows at first floor level.</p>
15.	<p>The proposed ground floor plan (drawing no. PL1010) shows a 132 sq m room to the Old Bray Road frontage cited as 'F&B'. It appears that this is the proposed café/restaurant and 'F&B' may stand for 'food and beverage'. However, this should be clarified.</p>	<p>This element of the scheme is a café/restaurant and this is now clarified on drawings enclosed.</p>
16.	<p>The development should be in full accordance with the Sustainable Urban Drainage System Manual including inter alia, green roofs.</p>	<p>We refer the An Bord Pleanala to the DMURS report enclosed herewith prepared by DBFL Consulting Engineers.</p>

Table 5 - Response to Planning Authority Opinion

It is evident from the above that the applicant has positively addressed all concerns raised by the Planning Authority at pre-planning stage. Where there is a divergence in opinion the applicant has provided a supporting rationale for the various elements of the proposal under consideration.

8.2 Pre-Planning Meeting

A pre-planning meeting was held to discuss the proposal on 19 July 2019. We note that representatives from An Bord Pleanala, Dun Laoghaire Rathdown County Council and the Applicant attended this meeting.

The formal minutes from this meeting are enclosed herewith as Appendix 3 of this report. We confirm that the applicant has reviewed these minutes and application documentation enclosed herewith is reflective of all changes required.

8.3 An Bord Pleanala Opinion

Following consideration of the pre-planning application, a formal An Bord Pleanala Opinion dated 09 August 2019 was issued to the applicant for consideration.

A response to the An Bord Pleanala opinion is enclosed herewith as a separate report for review purposes. We note specifically that all matters raised have now been formally addressed and all prescribed bodies have been notified of the lodgement of this application as appropriate.

It is worth noting that the applicant made the decision to appoint a fresh Landscape Consultant following receipt of the Board's Opinion and in light of feedback received at the tripartite meeting. The proposals from Cameo & Partners significantly enhance the quality of the open space within the scheme, to provide an exceptional level of amenity for future residents.

9 THE PROPOSAL



Figure 9 - Views of the Proposal from the N11

The subject application is a high quality BTR development located at a key suburban infill site in the heart of Cornelscourt Neighbourhood Centre. The scheme has been designed by award winning architects to respond to the site context, national policy and international examples of BTR developments. The scheme delivers 468 residential units (452 apartments and 16 houses) and will include a range of communal facilities for the benefit of tenants including a reading room, lounge, gym and terrace.

The proposal also offers significant planning gain to the area by way of exceptional pedestrian and cyclist connections to Cornelscourt Neighbourhood Centre, the N11 and adjoining development; and the delivery of a new café /restaurant, which will integrate with Cornelscourt Neighbourhood Centre.

9.1 Development Summary

- 468 residential units (452 apartments and 16 houses) in the form of:
 - 41 no. studio apartment units,
 - 257 no. 1 bed apartment units,
 - 136 no. 2 bed apartment units;
 - 18 no. 3 bed apartment units;
 - 10 no. 3 bed semi-detached house units; and
 - 6 no. 1 bed bungalow units.
- A café / restaurant of c. 140 sq m; office space of 149 sq m; concierge of c. 149 sq m; and a residential tenant amenity space of c. 458 sq m is also proposed.
- 274 Car Parking Spaces (273 at basement level and 1 at surface level)
- 12 Motor Cycle Spaces
- 616 Bicycle Parking Spaces
- Public Open Space
- Vehicular Access
- Basement Areas

- 3 Sub Stations and 3 Switch Rooms
- All Associated Site Development Works

9.2 Site Layout

The extent of the site layout is set out below for context purposes.



Figure 10 - Site Layout

The development is comprised of a series of 8 buildings sitting upon a landscaped podium and surrounded by landscaped gardens. Along, the southern and eastern boundaries, 1 and 2 storey development is proposed in the form of bungalow and semi-detached houses.

Developing the scheme from the perimeter to the centre of the site has ensure that the design is integrated with the existing local fabric of Cornelscourt Neighbourhood Centre.

9.3 Residential Development

A total of 468 residential units (452 apartments and 16 houses) are proposed. Residential Mix is as follows:

- 41 x studio apartment units (8.7%)
- 257 x 1 bed apartment units (55%)
- 136 x 2 bed apartment units (29%)
- 18 x 3 bed apartment units (3.9%)
- 10 no. 3 bed house units (2.1%)
- 6 no. 1 bed house units (1.3%)

The following residential breakdown is delivered for the 452 apartment units in 8 Blocks (A-H):

- Block A (8 - 12 storeys) comprising 134 no. apartments (12 no. studio units, 93 no. 1 bed units and 29 no. 2 bed units);

- Block B (2 - 9 storeys) comprising 103 no. apartments (18 no. studio units, 65 no. 1 bed units; 14 no. 2 bed units and 6 no. 3 bed units);
- Block C (6 - 7 storeys) comprising 82 no. apartments (6 no. studio units, 60 no. 1 bed units and 16 no. 2 bed units);
- Block D (5 storeys) comprising 36 no. apartments (1 no. studio unit, 5 no. 1 bed units; and 30 no. 2 bed units);
- Block E (4 storeys) comprising 29 no. apartments (4 no. 1 bed units; and 25 no. 2 bed units);
- Block F (2 - 4 storeys) comprising 56 no. apartments (4 no. studio units, 24 no. 1 bed units; and 16 no. 2 bed units and 12 no. 3 bed units);
- Block G (3 storeys) comprising 6 no. apartments (3 no. 1 bed units and 3 no. 2 bed units); and
- Block H (3 storeys) comprising 6 no. apartments (3 no. 1 bed units and 3 no. 2 bed units).

9.4 Dual Aspect

A total of 259 of the 468 units proposed have the benefit of dual aspect equating to 55.3% of the units, which is an exceptional level of dual aspect within a BTR scheme. In some cases, units have the benefit of triple aspect. When considering apartment units only, the dual aspect ratio is 51.9% (243 of 452 apartment units), again an exceptional level of quality dual aspect units in accordance with national planning policy standards.

9.5 Heights

Heights of up to 12 storeys are proposed within the current development proposal. The heights proposed have had regard to proximity of the site to a public transport corridor; the prominence of the site along the N11; the capacity of the receiving environment to accommodate the development; and national planning policy direction.

The development consists of varying heights with the tallest element at 12 floors along the N11 frontage reducing to a two storey commercial building at Cornelscourt Neighbourhood Centre and buffered with single and 2 storey houses along the Cornelscourt and Willow Grove interfaces. The heights proposed are set out below.

Block	Height
Block A	8-12 storeys
Block B	2-9 storeys
Block C	6-7 storeys
Block D	5 storeys
Block E	4 storeys
Block F	2-4 storeys
Block G	3 storeys
Block H	3 storeys
Bungalow Houses	1 storey

Semi Detached Houses	2 storey
----------------------	----------

Table 6 - Heights Proposed

The following images, set out the provision of height across the site and the relationship to adjoining development:



Figure 11 - Proposed Heights across the Site



Figure 12 - Taller Elements along the N11

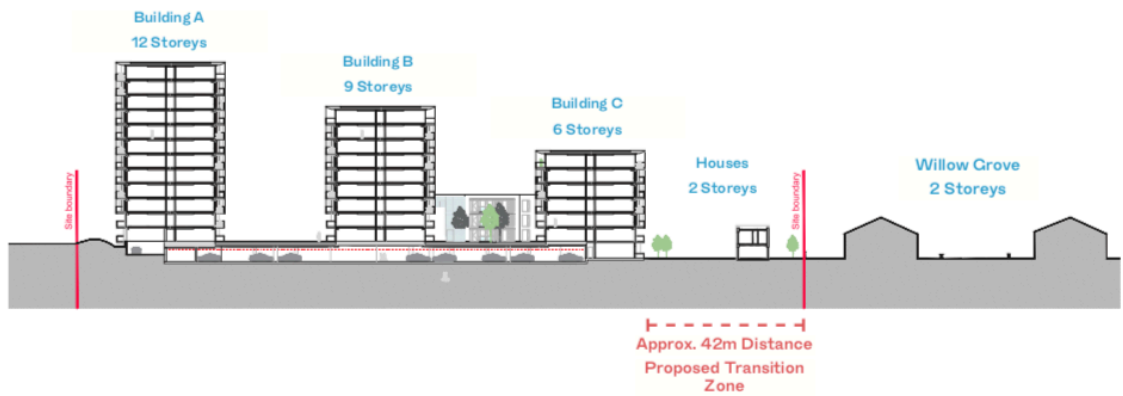


Figure 13 - Context for Proposed Height and adjoining development at Willow Grove

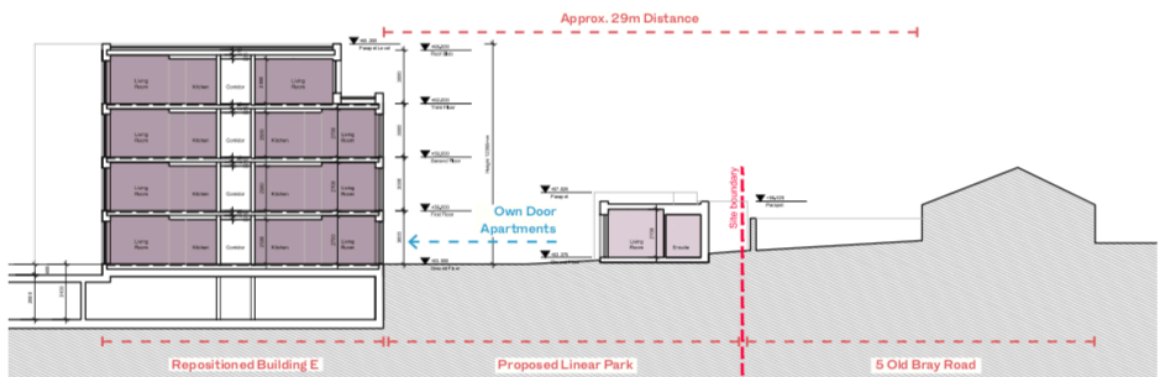


Figure 14 - Context for Proposed Height and adjoining development at Willow Grove

Blocks A, B and C range from six storeys to 12 storeys. The heights ascend in multiples of 3 to establish a distinctive identity along the N11 Corridor. This busy corridor provides a positive opportunity to increase density while not negatively impacting on the existing character of the village.

The design seeks to complement the existing streetscape of Cornelscourt to create a scheme that offers daylight and generous views towards Dublin Bay and the Dublin Mountains.

Blocks F, E and D ascend in scale carefully considering distance and height to allow light and ventilation into the central garden space and considerably responding to the scale and privacy of the neighbouring dwellings. Coupled with the single and two storey dwellings their scale, massing and composition positively integrate to the scale of the suburban neighbourhood.

Along the boundary with the Neighbourhood Centre of Cornelscourt, the proposed residential development responds to the low-rise nature of Old Bray road with the introduction and integration of a two storey structure containing a mix of uses; a cafe, tenant office space and concierge service / reception space. The introduction of a high quality palette of durable materials and the articulation of the form establishes an appropriate and considerate connection within the fabric of the village of Cornelscourt.

Along the south boundary of the proposed residential development (where existing cottages are situated along the Old Bray Road), single storey dwellings have been introduced to provide a sympathetic transition of scale between the existing neighbours and the proposal. To the east of the boundary, two storey semi-detached dwellings have been situated to present an appropriate transitional scale towards the houses of Willow Grove. We note that there are no rear first floor windows proposed for these units.

It is evident that the diverse range of heights proposed are a considered design response to the site's context and the importance of maintaining established residential amenity. As detailed in the supporting assessments, there are no material negative impacts (overlooking, overshadowing or

overbearing) arising from the proposed development. Appropriate separation distances are maintained both within the development and to adjoining existing development.

9.6 Residential Tenant Amenity Space

A key component of successful Built-to-Rent developments is a generous provision of well-considered and high-quality amenity spaces for the benefit, comfort and convenience of the residents. The applicant has visited a large number of existing schemes across both Europe and The United States and has used this experience to design a best in class offering for Cornelscourt.

The proposed development provides for two separate amenity blocks; one located centrally amongst the landscaped courtyard areas, and the other located at the entrance.

1. Central Amenity Building

Located centrally within the development attached to the southern gable of Block B there is a two storey residential amenity space providing for resident support facilities and amenities including a residents' lounge/reading room, gym facility, lobby area and outdoor landscaped terrace.

This point connects all blocks visually and sits adjacent to an open lawn allowing tenants the opportunity to engage with the landscaping through a glazed exterior. This creates a feeling of continuous flow between spaces and also serves to increase permeability across the scheme. This encourages use and access to the various internal and external shared spaces.

2. Entrance Amenity Building

Concierge facilities and residential support services (including office space) are also proposed at the entrance to the site along Old Bray Road. The facilities offered here provide for a management area, reception, parcel storage area and staff welfare facilities.

Amenity Design Considerations

These amenity spaces are designed with the requirements of a range of demographics in mind, and are based on a wealth of research in order to successfully address the needs of future residents including:

- Health & Wellness
- Convenient Lifestyle (i.e. the ability to work from home)
- A sense of Community

As a general principal, the allocation of amenity space needs to be mindful of the ongoing management costs it will incur. This has been factored in as a fundamental consideration in the proposed design. For example, a generous provision of communal external amenity space is proposed, such as a play and picnic areas, as these will be easier to manage than private gardens and take up less space overall.

A successful amenity provision includes a series of spaces that are communal, but are also adaptable in terms of use and designed in such a way that they can be enjoyed by both individuals or groups i.e. barbeque areas, picnic areas and informal co-working spaces.

To encourage the use of shared amenities, a 'focal point' often works well; in the case of the proposed scheme it is the central amenity. This is located at the heart of the scheme, in order to encourage a natural interaction between residents.

Community Entrance: The Concierge / Reception

The development will have a concierge at the entrance to the scheme fronting onto the Neighbourhood Centre. This will provide an impressive entrance for the scheme, and together with the café will offer an opportunity for natural integration into the Neighbourhood Centre. It will serve as a meeting place for residents, additional security, and a central hub where letting activity and key estate management services will be offered. For the estate manager, it provides a single space or base from which these elements can be pooled and managed efficiently.

Adjacent to this is a postal and parcel storage room. With the increasing prevalence of online shopping, suitably scaled storage is a vital component of a well thought out and futureproofed development. Research indicates that residents are likely to receive one package per week, though this could of course increase over time.



Figure 15 - Typical Reception Area



Figure 16 - Typical Reception Area

Central Multi-Purpose Community Space

It is important that amenity spaces remain flexible in terms of their design and fit-out, in order to be able to adapt to the needs of residents.

The example below shows how a room of c 50 sqm can be adapted for use as:

- A blank space or studio (e.g. for yoga or exercise classes)
- A meeting room
- A shared gathering space with a kitchen (e.g. for children's parties or other community group activities).

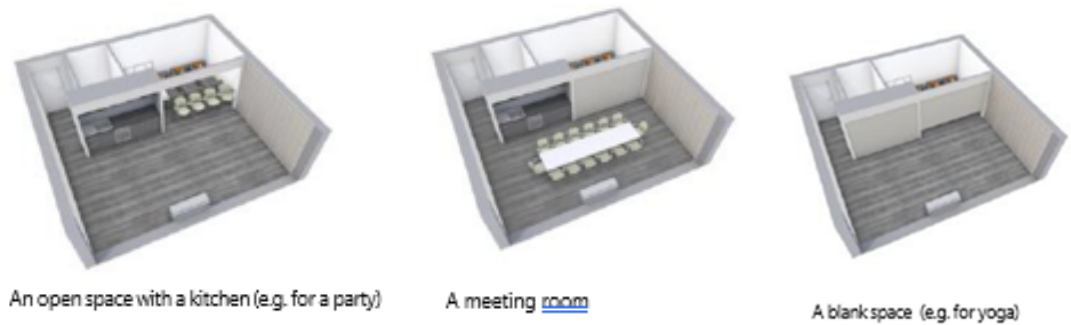


Figure 17 - Multi Purpose Spaces

Gym/Wellness Studio

The gym and wellness area is located centrally, such that it is easily accessible and convenient for all residents in the scheme. It is located on the ground floor, adjacent to the central amenity building in order to ensure minimum noise pollution for the residential units.



Figure 18 - Typical Gym Wellness Space

Residents' Lounge

A central lounge area can help create a sense of community by encouraging resident interaction. It can be used by residents as an extension of their private living space, either to meet and chat with friends and other residents, or as informal 'work from home' space, a trend which is increasingly growing in popularity.



Figure 19 - Typical Residents Lounge



Figure 20 - Typical Residents Lounge



Figure 21 - Typical Residents Lounge

A total of 756 sq m of amenity space is proposed within the scheme as follows:

Amenity Area	Sq m
Entrance Block Amenity Concierge & Office	298 sq m
Central Amenity Block	458 sq m
Total	756 sq m

Table 7 - Amenity Areas

The scale and type of the proposed amenity facilities has been provided and designed following extensive research of the BTR sector and is appropriate for a changing demographic market for purpose built and centrally managed rental accommodation.

The applicant is of the view that the scale and type of the proposed amenity is appropriate for and directly linked to the local market and the demand profile of the surrounding area.

9.7 Café / Restaurant and Office Space

Adjacent to the existing pedestrian and vehicular access point from Old Bray Road there will be a café/restaurant of 140 sq m. At first floor level is a proposed commercial office space of c. 149 sq m, for use by residents of the development.

The delivery of a café at this location is considered a significant planning gain for the wider Cornelscourt area in that it creates street frontage along the Old Bray Road. The delivery of an active use at street level will encourage vibrancy at street level. The office space at first floor is considered ancillary to the residential units delivered in that this will be shared office space for future residents of the scheme.



Figure 22 - Café/Restaurant at Street Level

9.8 Density

Residential Density proposed at this site is set out as 468 units on a 2.14 ha site (development site areas excluding pedestrian connection along the N11). This equates to 229 units per ha and is considered appropriate given the proximity of the site adjacent to the Quality Bus Corridor / Bus Priority Route at the N11 and the presence of the Green Luas line 1.8km from the site.

A density of this nature is supported by national policy which is aiming to deliver increased height and densities at appropriate locations.

We note the following density precedents for consideration of the 229 units per ha figure current proposed:

ABP Ref no.	Location	County Council	Number of Units	Scheme Type	Density Permitted
ABP-303358-19	Swords Road and School House Lane, Santry, Dublin 9	Dublin City Council	101	BTR	235 units per ha
ABP-303435-19	Former Dulux Factory site, Davitt Road, D12	Dublin City Council	265	BTR	311 units per ha
ABP-305176-19	Stillorgan Leisureplex, Old Dublin Road, Stillorgan	Dun Laoghaire Rathdown County Council	232	BTR	294 units per ha
ABP-301428-19	Carmanhall, Sandyford	Dun Laoghaire Rathdown County Council	495	Private	295 units per ha
ABP-304068-19	Roselawn and aberdour, Stillorgan Road, Foxrock, Dublin 18	Dun Laoghaire Rathdown County Council	142	BTR	166.5 units per ha

Table 8 - Density Precedents

The rationale for density is set out further in the enclosed Statement of Consistency.

9.9 Private Open Space Provision

Apartments

All residential apartment unit will be afforded with private open space in the form of a balcony or terrace. All balconies proposed have a minimum depth of 1.5m. In the majority of cases, all balconies are accessed off the living spaces and where possible also include access from a bedroom.

The Housing Quality Assessment enclosed herewith confirms that all apartment units proposed meet the minimum requirements of the Apartment Guidelines 2018. A unit by unit summary of provision is identified within this assessment.

Houses

All 16 house units are provided with private gardens. In summary, we note the following provision for private gardens associated with the house units proposed:

House Type	DLR Requirement	Provision
1 Bed	48 sq m	48-57 sq m
3 Bed	60 sq m	95-228 sq m

Table 9 - Private Open Space Provision

In terms of gardens depths, we note that the 2 storey units deliver distances of between c. 6.4 and c. 15m. Separation distances with adjoining dwellings at Willow Grove are delivered at 15.2 - 20.4m. Notably, the 10 x 2 storey house units proposed have no windows to the rear at first floor level, alleviating any potential concerns for overlooking.

Gardens associated with the bungalow units are mostly to the front and side of units. Bungalow units are located c. 1.2-2.4m from the adjoining boundary. This arrangement is considered appropriate on the basis of the single storey nature of the units proposed and the nature of the Build to Rent development typology proposed.

9.10 The Landscape Plan

The delivery of a quality open space proposal and an exceptional landscape masterplan for the site has been a key objective for this proposal and planning application. Following the pre-planning stage of this project with An Bord Pleanála, the applicant considered the initial concerns set out by the competent authorities and appointed Cameo & Partners Design Studio to a new and innovative landscape masterplan for the site.

The current design delivers generous and central open space areas with a permeable landscape layout, which will be accessible to all users. The quality of the open space now proposed coupled with the quantum of open space delivered has ensured the delivery of a superior landscape masterplan.

The competent authority is directed to the input from Cameo & Partners, which has been summarised in brief below:

Concept Development

The design concept surrounding the landscape plan has reviewed the use of clear and distinct zones; an ecology strategy; a social strategy; and passive and active open space uses.

Cameo's concept is based on the principle of relationships between the building, internal and external spaces and the connection to the garden.



Figure 23 - Landscape Masterplan

The open space concept has been focused on the following elements:

1. High quality, elegant entrance zone with ornamental planting.
2. Rock garden with water feature and seating.
3. Flexible play / activity area on amenity lawn and open space.
4. Paving with planted joints connecting the wider site.
5. Sculptural seating and social space with mound.
6. Rainwater gardens for informal play and enhance bio- diversity.
7. Reflecting water feature around the amneity space.
8. Sensory garden with scented planting which also provide food source for pollinators and enhance bio-diversity.
9. Activity zone with bbq.
10. Activity area for informal play and socializing.
11. Sunken play area with sinous path which connects activity nodes.
12. Activity nodes.
13. Informal play area.
14. Buffer planting with native trees and shrubs

15. Cycle and pedestrian connection with natural planting.

The design allows for active and passive spaces as follows:








-  Courtyard Gardens: relaxing, calming
-  Arrival Space: attractive, welcoming
-  Lounge and Hub: meeting, dining
-  Central Space: meeting, play, relaxation
-  Active Zones: play, bbq, sport

Figure 24 - Active and Passive Spaces

The open space strategy has been focused on providing connected and functional spaces that provide excellent amenity for residents and knit successfully into the existing context.

Character Areas

A number of character areas are proposed as follows:

1. Entrance Plaza & Drop Off Zone – A simple, understated, landscaped plaza. The surface here is open and expansive to allow vehicles manoeuvre appropriately but is enclosed by branches above to establish a sense of scale for residential users. This is a drop off area only with no permanent parking identified at this location. Key elements include a central grove of mature trees and a plaza area.

2. Tennant Amenity / Community Hub – This area will be a public spaces which sites at the heart of the development for new residents. The space will encourage people to socialise and interact. Key elements include rainwater garden, amenity lawns, dense planting and informal landscapes.
3. The Rock Garden – This spaces performs a variety of roles. It is welcoming to residents, promotes ecology and provides spaces for short term relaxation. Key elements include mounding landscapes, formal and geometric tree planting providing visual connection and central water feature.
4. The Scented Garden – A carefully selected palette of hard and soft materials continues to promote the approach of the design and includes native planting with high quality materials. Key elements include welcoming spaces, year around planting experiences, ecological diversity and high quality materials.
5. Activity and Play Area – Play Spaces and family gathering areas ensure new residents of all ages can enjoy the spaces. This spaces includes an undulating play and activity surface. Key elements include mounding landscapes, multi-age play areas, BBQ areas and planting.

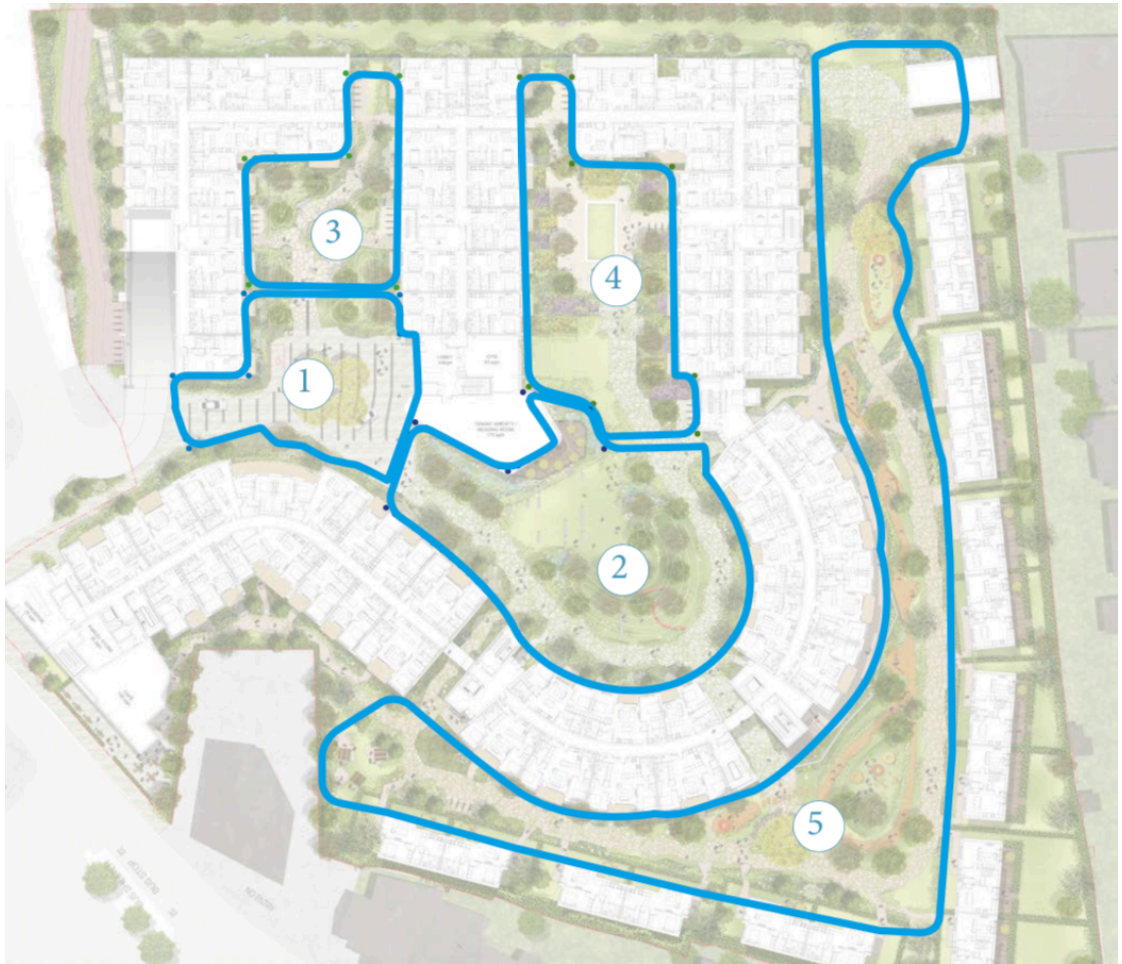


Figure 25 - Character Areas

The Quantum Delivered

A total of 7,511 sq m of public open space is proposed on site and the breakdown for this provision is set out further on page 16 of the Cameo & Partners Design Report submitted herewith. It is worth nothing that this provision is well in excess of the required minimum of 2,050 sq m or 10% of the development site area. The overall site area is c. 2.14 ha, which includes the pedestrian / cyclist connections to the N11. The requirement here increases to 2,140 sq m of open space if this larger site area is considered.

This is a significant provision for suburban site in the heart of a village centre. The open space areas will be open to the public and this is a significant planning gain for the local area. This provision is over

and above requirements of the relevant Development Plan and the Apartment Guidelines as set out in the material prepared by Cameo & Partners and as identified in the Statement of Consistency enclosed herewith.

Access and Permeability

Access and Permeability across the site has been a key focus for the design team from the outset of the design. The overriding objective has been to deliver a scheme that has clear paths for circulation for future residents but also one where the site is connected to local amenities, development and services.

In this regard, the site provides for the following pedestrian and vehicular connections:

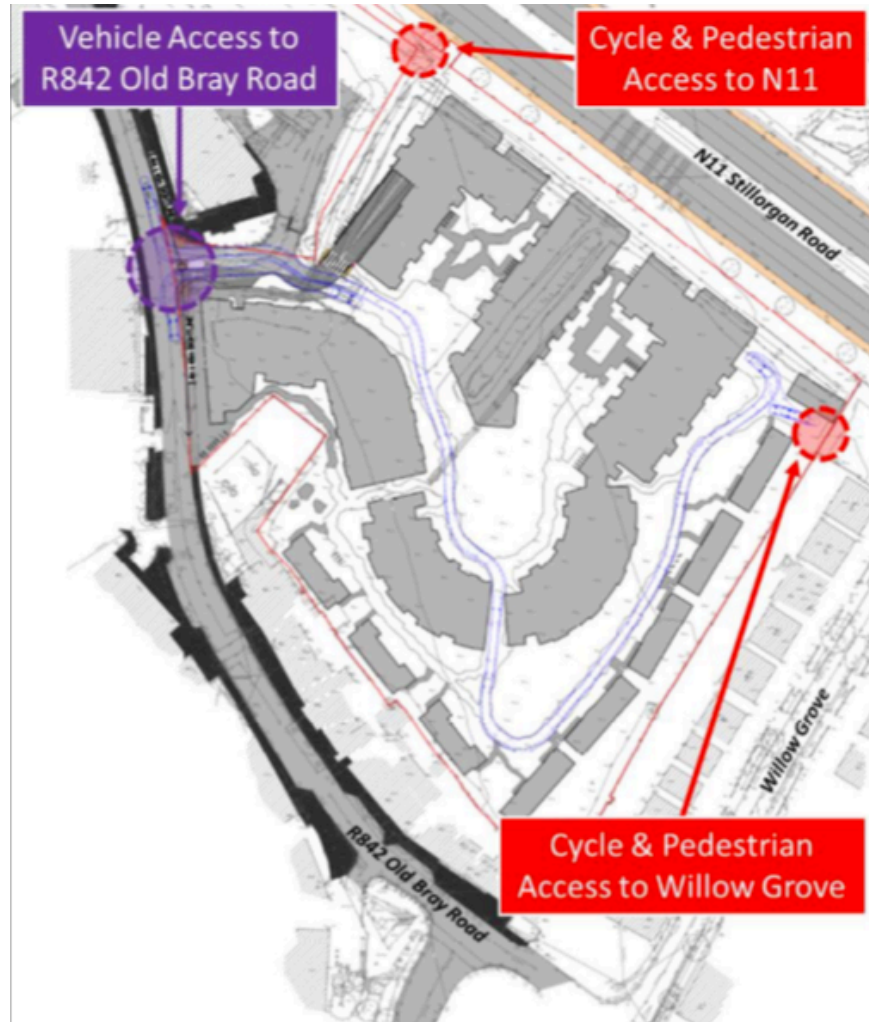


Figure 26 - Vehicular and Pedestrian Connections

The new cycle/pedestrian connections to the N11 and new pedestrian connection to Willow Grove (as identified in Figure 15) should not be underestimated. The site in its current condition acts as a buffer to the N11 with no direct access to same. The current proposal delivers significant points of connection, which will aid both future residents and those of surrounding developments.

The new vehicular access will also act as a new pedestrian connection to the Neighbourhood centre.

The diagrams below identify the extent of permeability for future residents and locals.

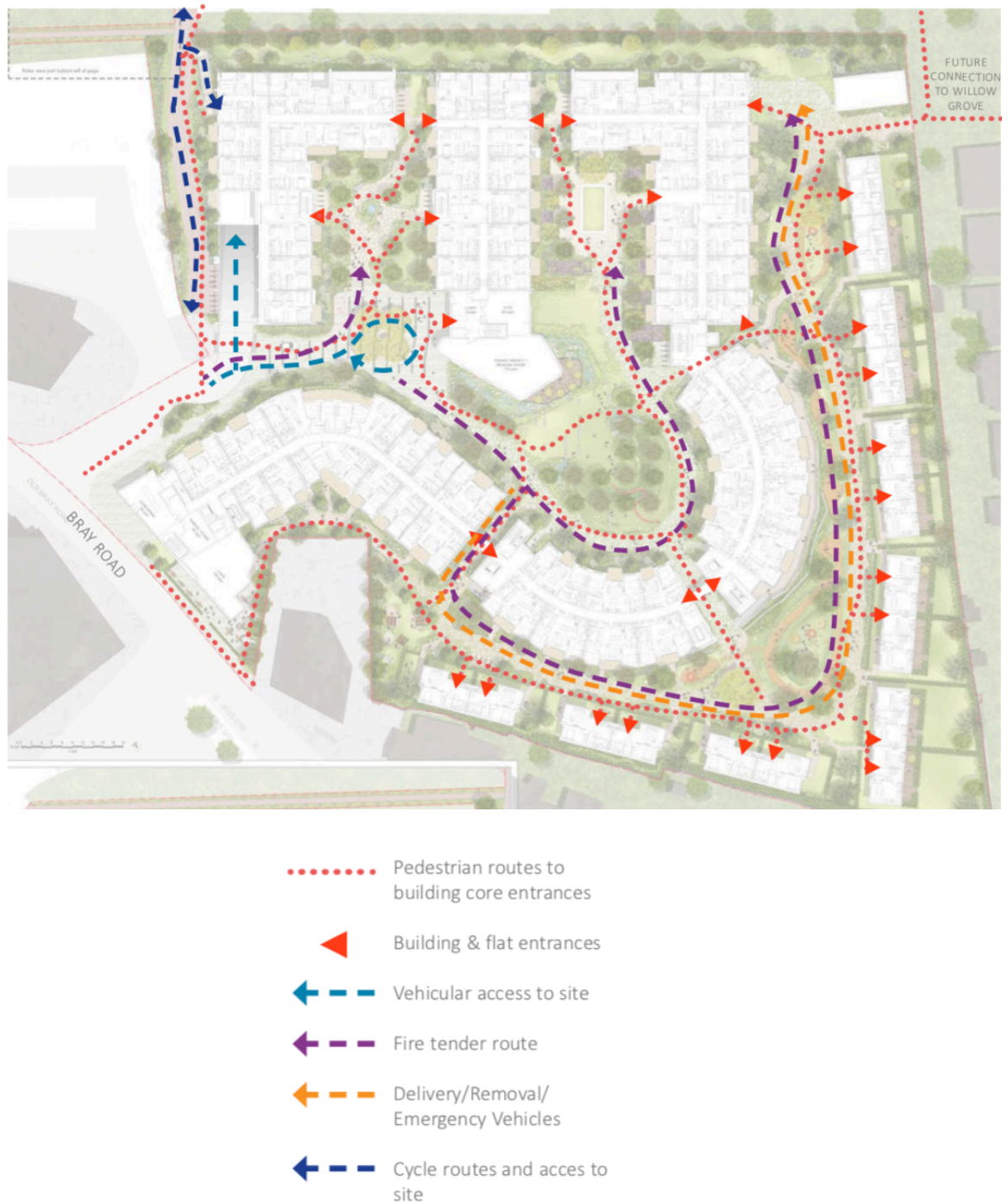


Figure 27 - Permeability throughout the Scheme

Overall, it is evident that a high quality landscape masterplan has been delivered for the site. The scheme offers a series of interlinked active and passive open spaces and with the creation of character areas, a real sense of place is created.

The proposal will be open to the public and the level of pedestrian connectivity delivered within the scheme and to surrounding areas is considered a significant planning gain for the local community. The site in its current condition acts as barrier or buffer to the N11. The current proposal will deliver connectivity, permeability and activity to both the site and surrounding area.

The current landscape proposal also provides for emergency access. The landscape masterplan provides for a series of green streets for shared used by pedestrians, disabled people and occasionally

by emergency vehicles. These 4m wide green streets incorporate a 1.5m wide natural stone surface and allows the grass and planting to protrude into the paving joints.

9.11 Car Parking

The transport proposals for the development have been designed in conjunction with DBFL Consulting Engineers.

Provision

A total of 274 car parking spaces are proposed (273 at basement level and 1 at surface level). This provision is assigned as follows:

- 247 no. basement car parking spaces are allocated for the 452 no. apartments (including visitor spaces and 11 no. mobility impaired spaces);
- 26 no. car parking spaces are allocated, at basement level, for the 10 no. 3 bed semi-detached houses and the 6 no. one bed bungalows;
- DBFL have also identified that 11 no. car parking spaces will be reserved as dedicated mobility impaired spaces as specified by the DLRCC requirements for 4% of the overall car parking provision;
 - 1 no. space will be at surface level by the development entrance;
 - 10 no. spaces will be at basement level;
- 28 no. electric vehicle charging points have been assigned as per DLRCC requirements; and
- 4% will be allocated as spaces for car sharing clubs (11 no. car parking spaces).

A drop off zone is also delivered at the entrance to the scheme.

Car Parking Ratios, Precedent and National Guidance

The car parking ratio proposed is 0.58 spaces per unit and this provision is supported by various assessments carried out by DBFL Consulting Engineers (refer to Traffic and Transport Report for further details).

We also note that a number of developments located in key transport corridors have been granted planning permission with relatively low car parking ratios being proposed. The BTR nature of these sites, public transport offering and the generous provision of cycle parking spaces has allowed for reduced car parking provision at these locations. We note the following examples of permitted car parking ratios for BTR development.

ABP Ref no.	Location	County Council	Number of Units	Parking Provided	Parking Ratio
ABP- 303306-18	The junction of Belgard Road and Belgard Square North, Tallaght, Dublin 24	South Dublin County	438	129	0.25 per unit
ABP-303358-19	Swords Road and School House Lane, Santry, Dublin 9.	Dublin City Council	101	34	0.33 per unit
ABP-303435-19	Former Dulux Factory site, Davitt Road, D12	Dublin City Council	265	119	0.44 per unit
ABP-304196-19	Clarehall, Malahide Road, Dublin 17.	Dublin City Council	132	79	0.59 per unit
ABP-304346 -19	Former Chivers Factory Site, Coolock Drive, Coolock, Dublin 17.	Dublin City Council	495	396	0.8 per unit
ABP-304383-19	Lands at Concorde Industrial Estate, Naas Road, Walkinstown, Dublin 12	Dublin City Council	492	244	0.42 per unit
ABP- 304068-19	Roselawn and aberdour, Stillorgan Road, Foxrock, Dublin 18	Dun Laoghaire Rathdown County Council	142	91	0.64 per unit
ABP - 305176-19	Stillorgan Leisureplex, Old Dublin Road, Stillorgan	Dun Laoghaire Rathdown County Council	232	162	0.41 per unit

Table 10 - Planning Precedent for Car Parking

It is clear from the above that BTR development has had ratios of between 0.25 spaces per unit and 0.8 spaces per unit granted in terms of planning precedent.

Furthermore and as clearly set out in the enclosed Statement of Consistency, the DOE Apartment Guidelines (2018) generally encourage reduced standards of car parking. The document defines accessible locations as falling into 3 categories:

- Central and/or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and/or Less Accessible Urban Locations

The subject site can be identified as a Central and / or Accessible Urban Location in that its location can be categorised as being “within easy walking distances (i.e. 5minutes or 400-500m) to/from high frequency urban bus services.” For this category, the Guidelines state that the default policy is for car parking to be minimised, substantially reduced or wholly eliminated in certain circumstances.

Furthermore, the Guidelines encourage that car parking is reduced for BTR development.

It is in consideration of the above and in having regard to (a) the site location adjacent to the N11; (b) the content of Section 4.6 of the Statement of Consistency prepared by Brock McClure Planning Consultants and (c) the content of the Traffic and Transport Assessment prepared by DBFL Consulting Engineers enclosed herewith that the current proposed ratio of 0.58 spaces per unit is considered appropriate.

Lastly, we note that the publication from Knight Frank entitled ‘Dublins PRS Tenant Survey’ confirms that only 59% of tenants survey confirmed that they would require a car parking space. The preferred mode of transport for renters surveyed was the bus at 32%.

9.12 Motor Cycle Parking

A total of 12 motorcycle spaces are proposed within the development at basement level.

9.13 Cycle Parking

A total of 616 bicycle spaces are proposed (512 at basement level and 104 at surface level).

9.14 Plot Ratio/Site Coverage

The plot ratio is at 1.82, and overall site coverage is kept low at .40, providing ample open public spaces.

9.15 Integration with Surrounding Uses

The material enclosed from Henry J Lyons and specifically the Design Report submitted provides details on how the proposal integrates with surrounding land uses. A couple of key points are identified below:

- A Village cafe is proposed at the entrance to the site adding to schemes integration into its broader context and specifically the neighbourhood centre at Old Bray Road.
- Uses within the site are appropriate in that the residential use proposed integrates with existing residential use at Willow Grove and the cottages along Old Bray Road.
- Building Heights have been design to integrate with surrounding development with a sensitive approach to building height along the boundaries with Old Bray Road and Willow Grove and a more explicit approach to building height along the N11 corridor.

9.16 Part V Provision

The proposal provides for 47 Part V residential units within the scheme, which meets with the 10% Part V Social and Affordable Housing Requirement. Specifically, a total of 23 no. 1 beds, 21 no. 2 beds and 3 no. 3 beds are proposed, The enclosed brochure from Henry J Lyons sets out further detail in relation to the Part V proposal as follows:

- Location of the Units
- Floor Plans
- Elevations
- Schedule of Accommodation
- Detailed Costings

9.17 Additional Proposals

In addition to the description set out above, we note that there is a comprehensive planning package now submitted setting out a description of proposals. In this regard, we refer An Bord Pleanala to the following inputs as appropriate:

Core Design Team:

- Henry J Lyons Architects - Full Set of Architectural Proposals, Part V Proposals
- Brock McClure Consultants - Full Suite of Planning Reports and Associated Material

- DBFL Consulting Engineers - Full Set of Engineering/Service Proposals
- OCSC - Full Set of Electrical Service Proposals
- Cameo + Partners - Full set of Landscape Proposals
- Arborists Associates - Full Set of Arboricultural Proposals
- IES - Detail on daylight and sunlight analysis
- Open Field - Details on Appropriate Assessment and Ecological Impact Assessment

Other Consultants

- Aramark - Building Lifecycle Report and Estate Management Strategy
- Byrne Environmental - Operational Waste Management Proposals
- Arborist Associates - Details on Arboricultural Proposals
- Archer Heritage - Details on Cultural Heritage
- IES - Details on the Microclimate associated with the development

9.18 Environmental Impact Assessment Report

We confirm for the competent authority that an Environmental Impact Assessment Report has been prepared and accompanies planning documentation enclosed herewith.

10 CONCLUSION

We invite the Board to consider the following:

- The scheme offers an exemplar Build to Rent (BTR) development of 468 units in the heart of Cornelscourt Neighbourhood Centre. It is an exceptionally well considered scheme, based on the models of international best practice, with ready access to excellent amenities such a resident lounge, gyms, reading areas, concierge facilities and immediate access to frequent public transport at the N11.
- The site is optimally located to provide for a Built to Rent development, higher residential density and additional height as directed by National Planning Policy. The Build to Rent units are of excellent quality, with generous floor areas, open space provisions, connections to public transport and sufficient car parking facilities.
- Demographic research for the Dublin Suburbs supports the delivery of smaller unit typologies and subject scheme has been developed as a direct reflection of key demographic findings.
- The proposal delivers a superb level of residential quality in the form of 452 apartments and 16 houses. The development has been the subject of a landscape masterplan proposal delivered by Cameo & Partners and delivers open space provision in the region of 7,511 sq m, which is an exceptional level of provision for a BTR scheme.
- Careful attention has been given to permeability with the surrounding context. We note specifically that 2 new connections are facilitated within the scheme, the first is a new pedestrian and cycle connection to the N11 and the second is a new pedestrian connection to the adjoining Willow Grove residential development.
- The proposal also offers significant planning gain to the area by way of new pedestrian and cyclist connections to Cornelscourt Neighbourhood Centre and the N11; and the delivery of a new café /restaurant, which will improve the vibrancy of Cornelscourt Neighbourhood Centre.

We ask that An Bord Pleanala consider these points in their assessment of this proposal and grant permission for the development.

11 APPENDIX 1 - PRE-PLANNING MINUTES AND CORRESPONDENCE WITH DLR

- Planning Authority Section 247 Formal Planning Notes
- Applicant Notes

1

Planning Authority Notes

PRE-APPLICATION CONSULTATION MEETING RECORD

PAC Ref. No.	PAC/SHD/28/19
Rec Date	22.01.2019
Date and Location of Meeting	27.02.2019 (2.30-4.15 Harbour Square Room 2) (Applicant had requested an extension of time for the meeting)
Address of Property	Cornelscourt
Brief Proposal Description	Residential Development
Attendees DLR	Louise McGauran, Planning Michele Costello, Planning Anthony Kelly, Planning Claire Casey, Transportation Elaine Carroll, Drainage Planning
Applicant (APP)	John White, Ardstone (applicant) Mark Forrest, Ardstone Steve Cassidy, Ardstone Suzanne McClure, Brock McClure Finghin Curraoin, Henry J Lyons Sean Astley, Henry J Lyons Brendan Keogh, DBFL Robert Kelly, DBFL Fergal Parlon, Mitchell + Associates

Each person briefly introduced themselves.

APP Stated that the development would be a Build-To-Rent (BTR) development and that an EIAR would be prepared. Baseline work is on-going. A meeting in relation to Part V had taken place the previous week. A brief background was given on the applicant, Ardstone, who have been involved in planning applications in other Council areas but this was their first in DLR. Recently started getting involved in the BTR model and intend to hold onto it with all the covenants etc. that involves. Noted that the meeting was a s247 meeting.

APP A distilled version of the hard copy presentation submitted at PAC stage was shown on a projector. This site is an opportunity for increased density and a 'fly-through' display was shown on screen. Proposed retail development connects into the village and existing adjacent development is protected. All development has frontage with nothing 'backing' on to space. Open spaces are quality spaces that involve variation. DLR noted that the number of units had been reduced from the 487 no. previously indicated to 476 no. (52 no. studios, 253 no. 1-beds, 124 no. 2-beds and 47 no. 3-beds). APP stated 5,400sqm communal space is provided although only 2,732sqm is required as a minimum. The residents' amenity space proposed is flexible (conciierge/management suite, gym, BBQ, party room, co-working). A café is proposed on the street frontage with the other uses possibly in the same building or the single storey central building on site. Animation of the street frontage is welcomed.

- DLR Queried the widths of paths through the open space. APP indicated that it was designed for fire tender/emergency access and that the scheme is designed to get cars into the basement car park as early as possible at the vehicular entrance. ESB access will also be required to the proposed substation in the west corner.
- APP Glass is maximised as a finishing material and the design uses the same language including bronze anodised elements and pop-out elements all to create a vibrant space centrally. Balconies have two angles to maximise views. A large number of viewpoints were indicated (these have not yet been prepared) and DLR requested a viewpoint from Cabinteely Park be added. Much of the landscaping will be on a podium which is designed for pedestrians but will have vehicular emergency access. Lawn areas are flexible and there are landscape buffers along the southern boundary.
- DLR Would strongly encourage permeability both within the site and to connect to outside the site e.g. to Willow Grove in the south east corner (unclear if this is taken in charge). This would require the detached house being removed which APP had no issue with. APP indicated that would willingly be facilitated and also queried if an additional connection to Old Bray Road in the west/south west would be welcomed. DLR stated it would be welcomed.
- APP Along the N11 boundary a hedgerow is proposed and then a tree line. DLR noted the proximity of the building line to the road. APP stated there was an 18m distance from the building line to the road edge. DLR noted this may have implications in terms of noise for residents. Noted this would be included in an EIAR. APP indicated that the NTA had yesterday (26.02.2019) published plans for a pedestrian footpath along the N11 boundary in addition to the existing cycle path. A link is proposed to the north eastern corner to the N11.
- DLR Noted that the area of public open space along the western area was not considered to be a particularly positive element of the layout as DLR are not normally in favour of open space areas backing onto private gardens (APP noted that many of these units are in commercial use rather than residential). DLR suggested this open space area could be fronted by dwellings backing onto the Old Bray Road e.g. maisonettes but this would require a fundamental alteration to the layout. APP were not favourably disposed towards this and stated that they try to increase the attractiveness and usability of this open space area by e.g. providing an improved play space, potentially providing a permeable access to Old Bray Road etc.
- DLR Described the proposed development as a very high development of significant mass, bulk and scale and with a substantial number of single aspect units, long internal corridors and is very different to the existing pattern of development in the area. The proposed heights can be argued for in the context of the Building Height Guidelines. However, although the Specific Planning Policy Requirements in the Apartment Guidelines are significantly reduced for BTR schemes quality criteria must be achieved and in this regard DLR has concerns about the public open space and the number of single aspect units is disappointing in the context of a large greenfield site with limited restrictions. With the length of internal corridors there is an impression that light is not a major consideration in terms of design.
- APP Considers that DLR are focused on the interior layout of the development rather than exterior. The western public open space area is considered by APP to be critical to the scheme but it can be improved in terms of usability and

desirability and they would be opposed, at this stage, to a fundamental re-design of that area.

- APP In terms of transportation issues it was noted that the existing road would be slightly lengthened to access the site and that a separate cyclists ramp would be provided. APP stated that the existing road was 50% owned by them and that they have the legal consent to extend it etc. DLR requested documentary evidence of this with the application. An improvement for pedestrians would be necessary at the junction with the public road. 100 no. surface and 500 no. basement bicycle parking spaces are proposed. Only 0.6 car parking spaces per unit is proposed which is what APP considers to be necessary at this location for a BTR scheme. DLR stated that 1 space per unit would be looked for on this scheme. APP argued against this on the basis that more spaces would result in less public open space and significant surface car parking. Visitor parking, taxi pull-in, electric charging, Go Car provision etc. would all also have to be taken into consideration in the overall design.
- APP In terms of surface water drainage this will connect to the public scheme in the south eastern corner. DLR noted that foul and water were matters for Irish Water and not DLR. A permeable podium deck is provided with a drainage board and green roofs. Solar panels are also proposed on the roofs and DLR noted that a surface combining green roof and solar was feasible. Open space areas will be permeable as will much of the hardstanding. Attenuation systems will be provided. DLR expressed concern at the proximity of the proposed tanks to the buildings as there could possibly be issues with the undermining of foundations. Cross section drawings would be important.
- DLR Noted that the results of the Crèche Facilities Assessment were very surprising and were not likely to be accepted as presented. A School Assessment would also be necessary. It was noted that many of these issues would be addressed in the EIAR.
- DLR The principal issue at this stage was a concern about the interaction between the site and the village side. It is a significant development and tying it into the urban grain is important. The scheme appears to be very close to the service station. The height and density appear to be acceptable in principle under the new guidelines and additional permeability links would be a significant addition to the scheme.
- DLR Stated that another meeting would be accommodated if APP requested one once sufficient additional detail had been forwarded.

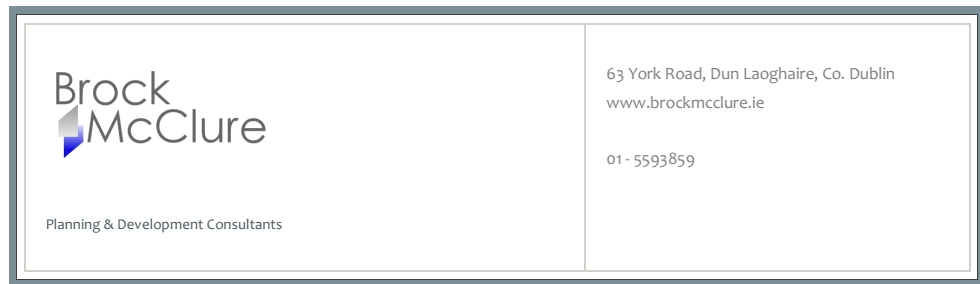
Signature of Planner: Anthony Kelly

Date: 27.02.2019

Anthony Kelly | Executive Planner
Planning Department

Correspondence: Dun Laoghaire-Rathdown County Council, Planning Department,
County Hall, Marine Road, Dun Laoghaire, Co. Dublin.
Tel: 01 2054356 | Fax: 01 2803133
Email: anthonykelly@dlrcoco.ie | Web: www.dlrcoco.ie

Applicant Pre-Planning Notes



Pre-Planning Meeting with Dun Laoghaire Rathdown County Council - Cornelscourt SHD

Meeting Date

27 February 2019

Meeting Time

2.30pm

Attendees - Design Team

Finghin Curraoin (FC) (Henry J Lyons)

Sean Attley (SA) (Henry J Lyons)

Suzanne McClure (SMcC) (Brock McClure)

Mark Forrest (MF) (Ardstone)

John White (JW) (Ardstone)

Steve Cassidy (SC) (Ardstone)

Brendan Keogh (BK) (DBFL)

Robert Kelly (RK) (DBFL)

Fergal Parlon (FP) (Mitchell Associates)

Attendees - Dun Laoghaire Rathdown County Council

Louise McGauran (LMcG) - Senior Planner (Partial Attendance)

Michelle Costello (MCo) - Senior Executive Planner

Anthony Kelly (AK) - Executive Planner

Elaine Carroll (EC) - Drainage

Clare Casey (CC) - Transportation



Meeting Minutes and Actions

Introductions		Action
1.	Introduction from Brock McClure	N/A
2.	Client Background from Ardstone	N/A
3.	DLR noted that no Parks Representative was available. Advised FP to contact Ruairi O'Dúlaing directly.	Mitchells
Planning Comments		
1.	FC presented the scheme with the aid of a fly thru, on screen imagery and 3d model. FP presented landscape masterplan.	Noted
2.	MC noted the viewpoints identified and suggested a view from Cabinteely park and the Protected Structure	Noted
3.	MC queried access points through Blocks D,E,F. Preference would be for distinct routes through blocks to open space	HJL
4.	MC welcomed the opportunity for vitality at the interface with the village. The coffee shop was accepted with a preference for active use at upper floors. Reservation about gym use screening activity and not contributing to the streetscape.	Noted
5.	CC and MC queried separation distance to N11 and stated that it seemed too tight. There would be a need for noise mitigation.	Noted
6.	RK presented the current NTA proposals for works along the N11 corridor. CC expressed safety concerns regarding traffic speeds, desire lines and flow of pedestrians/cyclists.	DBFL/HJL
7.	CC and MC expressed a preference for a pedestrian/cyclist connection to Willow Grove. This would require the omission of a house, which DLR stated was necessary as preference is not to have houses backing onto open space areas. Louise McGauran joined the meeting at this point.	HJL/ BMC
8.	LMcG stated that the DLR team were not happy with the relationship of Block D, E, F to the cottages on the Old Bray Road. The open space backing onto the units was considered dead space with no activity. There was a suggestion of maisonette units to run along the boundary.	ALL
9.	LMcG stated that first glance the scheme was very urban and did not fit the character of Cornelscourt, it would be more suited to a Sandyford typology. The fact that the scheme was designed a PRS product was discussed and the design team reiterated the commercial drivers and market research that has guided the design process to date.	Noted
10.	LMcG and MC stated that the dual aspect ratio should be improved and the extent of long corridors was concern. MC stated security concerns and the need for a breaks in the corridor lengths.	HJL
11.	LMcG stated that the case for height would be made through the National Guidelines.	Noted
12.	LMcG stated that DLR did not agree with the applicant's Childcare Assessment in screening out crèche provision on site.	BMC
13.	LMcG stated that a Community Infrastructure & School Assessment Statement would be required.	BMC

14.	There was a discussion on how the issue with the relationship to the cottages could be resolved. MC stated that it Herbert Park was a positive example and that consideration needs to be given to the village context. It was noted that a direct connection to the village would be ideal if possible. SC confirmed it was not a feasible option at this stage.	ALL
15.	There was a discussion on the Vacant Site levy and the strict programme that the team are working to. LMcG expressed a preference for further meetings to address the design issues raised by the Planning Authority.	NOTE
Roads		
1.	Ideally a ratio of 1:1 is required for car parking. CC and DLR Planning team do not accept rationale for 0.6 spaces per unit and it was stated that ABP is beginning to support DLR's position on this issue. A reduced standard would need to be supported by strong evidence based case.	Noted
2.	Design Team set out the case for a reduced car parking standard. It was noted that a BTR scheme would be covered by a Covenant and specific mobility management measures could be included eg. Go Car, Bleeper Bikes etc.	DBFL
3.	CC suggested that a bicycle maintenance space could be included in the scheme. MF confirmed that the scheme will be highly attractive to cyclists.	HJL/Client
Drainage		
1.	It was noted that solar panels and green roof areas were acceptable though the depth of the sedum roof should be the max possible.	Noted
2.	Brendan Keogh to provide Notes of discussion	DBFL
Concluding Comments from Planning		
1.	LMcG stated that further design work is required on the points identified. It was stated that DLR are not solely concerned with the nature of the open space at the rear of the cottages but the overall block layout needs consideration/justification.	ALL
2.	Planning Authority would prefer another meeting prior to An Bord Pleanala Stage.	Noted

Suzanne McClure
 Brock McClure Consultants
 28 February 2019

12 APPENDIX 2 - TIC LETTER



Comhairle Contae Dhún Laoghaire-Ráth an Dúin, Halla an Chontae, Dún Laoghaire, Co. Átha Cliath, Éire. A96 K6C9
Dún Laoghaire-Rathdown County Council, County Hall, Dún Laoghaire, Co. Dublin, Ireland. A96 K6C9
T: 01 205 4700 F: 01 280 6969 www.dlrcoo.ie

Cert No: 10764

16/04/2019

Your Ref:

**Brock McClure,
63 York Rd.
Dun Laoghaire,
Co. Dublin.**

Re Premises: Willow Grove, Old Bray Road, Cornelscourt, Dublin 18.

Dear Sir or Madam:

I refer to your request of 12th April 2019 regarding the above address and wish to state that the area referred to in your letter is in the charge of the County Council.

Please note that responsibility for water-mains and sewers (apart from surface water sewers), was subsequently transferred to Irish Water from the 1st of January 2014 under Ministerial Order S.1. No 13/2015.

Yours faithfully,


**Pat Coffey, Senior Staff Officer.
Roads Maintenance.**

Receipt No. 9002761



13 APPENDIX 3 - PRE-PLANNING MINUTES WITH AN BORD PLEANALA



An
Bord
Pleanála

**Record of Meeting
ABP-304647-19**

Case Reference / Description	469 no. Build to rent (453 no. apartments and 16 no. houses) and associated site works. Lands at Cornelscourt Village, Old Bray Road, Cornelscourt, Dublin 18.		
Case Type	Section 5 Pre-Application Consultation Request		
Date:	19 th July, 2019	Start Time	11.10 am
Location	Offices of An Bord Pleanála	End Time	12.35am
Chairperson	Tom Rabbette	Executive Officer	Maeve Williams

Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning

Stephen O Sullivan, Senior Planning Inspector

Maeve Williams, Executive Officer

Representing Prospective Applicant:

Mark Forrest, Applicant

Steve Cassidy, Applicant

Robert Keran, Virtus Projects Managers

Suzanne McClure, Brook McClure – Planning Consultants

Linda McEllin, Brook McClure – Planning Consultants

Finghin Curraoin, Henry J Lyons Architects

Sean Attley, Henry J Lyons Architects

Brendan Keogh, DBFL Consulting Engineers

Dan Reilly, DBFL Consulting Engineers

Thomas Reilly, DBFL Consulting Engineers

Dave Kirkwood, Mitchell & Associates Landscape Architects - LVIA

Fergal Parlon, Mitchell & Associates Landscape Architects – LVIA

John Gleeson, Integrated Environmental Solutions – Daylight and Sunlight

Representing Planning Authority

Ger Ryan, Senior Planner
Naoimh Fleming, Planner
Anthony Kelly, Planner
Ruairí O'Dualaing, Parks and Landscape Services
Claire Casey, Transportation
Elaine Carroll, Drainage Planning.

Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, the Local Authority (LA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public, along with that file, should an application arise following the conclusion of this consultation process,
- ABP received a submission from the LA on 4th July, 2019 providing the records of consultations held pursuant to section 247 and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the LA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 10th June, 2019 formally requesting pre-application consultations with ABP. Prospective applicant advised of the need to comply with definition of SHD as set out in the Act of 2016, in relation to thresholds of development. It was also noted that the Inspector dealing with the pre-application consultation request would be different to who would deal with the application when it was submitted. Recording of the meeting is prohibited.

Agenda

1. Development Strategy including design, height, density, layout and housing mix.
2. Residential Amenity for occupants and Neighbours, including compliance with standards and access to daylight/sunlight.
3. Access and parking.
4. Drainage and water supply.
5. Any other matters.

1. Development Strategy including design, height, density, layout and housing mix

ABP comments:

- Clarity was sought regarding the development strategy including design, height, density, layout and housing mix for the proposed development. The documentation submitted with any application should set out the justification for these factors concisely and without undue repetition

Planning Authority's comments:

- Its position was outlined in its written submission.
- The potential of the site to accommodate a substantial level of residential development was recognised
- The density and height of the proposed development are challenging and differ from the established pattern in the area.
- Height of the buildings not in compliance with the provisions of county development plan, appendix 9 of which sets out modifiers that can justify higher buildings which the prospective applicant should address.
- The development would not provide a wide mix of housing types and concern was expressed about the proportion of studio and one-bedroom units

Prospective Applicant's response:

- The proposed scale, height and housing mix are justified
- With regards to height and appendix 9, the development is on a large greenfield site beside a wide dual carriageway on the N11 which is a public transport corridor
- Researched developments in various parts of the world to gain a larger insight into how other counties have designed developments that will support the housing needs of the Irish population having regard to demographic shifts.

Further ABP comments:

- The discussion between the parties about whether the height of the proposed development would materially contravene the development plan was noted. The matter cannot be resolved in the pre-application process. The prospective applicant was advised to consult further with the planning authority and to ensure that the appropriate documentation was submitted with any application if it considered that the proposed development would materially contravene a provision of the development plan.

2. Residential Amenity for occupants and Neighbours, including compliance with standards and access to daylight/sunlight.

ABP comments:

- Clarity was sought from the prospective applicant regarding residential amenity for occupants and neighbours, including compliance with standards and access to daylight/sunlight for this proposed development and neighbouring properties

Planning Authority's comments:

- Concern was raised about aspects of the proposed development.
- It lacked a space that would function like a public park, there is very strong demand for this type of amenity in the county
- It is unclear whether the proposed planting could be carried out above basement car parking
- It would have long corridors with single aspect apartments on both sides
- Not all units would meet daylight and sunlight standards
- There would be inward noise from the N11

Prospective Applicant's response:

- The proposed development would achieve exemplary standards in relation to daylight and sunlight
- The corridors would be broken up with atriums, and would provide access to the amenity facilities for residents which are a key element of the scheme
- The proposed development would include a very large amount of open space
- Inward noise would be addressed in an EIAR

Further ABP comments:

- The board's representatives noted that there was a difference of approach regarding the provision of open space between the parties. They also stated that the BRE document on sunlight and daylight had been regarded in previous cases as design guidance, rather than as establishing mandatory standards

3. Access and parking

ABP comments:

- Clarity was sought from the prospective applicant regarding access and parking for the proposed development, in particular the proposed entrance whose width appeared to inhibit pedestrian movement across it through the village

Planning Authority's comments:

- The amount of car parking was limited, which requires justification as well as measures to manage excess demand.
- Bicycle parking should suit a range of users and different types of bike
- The development should be future-proofed against proposals for the N11 under BusConnects
- Consideration should be given to pedestrian access to the open space at Willow Grove.

Prospective Applicant's response:

- The 2018 apartment guidelines state that the default position is that less parking is provided for build-to-let schemes
- The open space at Willow Park is in the council's charge, but the applicant can facilitate such an access if the council wishes to provide one.
- A range of bike storage can be provided
- The proposed entrance can be tightened up. There is a shared right of way with the neighbouring bank regarding the entrance into site.

4. Drainage and water supply.

Planning Authority's response:

- Referred to items set out on its written submission. They did not affect the principle of development. Landscaping should be compatible with attenuation proposals.

Prospective Applicant's response:

- Issued raised at s.247 meeting with the LA have been considered and will be addressed in documentation and will take on board when lodging the application.
- Irish Water (IW) have confirmed that they are not aware of any known constraints.

ABP comments:

- Issued raised by council and Irish Water should be addressed in documentation submitted with any application.

5. Any other matters:

Prospective Applicant's comments:

- Landscaping of the proposed development will be outlined in greater detail at the application stage, with particular attention to diversity of trees, draining and podiums.

Planning Authority's comments:

- It is key site adjacent to other local amenities in the area.
- Ensure greater detail around landscaping at application stage

Further ABP comments:

- No contradictions should arise between the website, the hard copy and e-format.

Conclusions

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published
- Sample notices, application form and procedures are available on the ABP website
- Irish Water would like prospective applicants to contact Irish Water at **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is spatialplanning@water.ie



Tom Rabbette
Assistant Director of Planning

gr August, 2019

14 APPENDIX 4 - BLEEPER BIKE SUPPORT



BleeperBike
Rear of 24
South Richmond Street
Portobello
Dublin 2
D02 HF29

14th October 2019

Re: **Cornelscourt, Dun Laoghaire Rathdown.**
GPS coordinates: 53°16'09.0"N 6°09'59.0"W

To Whom It May Concern,

Thank you for registering an interest in integrating Bleeper Bikes into the Mobility Plan for the proposed development at Cornelscourt. Whilst the location is currently not within our operating zone it is scheduled for inclusion in 2020 therefore we would be delighted to work with Ardstone Homes to ensure the sustainable cycle needs of the residents and others living nearby are met, with the provision of BleeperBike parking either on site or close by.

BleeperBike currently runs a fleet of 700 shared bicycles throughout the administrative areas of Dublin City, Dun Laoghaire Rathdown and Fingal. The bicycles are available to use 19hrs per day (5am-12am) and are used primarily for short journeys (1-5km distances), with a typical journey time averaging 10-15 minutes. The bicycles are equipped with a 'smart lock' system utilising GPS and 3/4G technology, which works in tandem with our bespoke App. To unlock a bike, a user simply downloads the app, selects a payment plan and provides basic personal information. Once this is complete they open the App and scan the unique QR code on the bicycle lock to unlock the bike.

BleeperBike offers residents easy access to a fleet of bicycles that can be used for short to middle distance trips, which can **significantly reduce their dependency on car ownership.**

Regards,

John Buckley

John Buckley
Business Development Manager
BleeperBike Ireland Opco Limited

Directors: Hugh Cooney
BleeperBike Ireland Opco Limited (company number 601088)
Registered in Dublin, Ireland