

**Statement of Response to
An Bord Pleanála Opinion**

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

On behalf of

Cornel Living Limited

December 2019



Planning & Development Consultants

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1 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed to prepare this Statement of Response on behalf our client **Cornel Living Limited, Riverside One, Sir John Rogerson's Quay, Dublin 2.**

The development proposal provides for of **468 Built to Rent residential units, 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.**

This response has been prepared with direct input from:

- Henry J Lyons, Design Architects
- DBFL Consulting Engineers
- Cameo + Partners, Landscape Architects
- IES

Where appropriate, formal response pieces are prepared by the above consultants and are enclosed with this application for reference purposes. This report aims to deliver an overview of the response to all matters raised in the opinion issued under ABP - 304647-19 dated 9 August 2019.

2 REQUIREMENT FOR THIS REPORT

This report is prepared in response to the issues raised by An Bord Pleanála following the pre-planning application process for a Strategic Housing Development at the subject site. ABP Pre-Application Reference ABP-304647-19 refers and the opinion issued in response to the pre-planning application lodged was dated 9 August 2019.

An Bord Pleanála clearly set out the following in the formal ‘Notice of Pre-Application Consultation Opinion’ issued:

“Following consideration of the issues raised during the consultation process, and having regard to the opinion of the Planning Authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.”

Specifically, An Bord Pleanála required:

“Further consideration/amendment of the submitted documentation as it relates to the development strategy for the site and its consistency with national and local planning policy. The documentation should concisely set out the justification for the scale, design, housing mix and tenure of the proposed development by referring to its specific characteristics and those of the surrounding area, as well as to the provisions of guidelines issued by the minister under section 28 of the planning act and the county development plan and to any other policies that may be material to the application”.

The opinion further set out specific information that should be submitted with the application. Section 4 of this report sets out a comprehensive Design Team response to the requested items.

In addition, the opinion set out that the applicant shall notify the following authorities in the event of the making of a formal planning application:

- Irish Water
- Transport Infrastructure Ireland
- National Transport Authority

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

3 DESIGN EVOLUTION

The scheme now submitted represents the evolution of a design process that reflects engagement through the consultation stage. The Design Team have responded positively to key issues raised by the Planning Authority and An Bord Pleanála, in order to present a scheme that fully aligns with national planning policy direction.

3.1 Evolution of the Overall Site Layout Design

A detailed evolution of the site layout is identified in Chapter 4 of the EIAR submitted with this application.

In summary, the evolution of the site layout involved the consideration of a number of complex designs, which naturally progressed towards the current scheme. Options A, B and C are summarised in brief below followed by some key points on the rationale for the optimal scheme now submitted.

Option A

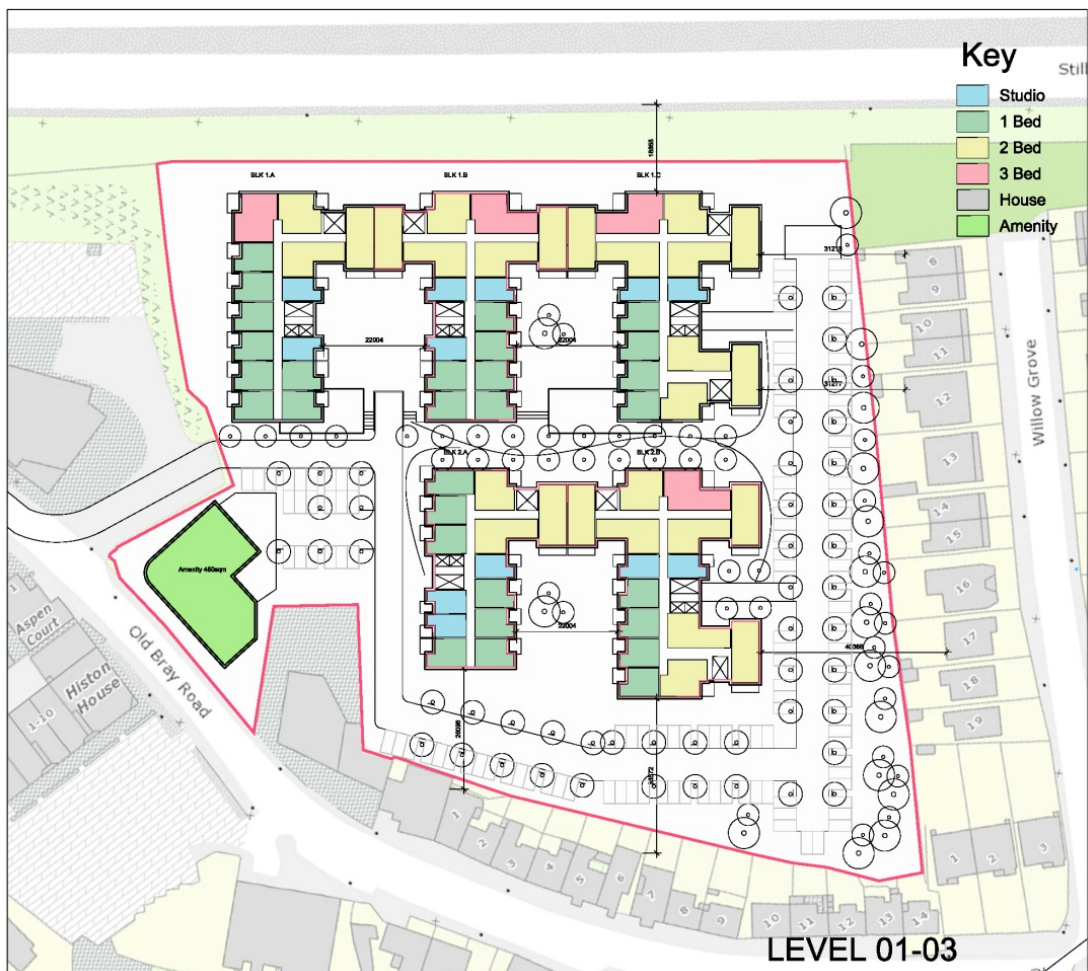


Figure 1 - Option A

Option A comprised of a series of buildings arranged off a pedestrian avenue and surrounded by landscaped gardens containing surface car parking.

With this option there was no clearly defined hierarchy of public, semi-public and private spaces. The central pedestrian avenue did not cultivate a sense of arrival for residents and the use of surface car parking was not a suitable integration within the surrounding context of Cornelscourt or efficient use of lands. For these reasons, Option A was not considered an appropriate layout for the site.

Option B Proposal



Figure 2 - Option B

This Option B proposal comprised of a series of buildings arranged off a pedestrian avenue and surrounded by landscaped gardens containing surface car parking.

Despite the scheme’s merits it had failed to properly integrate with the surrounding context, which resulted in unsuccessful and underutilised public spaces and a difference in scale along the boundaries. Furthermore, the central podium did not establish useable space for the residents.

For these reasons, Option B was not considered the optimum layout for the site.

Section 247 Consultation Stage 1



Figure 3 - Option C

The Option C proposal was a progression of the previous Option B with further consideration given to the proposal's integration with surrounding development. This was the scheme originally presented to the Planning Authority for Section 247 Consultation in January 2019.

Section 247 Stage 2



Figure 4 - Option at Section 247 Stage

Following feedback received at the Section 247 Consultation meeting, the design team prepared a scheme in response to the particular concerns raised which in design terms, centered on Blocks E/F and the relationship with the village. In response, the height of Block E was reduced from 5 to a set back 4 storey building. The separation between Block E and the properties along the Old Bray Road was increased to 29 metres and own door access apartments were introduced in Block E to promote activity along that edge.

At this stage, the introduction of a pedestrian linkage to Willow Grove was included, through the omission of 1 house along the boundary (to the north east).

The Planning Authority declined to meet to discuss this enhanced scheme and the applicant therefore elected to proceed with a scheme for discussion with An Bord Pleanála.

An Bord Pleanála Consultation



Figure 5 - Option at Pre-App Stage with ABP

The scale and massing of Block E was carefully adjusted to provide an appropriate and sympathetic interface between the proposed site and existing dwellings of Old Bray Road. The introduction of single storey apartments along the boundary coupled with a generous external pedestrian link enhanced the open space and interaction between the proposed and existing dwellings.

The scheme was presented at the pre-application consultation with An Bord Pleanála and the Planning Authority. It was noted that a key issue for the local authority throughout the discussion related to concerns that the landscaping strategy had created inconsequential spaces, which were not suitable to

the quantity of residents within the proposed development. The provision of surface car parking spaces was also identified as an issue.

The applicant undertook to positively consider the issues raised and further refinement of the scheme was required.

Current Scheme



Figure 6 - Current Scheme Layout

Evidently, the current scheme builds upon all successful design objectives of the previous options and resolves their shortcomings as identified during the consultation process. The key concepts which have informed the development include the following:

- The arrangement of the buildings to give structure and form to the principal spaces and vistas;
- The modulation of the building forms to take maximum advantage of the views and orientation;
- The use of variety and distinctiveness in the architecture to create a sense of place by means of a range of building sizes, shapes, heights, materials and character;
- The provision of appropriately scaled, well orientated and ‘people-friendly’ external spaces including landscaped streets, courtyards, gardens and pedestrian streets;
- The creation of a clearly defined hierarchy of public, semi-public and private spaces, which provide legibility, permeability and connectivity and make it easy for residents and visitors to find their way around. Giving priority to walking, cycling and public transport, minimising the need for cars by providing attractive paths and cycle routes which facilitate safe access by users of all ages and degrees of personal mobility.

A primary design feature of the scheme is to ensure an appropriate transition in terms of height and massing from the village side of the development towards the N11.

The key concepts set out above have formulated a development that comprises a series of eight buildings sitting upon a landscaped podium and surrounded by landscaped gardens. Within the ensemble of 8 blocks; Blocks A, B and C range from 6 to 12 storeys. The heights ascend in multiples of 3 to establish a

distinctive identity along the N11 Corridor. 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.

The remaining blocks; Block D, E and F descend in scale from 5 to 2 storeys in height. Their height has been carefully considered to present an appropriate scale towards the neighbouring dwellings along Old Bray Road and Willow Grove. Setbacks have been introduced to Blocks D and Blocks E to further reduce the visual mass of the buildings.

These buildings are significantly lower than the taller elements which promote penetration of natural light into the courtyard. Variations in facade depth and the stepping of the building line for balconies and terraces further help to mitigate the massing and scale.

Along the southern and eastern boundaries of the site, careful attention has been given to integration with surrounding development and heights of 1 and 2 storeys are proposed at this location. The delivery of bungalow and 2 storey semi-detached units at this location is considered appropriate.

We trust the Board will acknowledge that there has been significant consideration given to an optimum layout for the site. Notably, the shortcomings of previous options for site layout has been pinpointed and addressed in detail. The current design is considered optimum in its layout and has been tested in terms of its performance visually and in relation to wind and microclimate and overshadowing. The supporting studies enclosed in the EIAR submitted herewith identifies the results of these studies, which support the layout submitted.

We trust that due consideration will be given to the evolution of the site layout now submitted in review of the proposal.

3.2 Appointment of Cameo & Partners

Following completion of the pre-planning stage of this project with An Bord Pleanála, the applicant considered the initial concerns set out by the Board and the Planning Authority in relation to the specific issue of landscape design. It was acknowledged that the proposed masterplan did not convey the generous scale and quality of spaces proposed.

The applicant therefore decided that a fully fresh approach was required and appointed Cameo & Partners Design Studio to produce a new, innovative and exciting landscape masterplan for the subject site. Significant evolution of the landscape design has therefore taken place. The key elements of the proposal are set out below.

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 for the scheme proposed.

The design concept surrounding the landscape plan has incorporated the use of clear and distinct zones; the implementation of an ecology strategy; the provision of a social strategy; and the provision of passive and active open space uses throughout the entirety of the scheme.

The overall design concept is fundamentally based on the principle of relationships between the building, internal and external spaces and the connection to the garden and this is to be welcomed.

The open space concept has been focused on the following landscape 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 amenity 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.

In addition, a number of **character areas** have been delivered as follows:

1. **Entrance Plaza/Drop Off Zone** - A simple, understated, hardscaped 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. **Tenant 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.

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 noting that this provision is well in excess of the required minimum of 2,050 sq m or 10% of the development site area.

It is also imperative to set out that access and permeability across the site has been a key focus for the design team from the outset of the landscape 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. Access is also delivered for Emergency vehicles and the disabled. Drop Off Zones have also been identified. Importantly, new connections are facilitated to the N11 (to the north of the site); the adjoining Willow Grove residential development (to the east of the site); and towards Cornelscourt village centre (to the south west of the site). These are fundamental connections for the permeability of a site that current acts as a buffer between Cornelscourt village and the N11.

Overall, significant progress has been made in the delivery of an exceptional landscape proposal for the development and this is a key factor for consideration in review of the design evolution associated with the scheme. The proposals submitted by Cameo deliver a significant amenity offering for the proposal and delivery of quality open space proposals are to be welcomed for this BTR development.

By way of a comparison in terms of landscape at pre-planning and planning stages, we note the following visual differences in landscape masterplans prepared:



Figure 7 - Overview of Landscape Proposals at Pre-App Stage



Figure 8 - Overview of landscape proposal at planning stage

3.3 Updated Dual Aspect Provision and Residential Mix

The dual aspect ratio has also been reviewed between pre-planning and planning application stages for the current proposal.

We note specifically an uplift in dual aspect provision from 44.1% to 55.2% between pre-planning stage and the current proposal submitted as part of planning application stage. This uplift is considered significant and offers an exceptional level of dual aspect and residential amenity within a BTR scheme. Notably, a total of 259 of the total 468 units proposed have the benefit of dual aspect. Of the 452 apartment units proposed a total of 243 units have the benefit of dual aspect or 51.9% of all apartments proposed.

The improvement to dual aspect is a direct reflection of design revisions to layouts and a change in development mix as follows:

Pre-Planning Stage

- 71 x studio apartment units (15.1%)
- 229 x 1 bed apartment units (48.9%)
- 130 x 2 bed apartment units (27.7%)
- 23 x 3 bed apartment units (4.9%)
- 10 no. 3 bed house units (2.1%)
- 6 no. 1 bed house units (1.3%)

Current Planning Application Stage

- 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%)

Evidently, there has been an reduction in the number of studio apartments and increase in the number of 1 bed units, which coupled with revisions to layout has increased the provision of dual aspect.

3.4 Reconsideration of Heights Proposed vis a vis National Guidance

Given the guidance issued by An Bord Pleanála at pre-planning stage, the applicant sought to again consider the heights proposed vis a vis national guidance and specifically vis a vis the Building Height Guidelines entitled '*Urban Development and Building Height Guidelines (2018)*'.

The design team have considered in detail the requirements of the Guidelines and have tested the scheme from a landscape and visual impact perspective; wind and microclimate perspective; and daylight and sunlight perspective to guide the building height strategy for the site. The supporting documentation enclosed herewith clearly sets out that the scheme performs exceptionally well in all cases and so the height strategy proposed in this case is considered appropriate. In summary the following approach has been taken with regard to height:

- Taller Elements are proposed along the N11 (Blocks A, B and C) with heights of 6, 9 and 12 storeys proposed. The N11 has been identified as the most appropriate location for additional height and the proposals submitted can be positively considered on this basis.

- A more sensitive approach to height is taken along the southern and eastern boundaries to the site (adjacent to Old Bray Road and Willow Grove) where 1 and 2 storey development prevails. The scheme currently submitted has opted to deliver a similar height character along these boundaries with 1 storey bungalows proposed to the south and 2 storey semi-detached houses to the east.
- As a point of transition, Blocks D, E and F are located centrally within the site between the taller blocks A, B and C and the proposed bungalow and semi-detached development. The heights proposed here generally range from 2-5 storeys.

The height strategy proposed within the scheme is well considered and is supported by national planning policy and a number of specialist studies enclosed with this planning application. Heights delivered are considered appropriate and align with national policy objectives and guidance. We trust that the design evolution associated with the height strategy will now be accepted in line with the supporting documentation enclosed herewith.

3.5 Elevation Strategy along the N11

As set out by HJL Design Architects, following pre-planning with An Bord Pleanála, the design team sought to improve some elements within the design of the scheme, most notably, the elevation treatment along the N11.

Whilst the development is part of Cornelscourt, the site is also considered to have an urban context along the N11. It is with the larger finger Buildings A, B and C that this more urban condition is addressed with an increase in height and change in style of architecture. The introduction of glazing and the formal framed elevations in brick and bronze add definition to these blocks along the N11.

The revised design seeks to better represent the identity of this residential proposed. The updated façade articulation reduces the visual scale of the elevation with the introduction of a tri-partite expression. The inclusion of varied rhythm of bronze coloured aluminium panels animates the façade while also introducing a more domestic scale along the N11; further reinforcing the buildings at this location.

Adjusting the horizontal presence of balcony edges further improves the identify of the proposal and reducing visual mass of the scheme along the n11.

The images below show the design evolution of the elevations.

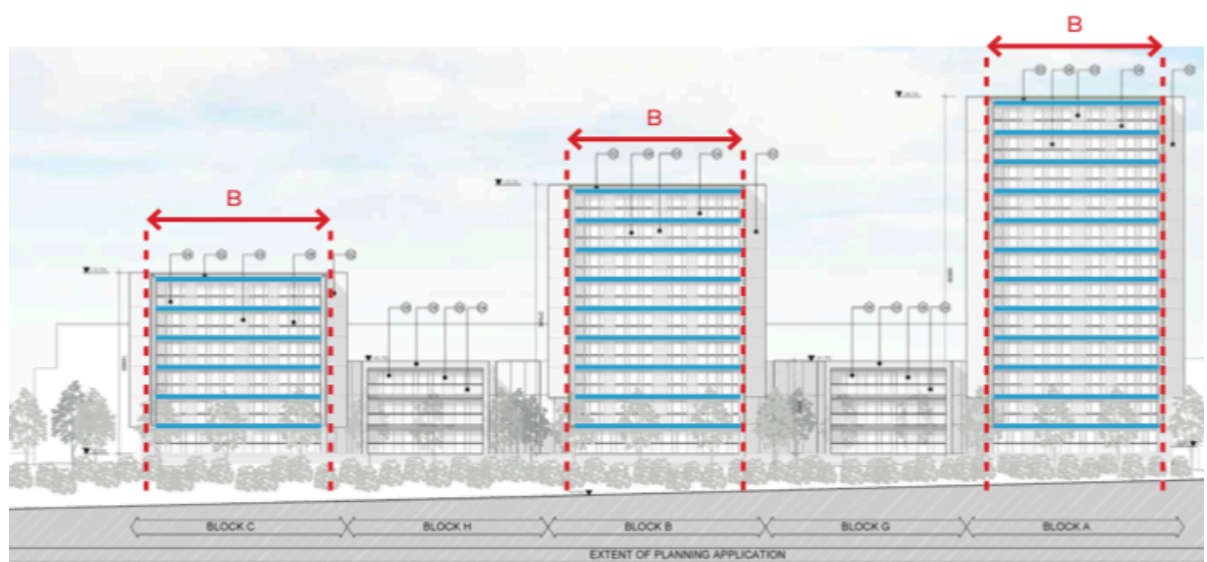


Figure 9 - Elevations at Pre-Planning Stage



Figure 10 - Elevations at Current Planning Application Stage

4 SPECIFIC INFORMATION REQUESTED

4.1 Further Consideration and Amendment of Documentation

An Bord Pleanala considered that the following issues need to be addressed in the documents submitted.

“Further consideration/amendment of the submitted documentation as it relates to the development strategy for the site and its consistency with national and local planning policy. The documentation should concisely set out the justification for the scale, design, housing mix and tenure of the proposed development by referring to its specific characteristics and those for the surrounding area, as well as to the provisions of guidelines issued by the minister under section 28 of the planning act and the county development plan and to any other policies that may be material to the application”.

Applicant Response

The applicant has considered the direction issued by An Bord Pleanala in relation to the scale, design, housing mix and tenure of the proposed development. We note specifically that the architectural rationale supporting the scale and design of the proposal has been examined and outlined in detail in the design statement prepared by Henry J Lyons enclosed herewith.

In terms of the development mix and tenure of the proposed development, we note the enclosed Planning Report from Brock McClure Planning Consultants, which sets out the basis on which the current proposal for build to rent development and the housing mix proposed can be positively considered.

Furthermore, we direct An Bord Pleanala to the following documentation in review of the proposal vis a vis ministerial guidance documents issued under Section 28 of the Planning Act:

- **Statement of Consistency** prepared by Brock McClure Planning and Development Consultants, which reviews the proposal in the context of all relevant Section 28 Ministerial Guidance.
- **Height Report** prepared by Henry J Lyons Architects and Brock McClure Planning and Development Consultants. This report reviews the height of the proposed development in line with guidance issued by the minister under the ‘Urban Development and Building Height Guidelines’ of 2018.
- **Housing Quality Assessment Report** prepared by Henry J Lyons Architects and Brock McClure Planning and Development Consultants. This report reviews the residential quality of the development and compliance of the scheme with the ‘Apartment Guidelines’ of 2018.

It is in consideration of the material submitted with this application that the proposal submitted can be positively reviewed. We note the following key points in relation to scale, design, housing mix and tenure in this regard:

Scale & Design

The scale and design of the proposed development has been the subject of a detailed design rationale. In terms of height, scale and massing, the material enclosed herewith has clearly set out that the proposal currently under consideration is the most appropriate form of development for the site. Notably, the height, scale and massing of each building has been carefully designed to correspond with the surrounding context of the N11, Cornelscourt Village, adjoining development at Willow Grove and the requirements set out in the Building Height Guidelines and DLRCC Development Plan.

Overall, the plot ratio is 1.82 and the overall site coverage is kept low at 0.4 providing ample public open space at a provision of c. 36%.

The consideration of building scale and specifically building height originates from the site’s sensitive boundaries with Willow Grove and Old Bray Road. 1 and 2 storey development is proposed at these locations with the design evolving from these boundaries with a transition to higher elements along the N11. We note at this point that the materiality used between the taller blocks (A, B and C) vary to that of the curved blocks (D, E & F) to provide variety and distinction in design. Materiality is discussed further in Section 4.6 of this report.

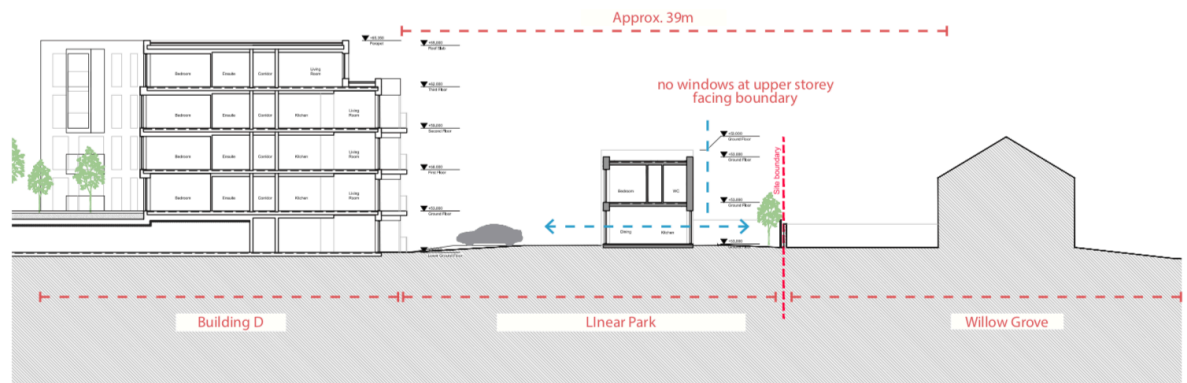
The following points are key considerations in terms of the scale and height now proposed.

Blocks A, B and C range from 6 - 12 storeys. While the development is part of Cornelscourt, it is also considered to be part of the emerging N11 corridor community. As such, the site straddles two conditions, suburban and urban and it is with the larger finger buildings A, B and C that the more urban condition is addressed.

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 and height, whilst ensuring that there is no significant negative impact on the existing character of the village. The design seeks to complement the existing streetscape of Cornelscourt to create a scheme that offers exceptional levels of daylight and sunlight and generous views towards Dublin Bay and the Dublin Mountains.

Block D is 5 storeys high and reduces to 4 storeys as it faces inwards towards the central garden. The height and scale of this block has been carefully considered to present an appropriate scale towards the neighbouring dwellings. The fourth floor has a setback to help reduce the visual mass of the building. Block D is significantly lower than the taller elements (along the boundary with the N11), which promotes penetration of natural light into the courtyard. Variations in facade depth and the stepping of the building line for balconies and terraces moderates the massing and scale of the building.

The perimeter of the site engages more closely with the surrounding existing context. By limiting the height of the development here to single and two storey houses (bungalows and semi-detached houses) it allows the entire site to taper towards a more traditional domestic scale. The addition of houses and bungalows also connects more successfully in terms of urban grain with the existing village. The relationship between Block D and the adjoining Willow Grove development is set out below.



Massing of Building D and Transitional Two Storey Houses Between Proposed Site and Willow Grove

Figure 11 - Relationship of Block D and Semi Detached Houses with Willow Grove

The scale and massing of **Block E** has also been carefully considered to provide an appropriate and sympathetic interface between the proposed site and existing dwellings of Old Bray Road. The introduction of own door access apartments and an enlarged external pedestrian link enhances the open space and interaction between the proposed strong planted buffer along boundary with rear of Old Bray Road properties.

It is the view of the Design Team that the introduction of own door apartments and an activated pedestrian route will contribute towards to the creation of a particularly positive open space area to the boundary with properties on Old Bray Road. The scale and massing of the development along the Old Bray Road boundary has been carefully considered to provide an appropriate and sympathetic interface between the proposed site and existing dwellings of Old Bray Road. The introduction single storey bungalows along the boundary and the scale of Block E coupled with a generous external pedestrian link enhances the open space and interaction between the proposed and existing dwellings along Old Bray Road. It is the view of the Design Team that the introduction of own door apartments and an activated pedestrian route will contribute towards to the creation of a particularly positive open space area to the boundary with properties on Old Bray Road.

The relationship between Block E, the proposed bungalows and the adjoining Willow Grove development is set out below.

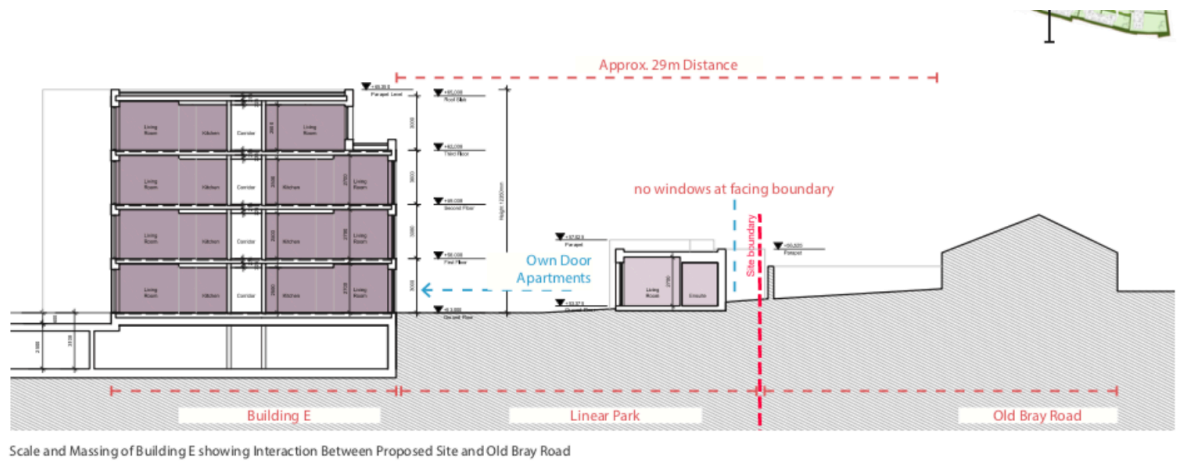


Figure 12 - Relationship between Block E, The Proposed Bungalows and Cottages at the Old Bray Road

Overall this considered approach has created a development that ties in with the existing fabric of the area while also increasing heights and density in areas where it is important and sympathetic to do so. Plot ratio is at 1.82 and overall site coverage at .40 is kept low providing ample open public spaces.

The scale of Block F responds to both the character of development at Old Bray Road and aims to frame the entrance to the site. Heights proposed vary from 2-4 storeys, which delivers integration with the existing streetscape at Old Bray Road and also delivers additional height at the entrance to the site, which provides a sense of entry to the scheme from Old Bray Road.

Overall, the scale and massing of the proposal submitted is considered appropriate to the site and it is evident that careful consideration of existing adjoining development has been delivered.

Housing Mix & Tenure

The applicant has invested significant time into researching local demographics and demand for housing in order to ascertain an appropriate housing mix and tenure for the current site.

Specifically, we note the enclosure of a report from Future Analytics, entitled *Demographic Drives and Changing Housing Demands in Dublin Over the Coming Decade*, which was commissioned by the applicant. The key points from this report, which have informed the current mix and tenure can be set out as follows:

- 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 evident from the above statistics that the average household size in Dublin is steadily decreasing. The pattern of falling household 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 a 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.

The proposal accords with national policy for the densification of sites and the provision of additional height along key public transport corridors, whilst ensuring that an appropriate relationship is delivered with adjoining development. The integration of the scheme with the wider Cornelscourt area has been a key objective for the design team from the outset of the design and the current proposal has successfully address the existing character of the area.

4.2 Specific Items Requested

The Board opinion sought the following specific items as part of the opinion. A response to each item is now set out below.

4.2.1 Item 1

A report demonstrating compliance with the Guidelines for Planning Authorities on Urban Development and Building Heights issued by the minister in December 2018 in accordance with SPPR3 of those guidelines.

Applicant Response

A detailed response to this item is set out in the enclosed report entitled 'Height Report' prepared by Henry J Lyons and Brock McClure Planning and Development Consultants.

This report reviews in detail the response of the development in terms of height to the scale of:

- 1 - The City and Town
- 2 - The Neighbourhood and Street
- 3 - The Site and Building

The report sets out clear response points on SPPR3 and specifically the development management criteria of the Building Height Guidelines.

The material submitted concludes that the current proposal for 1-12 storeys in height can be positively considered by An Bord Pleanála. The applicant is confident that the proposed development has addressed the specific development criteria requirements of the Guidelines and is in compliance with the key SPPRs. Most notably the site's location is considered to address the very spirit and intent of the Guidelines that being one proximate to a public transport corridor with high frequency services. The current site is therefore appropriate for increased building height and residential densities.

4.2.2 Item 2

A Housing Quality Assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with Section 6.13 of the 2018 guidelines should also be submitted.

Applicant Response

Henry J Lyons Architects have set out a detailed response to this item in the enclosed report entitled 'Housing Quality Assessment'. This report examines in detail the performance of the development vis a vis the standards contained within the 2018 Guidelines on Design Standards for New Apartments. Furthermore, compliance with the SPPRs set out within the apartment guidelines is detailed within the document.

We also refer An Bord Pleanála to the Building Lifecycle Report prepared by Aramark and submitted with this application.

We trust that the competent authority will consider the height in full in response to this item.

4.2.3 Item 3

Proposals for the management and operation of the proposed development as one including "Build to Rent" apartments in accordance with SPPR 7 of the 2018 Guidelines on Design Standards for New Apartments, including detailed proposals for the provision and management of support facilities, services

and amenities for residents, having regard to the proposal to provide other apartments for sale in the same proposed development.

Applicant Response

Firstly, it is necessary to confirm that the subject proposal is for the development of 468 Build to Rent units. There is no housing for sale proposed in the application. The Build to Rent nature of the development has been outlined in the public notices accompanying this planning application to An Bord Pleanála.

Please find enclosed detailed floor plans and schedules from Henry J Lyons providing details of facilities proposed within the scheme, which include a lounge area, gym, reception area, concierge and well - being areas.

As noted in the Guidelines (Section 4.6), communal facilities in such developments should be subject to negotiation and agreement with the developer and should not be imposed upon by the Planning Authority. The Guidance recognises that the provision of such facilities is likely to have significant implications for management and maintenance costs for future residents.

The applicant has undertaken significant research in this regard and the provision here is deemed appropriate and viable and is a direct response to the objective to provide affordable residential accommodation. The layout of the accommodation and the amenities proposed aims to provide a class leading Build to Rent project.

Section 9.6 of the Planning Report enclosed herewith sets out the relevant detail on the nature of residential amenity facilities proposed. We note the following in this regard:

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 principle, 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 village. This will provide an impressive entrance for the scheme, and together with the café will offer an opportunity for natural integration into the village. 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 13 - Image of Typical Reception Area



Figure 14 - Image of Typical Reception Area

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 15 - 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 16 - Gym/Wellness Studio

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 17 - Typical Lounge Space



Figure 18 - Typical Lounge Space



Figure 19 - Typical Lounge Space

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 1 - Amenity Areas

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.

Management of the Facilities

The amenity offer delivered within the current proposal shall be professionally managed with on - site staff providing 24 hour assistance in terms of maintenance, tenant move in/move out, visitor liaison and management of key amenity spaces.

We refer An Bord Pleanála to the Estate and Common Area Management Strategy Report prepared by Aramark, which sets out further operational detail of the development.

4.2.4 Item 4

A proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the proposed Build to Rent accommodation remains as such, and which imposes a requirement that the accommodation remains owned and operated by an institutional entity and that similarly no individual units are sold or rented separately. The proposed agreement shall be suitable to form the basis for an agreement under section 47 of the planning act between the planning authority and the owner of the site and it shall bind the owner and any successors in title for a minimum period of at least 15 years.

Applicant Response

We refer the Board to the Draft Legal Covenant prepared by McCann Fitzgerald Solicitors. This covenant is appended to the rear of this report for ease in review. Appendix 1 refers.

4.2.5 Item 5

A visual impact assessment including photomontages and details of proposed materials and finishes.

Applicant Response

We refer the Board to the enclosed LVIA prepared by Mitchell + Associates (included as Chapter 12 of the EIAR), which is based on photomontage views by Modelworks Visually, a total of 33 views are considered within the LVIA and we refer An Bord Pleanála to the detailed assessment of the views enclosed herewith for further detail on the visual impact of the proposal.

In summary however, we note the following comments in terms of the effects of the proposal on the landscape character of the area:

“The proposed development is well-researched and will provide a substantial volume of living accommodation within a relatively small space, complete with a range of associated recreational and social facilities and communal landscaped external spaces - a living environment of high quality which is both sustainable and durable. The scheme itself is designed in a manner which is respectful of its broader urban context and of the design details and fabric that sustain it. Whilst the higher rise elements of the scheme clearly contrast with its surrounding built context, it forms one of a series of higher rise elements already built, permitted or planned along the Stillorgan Road, signalling through its landmark scale, the location of Cornelscourt village on this main route into Dublin city. The development provides for public permeability into and through the site. The proposed development includes proposals to provide a significant quantum of new specimen trees throughout the scheme, to assist in the early integration of the new development into its existing context. In terms of its effects on landscape character and social and cultural amenity, it will provide moderate positive effects, which will be long term.”

In relation to proposed materials and finishes, we refer An Bord Pleanála to the Design Statement prepared by Henry J Lyons Architects which details the high quality finishes proposed.

The material palette for Cornelscourt is kept simple and clear to create order between the elements and to have a connection to its context. The material selection for the lower sections and floors has been chosen with care to enhance the soft landscape and to create a scheme that is pleasant and homely for the residents. For the larger buildings, a more formal and urban material palette has been chosen, this palette maintains the warmth of the lower buildings but adds a striking architectural edge in the form of large bronze frames and expansive glass curtain walling.

We summarise the main proposals from Henry J Lyons as follows:

Buildings A, B and C

In the taller elements, Blocks A, B and C, the facade is composed of a curtain walling glazing system with external natural anodized aluminium mullions and transoms and pale brick panels. The Bronze Anodised Aluminium Framing proposed creates a strong architectural identity for the development and delivers character to the development. Externally, the treatment visually reduces the scale of the building from afar.

In the taller elements, Buildings A, B, and C, along the N11 corridor, the façade is composed of a curtain walling glazing system with external natural anodized aluminium mullions and transoms and pale brick panels. This facade is framed in a bronze anodised aluminum edge element to the east and west that adds richness and detail to the scheme.

The anodised aluminium vertical and horizontal framing create a strong architectural identity. Externally, the treatment visually reduces the scale of the building from afar. Texture and coursing changes in the brickwork add animation to the internal gable facade facing the public realm and courtyards, subtly altering the fabric of the building from urban to a more suburban context.

High-quality brickwork is proposed on the external facade with large brick and bronze coloured frames enclosing the northeast and west facades. The use of highly specified, robust factory finished windows and doors, and glass balustrade balconies will also reduce ongoing maintenance costs. All of the mentioned materials will help create a building that resists deterioration and which is easily maintained and managed.

A summary of the materials used is identified below:

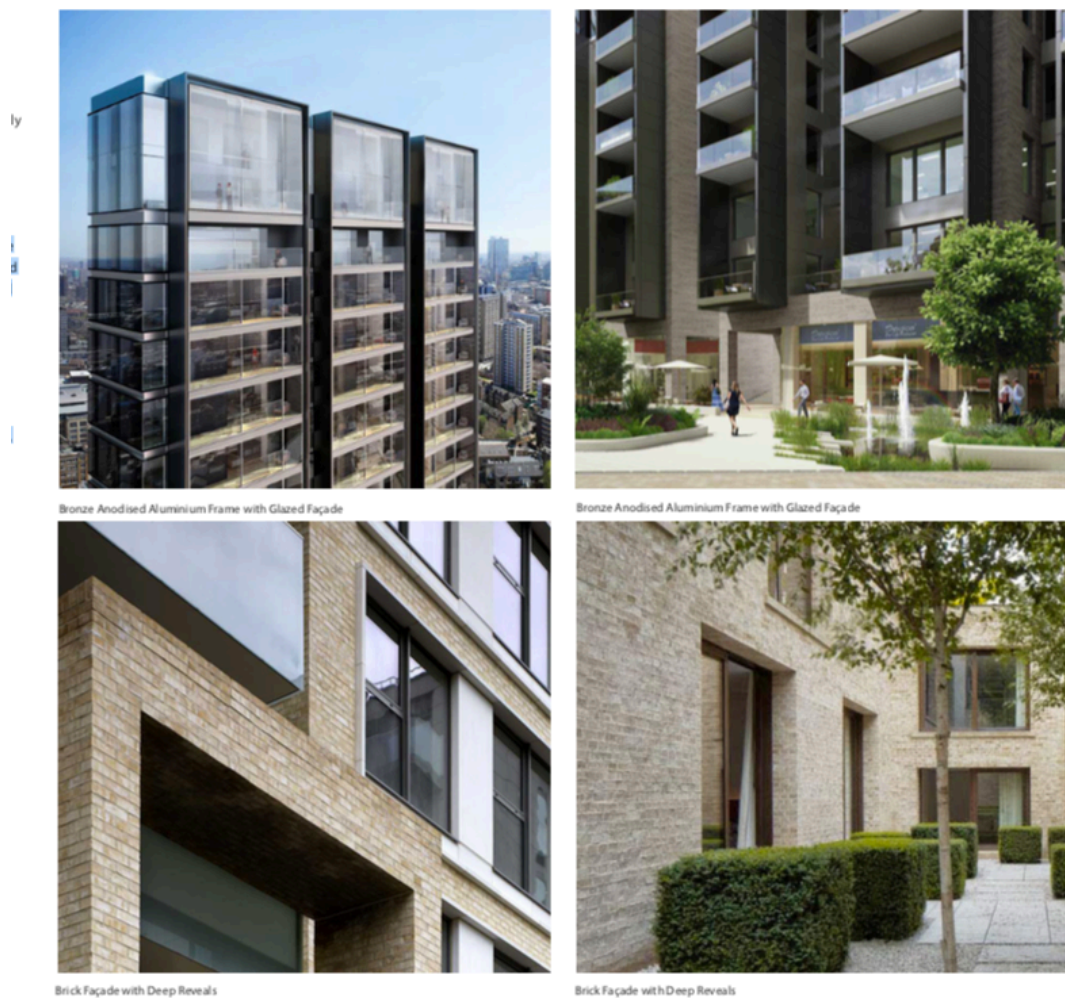
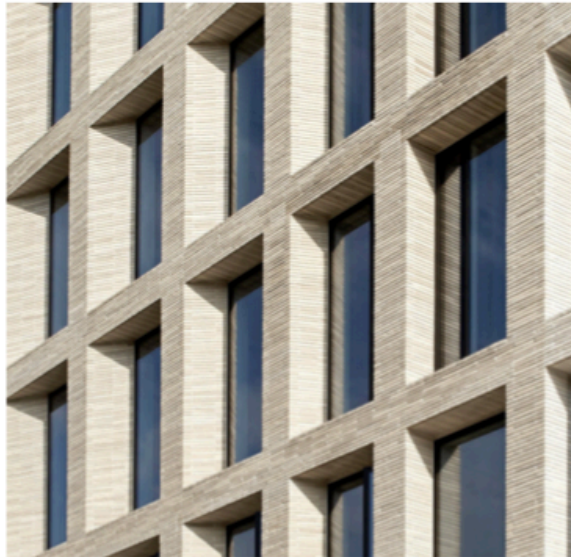


Figure 20 - Typical Materials Blocks A, B & C

Buildings D, E & F

For Buildings D, E, and F, the materials include brick, plaster render, and architectural concrete balconies with extensive glazing and feature elements of bronze anodised aluminium bay windows. Building F has plaster render façades which are complemented by bronze anodised aluminium parapet cappings and window cills.

The materials have been chosen as part of the scheme design, maintaining continuity of finishes and integration with the existing fabric. The projecting bronze anodised aluminium bay windows introduce an architectural quality increasing the uniqueness of the scheme reinforcing the concepts of placemaking, and creating a sense of ownership for residents of the development.



Brick Façade with Deep Reveals



Projecting Bronze Anodised Aluminium Clad Bay Windows



Projecting Bronze Anodised Aluminium Clad Bay Windows



Render Façade Complimented by Bronze Anodised Aluminium Windows and Cills

Figure 21 - Typical Materials Blocks D, E and F

Houses and Bungalows

Continuing the use of rich bronze, pale brick and glass here tie the scheme together. Added visual interest is created with alternating brick patterns and projected bands of brick on select portions of the housing. Helping create a rhythm along the facade of the houses. To highlight the entrance of each house, a strip of bronze divides the brick.

Café/Concierge

An expansive glass frontage promotes engagement and interaction with the community. At first-floor brick pillars and bronze framed windows are found providing privacy for the multi-use office and upper floors of the cafe.

Consideration is given to the requirements of Building Regulations to durability and design life of the materials. The development is designed to incorporate the guidance best practice principles to ensure that the long term durability and maintenance of finishes are an integral part of the design and specifications of the proposed development.



Entrance identified through material change



Entrance identified through material change/ expansive glazing

Figure 22 - Typical Materials

4.2.6 Item 6

A Transportation Impact Assessment and a mobility management plan that would interalia describe the management of the demand for parking arising from the proposed development. It should also demonstrate the entrance to the scheme would properly facilitate pedestrian movement across it.

Applicant Response

DBFL Consulting Engineers have prepared this response. We note the following in this regard:

“Details relating to parking demand management for the proposed development are outlined in Section 4.2 of DBFL’s Traffic and Transportation Assessment. This should be read in conjunction with DBFL’s Mobility Management Plan.

Details of the proposed site entrance are shown on DBFL Drawings 180208-DBFL-XX-XX-DR-C-2001 and 180208-DBFL-XX-XX-DR-C-2002. Also refer to Section 2.1 of DBFL Infrastructure Design Report and DBFL’s DMURS Compliance Statement.”

4.2.7 Item 7

A study of the impact of the proposed development on daylight and sunlight available to existing and proposed homes, including associated private and public open space.

Applicant Response

We refer An Bord Pleanála to the Environmental Impact Assessment enclosed herewith, which clearly sets out the assessment on daylight and sunlight. We refer specifically to Chapter 17 of the EIAR. The following points are notable in this regard:

Sunlight

- On the 21st March, the existing amenity rear gardens of properties at Willow Grove and Old Bray Road currently receiving 2 hours of sunlight for over half their area, will continue to do so with the proposed development operational.
- With regard to proposed amenity spaces, the analysis confirms that over half of the amenity spaces would receive at least 2 hours sunlight in line with BRE recommendations on 21st March.

Daylight

- With regard to daylight factors, 95% of the rooms tested in the new development are achieving Average Daylight Factor above BRE guidelines.

The height, scale, and massing of each building are carefully designed to correspond with the orientation of the site. By leaving taller elements of the development to the north adjacent the N11, with low-level units to the south, daylight and sunlight are invited into the courtyards and public amenity spaces. In addition, each building has excellent daylight and vista opportunities.

It is evident therefore from the above that there are no issues with overshadowing associated with the proposal. We refer An Bord Pleanála to the enclosed Chapter 17 of the EIAR for full details on the daylight and sunlight accessibility to the proposed homes and open space areas.

4.2.8 Item 8

A Site Specific Flood Risk Assessment Report. The prospective applicant is advised to consult with the relevant technical section of the planning authority prior to the completion of this report which should describe this consultation and clarify if there are any outstanding matters on which agreement has not been reached with regard to surface water drainage.

Applicant Response

A Site Specific Flood Risk Assessment has been prepared by DBFL Consulting Engineers. This Flood Risk Assessment has been the subject of consultations with the drainage department of Dun Laoghaire Rathdown County Council and DBFL Engineers are satisfied that the material submitted is now reflective of agreements on surface water drainage.

We note the following summary from the flood risk assessment:

“ The Site-Specific Flood Risk Assessment for proposed development at Cornelscourt Village, Old Bray Road, Dublin 18 was undertaken in accordance with the requirements of “The Planning System and Flood Risk Management, Guidelines for Planning Authorities” and its Technical Appendices.

Following the Flood Risk Assessment, it has been determined that the site is located in Flood Zone C as defined by the Guidelines.

It is concluded that the;

- *Proposed residential development is appropriate for the site’s flood zone category.*
- *The sequential approach outlined in Planning System and Flood Risk Management Guidelines has been adhered to and that the ‘Avoid’ principal has been achieved.*

In conclusion the proposed development is considered to have the required level of flood protection up to and including the 100 year return event.

Overland flow paths have been identified for pluvial flooding exceeding the capacity of the proposed surface water drainage network.”

In addition to the above, we note the following formal response piece from DBFL Consulting Engineers.

“Refer to DBFL’s Site Specific Flood Risk Assessment and Infrastructure Design Report (specifically Section 3, Surface Water Drainage).

JBA Consulting have carried out a Stage 1 Stormwater Audit of the proposed surface water drainage design. JBA conclude that “the surface water drainage design for the proposed development is acceptable and meets the requirement of the Stage 1 Stormwater Audit”.

This audit has been reviewed by DLR Water Services Section. Following their review of the Stormwater Audit, it is understood that the proposed surface water drainage design is generally acceptable to DLR Water Services Section.”

4.2.9 Item 9

A draft construction management plan and a draft waste management plan.

Applicant Response

We refer the Board to the enclosed Plans prepared by Byrne Environmental. These reports are entitled:

- Construction Phase Waste and By Product Management Plan
- Operational Phase Waste Management Plan

5 CONCLUSION

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

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

6 APPENDIX 1 - DRAFT LEGAL COVENANT

DATED

2019

Cornel Living Limited

and

Dun Laoghaire-Rathdown County Council

DRAFT / Section 47 Agreement

Build to Rent Premises at Cornelscourt, Dublin 18

McCann FitzGerald
Solicitors
Riverside One
Sir John Rogerson's Quay
Dublin 2
BNMS\32595497.2

Draft 1: 15 July 2019

MEMORANDUM OF AGREEMENT made on the 2019

BETWEEN:

- (1) Cornel Living Limited of Riverside One, Sir John Rogerson's Quay, Dublin 2, D02 X576 (the "Developer") of the one part; and
- (2) Dun Laoghaire-Rathdown County Council (the "County Council") of the other part.

RECITALS:

- (A) The Developer applied to An Bord Pleanála for Strategic Housing Development for permission under the Planning and Developments Acts 2000 to 2018 ("Planning Acts") to develop a 469 no. Build-To-Rent apartments which application was dated [•] ("Development") at lands Cornelscourt, Dublin 18 ("Development Site").
- (B) An Bord Pleanála granted permission, Register Reference [•] dated [•] ("Planning Permission") pursuant to the Planning Acts for the Development subject to certain conditions as described in the Planning Permission, a copy of which is included at Appendix A.
- (C) The Developer and the County Council, as planning authority for the functional area in which the Development Site is located, have agreed to enter into this agreement pursuant to condition no. [insert condition number] of the Planning Permission and Section 47 of the Planning Acts in relation to the use of the 469 no. Build-To-Rent apartments ("Relevant Development").

NOW THEREFORE IT IS AGREED AND DECLARED as follows:

1. The application for planning permission of the Developer dated the [•] (the plans, drawings and documents referred to therein) and the Planning Permission, are hereby incorporated in this Agreement and shall be read and construed therewith.
2. This Agreement shall bind the Developer and its Assignees and Successors in title and all persons claiming through or under it in accordance with the provisions of Section 47 of the Planning Acts.

Section 47 of the Planning Acts

3. In accordance with condition no. [insert condition number] of the Planning Permission and in accordance with Section 47 of the Planning Acts and in accordance with Section 5.0 of the Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments published March 2018, the Developer hereby covenants and agrees with the County Council to restrict and regulate the Relevant Development for the period of 15 (fifteen) years¹ from the date of the Planning Permission (the "Term") as follows:
 - (a) the Relevant Development shall remain owned and operated by a single entity;²
 - (b) no individual residential unit may be sold separately³ (save to a group company of the said single entity within the definition of holding company or subsidiary company under sections 7 and 8 of the Companies Act 2014 and/or any financial institution which provides debt funding to the said single entity in respect of the Relevant Development);

¹ The period specified in SPPR 7 of the Apartment Guidelines.

² The requirement explained at paragraph 5.3 and required by SPPR 7 of the Apartment Guidelines.

³ The requirement explained at paragraph 5.3 and required by SPPR 7 of the Apartment Guidelines.

Draft 1: 15 July 2019

- (c) no individual residential unit may be sub-let separately;⁴
 - (d) upon expiry of the Term, any of the individual residential units may be sold individually or collectively without the need for any further planning permission;⁵ and
 - (e) **[if necessary, any other conditions or matters to be agreed as part of the planning process]**
4. Nothing in Clause 3 of this Agreement shall prohibit:
- (a) sale of the entire of the Relevant Development to a single entity;⁶
 - (b) leasing of units in accordance with section 96(3)(b)(iva) of the Planning Acts, to satisfy the requirements of the County Council under Part V of the Planning Acts;⁷ or,
 - (c) the owner of the Relevant Development from leasing individual residential units as part its investment in the Relevant Development as a long term commercial rental undertaking.⁸
5. Upon expiry of the Term, the Developer shall be discharged from its obligations under this Agreement. Upon the written request of the Developer, the County Council shall provide an acknowledgment in writing of the satisfactory compliance by the Developer with its obligations under this Agreement.

⁴ The requirement explained at paragraph 5.3 and required by SPPR 7 of the Apartment Guidelines.

⁵ The requirement explained at paragraph 5.11 of the Apartment Guidelines.

⁶ The requirement explained at paragraph 5.3 and required by SPPR 7 of the Apartment Guidelines.

⁷ The requirement explained at paragraph 5.12 of the Apartment Guidelines.

⁸ The requirement explained at paragraph 5.3 of the Apartment Guidelines.

Draft 1: 15 July 2019

Appendix A
Planning Permission

Draft 1: 15 July 2019

In witness whereof the parties have executed this Deed the day and year first above written.

Present when the common seal of Cornel Living Limited was affixed to this deed and this deed was delivered:

[Director]

[Director/Secretary]

[County Council to confirm form of execution clause] Present when the common seal of County Council was affixed to this deed and this deed was delivered:

[Director]

[Director/Secretary]