

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

3 December 2021

Re: Strategic Housing Development Application to An Bord Pleanála

Construction of 419 no. Build-to-Rent (BTR) residential units, 1 no. childcare facilities, 1 no. retail/café unit and all associated site and development works at Cornelscourt Village, Old Bray Road, Cornelscourt, Dublin 18.

ABP Reference: 310042-21

Dear Sir

This application is made to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board dated 3 August 2021.

This correspondence identifies the following documentation and information submitted with this application:

1. The documentation submitted in compliance with articles 297 and 298 of the Planning and Development Regulations 2001 to 2019, as amended; and,
2. The information submitted pursuant to the Board's Notice of Pre-Application Consultation Opinion dated 3 August 2021, as required under article 297(3) of the Planning and Development Regulations 2001 to 2019, as amended.

1 Article 297 and 298 Requirements

The documentation required under article 297 is identified below:

- **297(1)** – The planning application form is submitted herewith
- **297(2)(a)** – Letters of consent from Dun Laoghaire Rathdown County Council and Allied Irish Bank plc are submitted herewith
- **297(2)(b)** – A copy of the newspaper Notice published in The Star on 7 December 2021 is attached herewith.

- **297(2)(c)** – HJL Dwg No. HJL SW 00 DR A 0001 provides a Site Location Map at a scale of 1:1,000 incorporating the requirements of parts (i) to (iv) is submitted herewith.
- **297(2)(d)** – Evidence form Irish Water that it is feasible to provide services is included at Appendix D of the Infrastructure Design Report prepared by DBFL Consulting Engineers and by way of Irish Water Statement of Design Acceptance submitted herewith.
- **297(2)(e)** – It is proposed to connect to a public sewer. As such, there is no requirement to submit documentation under this provision.
- **297(2)(f)** – A full Schedule of Drawings and Documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **297(2)(g)** – Details of compliance with Section 96 of the Planning and Development Act 2000 have been included at Section 4.5 of the Planning & Statement of Consistency Report submitted with the application. Details of Part V compliance including the location of units, calculations and methodology for calculating costs are included in the Part V Allocation Report prepared by HJL, Project Architects.
- **297(2)(h)** – Units to be transferred to the Planning Authority have been identified in the Part V Allocation Report prepared by HJL, Project Architects submitted herewith.
- **297(2)(i)** – Letters of consent from Dun Laoghaire Rathdown County Council and Allied Irish Bank plc are submitted herewith together with a drawing identifying their respective landownerships.
- **297(2)(j)** – The appropriate statutory fee of €78,228.40 has been paid by the applicant via EFT, a copy of remittance advice attached to Application Form
- **297(3)** – Section 2 below provides a statement of proposals to address the matters set out in the Board’s Notice of Pre-Application Consultation Opinion dated 3 August 2021.
- **297(4) and 298(1)** – A full Schedule of drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **298(2)** – This application does not propose any works to a protected structure or proposed protected structure or to the exterior of a structure which is located within an architectural conservation area.

The application is accompanied by an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

2 Statement of Proposals to Address Issues Raised in the Board's Notice of Pre-Application Consultation Opinion

The Board's Opinion of 3 August 2021, states that the documents submitted with the request to enter into consultations constituted a reasonable bases for an application for strategic housing development. The Opinion identified the following requirements:

1. **Specific information to be submitted with the Application.** The documentation submitted with this application is listed in Section 1 above and on the separate Schedule of Documents. This information includes all of the specific items identified in the Opinion.
2. **Authorities to be notified of the making of the Application.** Copies of the letters sent to these authorities notifying them of the application under section 8(1)(b) of the Act are submitted with this application.

3. The Board's Opinion – Specific Information to be Submitted with Application

The Board's Opinion identifies specific information to be submitted with any application for permission. This information has been included in the documents submitted herewith. To assist the Board and any interested parties in assessing the application the following sections provide a summary of the information submitted to address the matters raised in the Board's Opinion.

3.1 Water & Wastewater

Item 1 states:

Additional water and wastewater details which addresses matters raised in the report of Irish Water, dated 31st May 2021 to An Bord Pleanála. The documentation at application stage should clearly indicate the nature of infrastructural constraints, the proposals to address the constraints, the timelines involved relative to the construction and completion of the proposed development and any statutory consents required. (The prospective applicant may wish to satisfy themselves that an application is not premature having regard to the information sought above).

Following the pre-application consultation meeting with An Bord Pleanála and Dun Laoghaire Rathdown County Council in July 2021, the Applicant continued to engage with Irish Water with regard to constraints in the Foxrock catchment and interaction between the proposed development and foul drainage infrastructure within the Foxrock catchment.

Irish Water subsequently issued an updated confirmation of feasibility letter dated 4 October 2021 (see Appendix D of the Infrastructure Design Report prepared by DBFL). In response to the updated advice from Irish Water and requirements of the confirmation of feasibility letter the following is noted:

- The proposed development makes provision for an on-site 2,150 m³ balancing storage tank (located in the eastern corner of the site) which will facilitate a potential future upgrade of the Foxrock catchment by Irish Water.
- An 825mm diameter combined sewer will be constructed, traversing the site from the entrance at Old Bray Road to the 2,150m³ balancing storage tank (located in the eastern corner of the site). This pipeline will also facilitate a potential future upgrade of the Foxrock catchment by Irish Water.

- Provision of the balancing storage tank and 825mm diameter combined sewer as noted above is not required to facilitate the proposed development and will form part of potential future upgrades of the wider Foxrock catchment by Irish Water.
- Construction of an on-site pumping station and storage tank is required in order to store foul drainage flows from the development during heavy rainfall conditions / if the combined sewer network is under pressure. The on-site pump station is to be integrated within a 2,150 m³ balancing storage tank.
- Stored drainage flows are then returned to proposed 300 diameter combined sewer which outfalls from the site's eastern corner, towards northern end of Willow Grove and onwards along the verge adjacent to the N11 prior to discharge to manhole SO22257704 on the existing combined sewer network (approx. 240m from the eastern corner of the site). The proposed 300 diameter combined sewer also facilitates potential future upgrades of the wider Foxrock catchment by Irish Water.
- Detailed design of the pump station and 300 diameter combined sewer outfall noted above which will facilitate a foul drainage connection for the development is to be agreed with Irish Water at connection application stage

With respect to water supply, Irish Water's updated confirmation of feasibility letter advises that provision of a water connection is feasible subject to construction of a 40m long watermain between the site and an existing 9' watermain on Old Bray Road.

Based on the foregoing, it is submitted that the full requirements of the updated confirmation of feasibility letter dated 4 October 2021 have been incorporated into the proposed development. Accordingly, subject to the implementation of the design measures outlined above, the proposed connection to the Irish Water network can be facilitated at this time.

Please refer to the Response to ABP Opinion Items 1, 7 and 8 (attached to this letter) and the Infrastructure Design Report both prepared by DBFL Consulting Engineers for further details of the proposed water and wastewater design.

3.2 Height, Density & Design Strategy

Item 2 states:

Further consideration and/or justification of the documents as they relate to the height, density and design strategy proposed, in the context of the concerns expressed by the planning authority in their Opinion and at the pre-application consultation meeting. In this regard, the prospective applicant should satisfy themselves that the design strategy for the site as it relates to height and density provides the optimal architectural solution for this site and should submit a rationale/justification for the heights/density proposed. CGIs, visualisations and cross sections, as necessary, should be submitted which clearly show the relationship between the proposed development and existing development in the immediate and wider area and from strategic viewpoints along the N11, and which illustrates the topography of the area.

The proposed development shall have regard to inter alia, national policy including the National Planning Framework and Sustainable Urban Housing: Design Standards for New Apartments (2020)

and local planning policy, the site's context and locational attributes.

Furthermore, the applicant is advised that an appropriate statement in relation to section 8(1)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, that outlines consistency with the relevant Development Plan and that specifically addresses any matter that maybe considered to materially contravene the said Plan, if applicable, should be submitted.

3.2.1 Response Overview

The proposed development provides for a total of 419 no. units on a site area of 2.15 hectares which equates to a residential density of 195 units per hectare. The proposed development provides for building heights ranging from 2 to 12 no. storeys.

In summary, the proposed design approach responds to the context and character of the site, achieving a sustainable level of density that provides appropriate transitions from adjoining and surrounding development to enhance the character of the area and appropriately protect existing amenities. The proposed houses (2 storeys), Building D (setback 4 storeys rising to 5) and Building E (4 storeys) provide an appropriate transition from the existing village centre at Old Bray Road and Willow Grove to proposed higher density, taller elements along the Old Bray Road.

Building A, B and C front directly onto the N11 corridor which provides an opportunity for increased density and height given its width and urban character. Building height ascends in multiples of 3, stepping up from the east towards the west creating a legible, distinctive urban edge onto the N11. Building A is part 5, part 6 storey, rising to 12 storeys adjacent to the N11. Building B is part 5 storey rising to 9 storeys proximate to the N11 edge. Building C is predominantly 6 storeys height over a partial lower-ground floor below podium level.

It submitted that the buildings heights have been informed by the planning policy context and the planning history of the subject site. The Board's Direction on ABP-306225-19, which proposed similar building heights along the N11 and a higher density of 219 units per ha on the site, stated '*the Board was satisfied that the elevations of proposed Block A and Block B would be acceptable in terms of appearance and scale and would in terms of massing represent an appropriate sense of enclosure to the N11 corridor and would not seriously injure the visual amenities of adjoining properties or the visual amenities of the wider area. The proposed development would therefore be in accordance with the proper planning and sustainable development of the area*' [emphasis added]. The proposed scheme retains the overall scale and form considered acceptable by the Board, and includes some design refinement and improvements to Building A and omits the pavilion buildings between the buildings, to address specific design issues raised in the Inspector's Report.

The **Architectural Design Report** prepared by HJL Architects provides a detailed justification for the proposed approach to height, density and design strategy having regard to national planning policy and the site context. In this regard, Section 4.2.1 of the Report provides an overview of the response to Item 1. Section 5.1 provides a design rationale to the scale and massing and how the proposed development response to the opportunity of the N11 corridor while also ensuring a sympathetic interface with the established scale of the Village. Section 5.1 includes cross sections, both with adjoining properties and within the scheme, to demonstrate how to the proposed development responds to the existing context and protects existing and proposed residential amenity.

Appendix 4 of the Report comprises a Building Height Report which provides a comprehensive assessment of the proposed development having regard to the development management criteria identified in Section 3 of the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018), and as required by SPPR3. The Report concludes that the issue of appropriate building height has been carefully considered from the outset of the design process, with increased heights being carefully modulated and tested for impact. The result is a scheme that offers an exceptional level of residential amenity and an attractive visual landmark for Cornelscourt.

In addition, a **Landscape and Visual Impact Assessment** (LVIA) has been prepared by Mitchell + Associates and is submitted in respect of the proposed development (see Chapter 12 of the EIAR). The LVIA should be read in conjunction with the Computer Generated Images (CGIs) and Verified Views prepared by 3DDB. The impact of the proposed development has been assessed for a total of 37 no. views.

The Non Technical Summary (NTS) summarising the LVIA, notes that the design approach taken is both appropriate and entirely logical in the existing context, in that it proposes the location of the required higher rise elements close to the large scale N11. This will have two main positive attributes, namely, (1) it provides a landmark element adjacent to the N11 signifying Cornelscourt as a place (one of a number of such built and proposed 'events' along the N11 corridor) and (2) it provides a designed separation or 'bulwark' between the village area and the road. With respect to the design approach, the NTS notes that:

The proposed design incorporates reinforcement of the village functions, primarily through the provision of a building which specifically addresses the disused, 'derelict' gap site in the existing street (along the Old Bray Road) and which will provide opportunities for complementary commercial and social facilities. This building is an appropriately scaled new building within the village core which supports and confirms the status and viability of the village. The design also allows for a designed gradation from high rise at the road, down to lower scaled buildings at the village and approaching the existing adjacent residential properties. This stepping down nearer to the existing residential properties, successfully reduces the potential negative effects which could have accrued in respect of proximity and over-bearing. Open space is also created between the existing and the proposed residential buildings, which further accentuates this effect.

The LVIA acknowledges that the proposed development will create some significant landscape and visual impacts upon the existing landscape context. However, the NTS provides that *'the design successfully mitigates the majority of any resultant negative effects, whilst providing many positive effects, particularly in respect of the broader landscape character of the area and the improved social and cultural aspects provided by the proposed scheme'*.

3.2.2 Overview of the Policy Context for Increased Heights & Density

The proposed height and density are considered appropriate given the site context and align closely with national policy objectives and guidance. A summary of the planning policy context is provided below:

The **National Planning Framework** (NPF) is the Government's high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. The key emphasis of the NPF is to ensure balanced regional growth, the promotion of compact development and the need to avoid urban sprawl.

The NPF places an emphasis on the development of lands linked to existing infrastructure to ensure the sustainable development of Ireland's towns and cities. In particular, a key priority of the NPF is compact growth and the need to realise the potential of development areas within existing urban settlements. In this respect, the NPF provides that '*activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority*'.

Section 6.6 acknowledges that avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas. It goes on to state that:

'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.'

National Policy Objective (NPO) 35 specifically articulates the requirement for the delivery of higher density residential developments across the county. NPO 35 states:

'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'. [emphasis added]

To achieve the principles of compact urban development, it is necessary that opportunities for increased density within the existing Dublin Metropolitan Area should be maximised and availed of, as appropriate. The proposed development represents an efficient and sustainable use of zoned and serviced land and accords with the requirements to deliver new residential development in a sustainable manner within the Metropolitan Area.

National Policy Objective 13 (NPO 13) of the NPF advocates a move away from rigidly applied, blanket planning standards in relation to building design in favour of performance-based standards to ensure well-designed high-quality outcomes. In particular, the NPF general blanket restrictions on building height or building separation distance that may be specified in development plans should be replaced by performance criteria appropriate to location.

In this regard, it is considered that the subject site is capable of easily accommodating the proposed height proposed without giving rise to any significant adverse planning impacts in terms of daylight, sunlight, overlooking or visual impact. The Board has previously considered similar heights as acceptable in terms of appearance and scale and would represent an appropriate sense of enclosure to the N11 corridor. In this respect, it is considered that the height and density of the proposed development ensures the efficient use of available, serviced lands within the established urban area and accordingly will contribute positively towards achieving compact development, a priority of the NPF.

Both the NPF and the more recently published **Housing For All – A New Housing Plan for Ireland** (Housing for All) emphasise the pressing need for new housing, with the need for 25,000 new units per annum nationally referenced in the NPF increased to 33,000 per annum in Housing for All, in order to meet future population growth and current demand. Supply in 2020 and 2021 has fallen substantially short of national requirements, requiring an acceleration in supply. The proposal for 419 no. units is of a scale that will meaningfully contribute to achieving the goals of the NPF and Housing for All.

The **Regional Spatial and Economic Strategy** (RSES) for the Eastern and Midland Region is underpinned by the Key Principle of Healthy Placemaking *'to promote people's quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in'*. Furthermore, the integration of transport and land use is promoted, as well as the better use of under-utilised land within the existing built-up urban footprint, focused on a sequential approach to development.

The RSES emphasise the need for compact and sustainable development in accordance with the NPF to accommodate projected population growth in the Region.

Cornelscourt forms part of the Dublin City and Suburbs, as identified in the RSES Settlement Strategy. In this respect, Regional Policy Objective RPO 4.3 seeks to *'support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area and ensure that the development of future development areas is co-ordinated with the delivery of key water and public transport infrastructure'* [emphasis added].

The RSES includes a detailed planning and investment framework as set out in the Dublin Metropolitan Area Strategic Plan (MASP). Central to the vision and spatial framework of the MASP is the consolidation of Dublin city and suburbs. To achieve the overall vision the MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area are identified including:

Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.
[Emphasis added]

The proposed development will deliver a high quality BTR scheme of modern and adaptable new homes, on an infill, brownfield site that is well served by public transport provision and local service provision. This is in accordance with the principles and vision of the MASP to increase density within the existing built-up area of Dublin City suburbs.

The **Sustainable Residential Development in Urban Areas Guidelines, 2009** (SRDUA Guidelines) contain specific policies and objectives in relation to the scale and location of new residential development, the need for high quality design of residential areas and the use and development of infill, greenfield and brownfield sites.

Chapter 5 of the SRDUA Guidelines identifies opportunities for increased residential densities on brownfield lands and particularly where such sites are *'close to existing or future public transport corridors, the opportunity for their re-development to higher densities, subject to the safeguards expressed above or in accordance with local area plans, should be promoted, as should the potential for car-free developments at these locations.'*

Paragraph 5.8 of the guidance identifies Public Transport Corridors as suitable locations for higher density development. The guidance advises that *'Walking distances from public transport nodes (e.g. stations / halts / bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station. The capacity of public transport (e.g. the number of train services during peak*

hours) should also be taken into consideration in considering appropriate densities.'

The guidance does not advocate a maximum permissible density for such locations and that minimum net densities of 50 dwellings per hectare should be achieved in such locations, subject to appropriate design and amenity standards. It goes on to state that *'the highest densities being located at rail stations / bus stops and decreasing with distance away from such nodes.'*

The subject site is located within an established suburban village immediately adjacent to the N11, a two-way dual carriageway road with a bus lane in both directions with a cycle track immediately adjacent to the bus lane, in both directions. The subject site benefits from excellent public transport accessibility levels. Dublin Bus and Go Ahead operate a number of routes that serve the subject site providing links to/from Dublin City Centre and to other key destinations in the Dun Laoghaire –Rathdown County. The proposed development seeks to balance the scale of the site, its proximity to a high-quality public transport corridor, the established scale of the surrounding urban form and the established social and community facilities of Cornelscourt.

The proposed density is in accordance with the general policies and guidance provided in the SRDUA Guidelines, particularly in relation to maximising investment in public transportation infrastructure, the creation of a definitive urban edge to the N11, the consolidation of the urban area, and the provision of a high-quality development. The proposed development represents a sustainable response to a strategic infill site within an established suburban village and has been carefully designed to provide an appropriate relationship and interface with the adjoining development to the east and south.

The **Sustainable Urban Housing: Design Standards for New Apartments 2020** (Apartment Guidelines) builds upon and updates the 2015 guidelines based on current and predicted future housing requirements in Ireland. The Apartment Guidelines take into account the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040, and the National Planning Framework, published since the 2015 Guidelines.

The Apartment Guidelines seek to promote the delivery of sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes. The Guidelines recognise the need for greater flexibility in terms of building height and building separation distances to achieve increased apartment development within established urban areas.

Section 2.4 of the Guidelines identify a range of locations in cities and towns that may be suitable for apartment development, and therefore increased densities. Intermediate urban locations are defined as sites within or close to i.e., within reasonable walking distance (i.e., up to 10 minutes or 800-1,000m), of principal town or suburban centre or sites within easy walking distance (i.e., up to 5 minutes or 400-500m) of reasonably frequent (min 15-minute peak hour frequency) urban bus services. Such intermediate locations are considered *'generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly*

Section 5 of the Guidelines provide specific guidance on the emerging 'Build to Rent' (BTR) sector and notes that such schemes have a role in providing choice and flexibility to people in supporting economic growth and access to jobs in Ireland. Specifically, the Guidelines identify the potential of BTR schemes

'to accelerate the delivery of new housing at a significantly greater scale than at present' as a key aspect of the development model.

The **Urban Development and Building Heights – Guidelines for Planning Authorities Guidelines 2018** (Building Height Guidelines) similarly emphasise the need for urban consolidation, intensification and densification of brownfield development land as required by the NPF. The Guidelines identify a key objective of the NPF is to '*see that greatly increased levels of residential development in our urban centres and significant increases in the buildings heights and density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels*'.

Section 3.1 of the Building Height Guidelines state that it is Government policy that building heights must be generally increased in appropriate urban locations and therefore there is a presumption in favour of buildings of increased height in our towns/city cores and other urban locations with good public transport accessibility. As a broad principle, the Guidelines provide that proposal for buildings taller than prevailing building heights will be considered where they positively assist in securing National Planning Framework objectives of focusing development in key urban centres; fulfil targets relating to brownfield, infill development supporting compact growth in urban centres; and, increase residential density and unit numbers, including student accommodation, in core areas and inner suburbs.

The proposed development proposes the intensification and consolidation of a brownfield, suburban site located with an established village core and proximate to high-capacity public transportation links. The height, massing and scale of the proposed development have afforded due regard to the existing surrounding context, the need to protect surrounding residential amenity, prevailing heights, and the need to provide sustainable densities at accessible, infill, suburban locations.

Section 3.2 of the Building Height Guidance state that '*In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the following criteria...*'. The Building Height Guidelines then specify a range of criteria to be addressed where proposed building height exceeds that specified in a Development Plan (SPPR 3). These are specified at a macro level (at the scale of the relevant city/town); intermediate level (at the scale of district/ neighbourhood/ street); and, at a micro level (at the scale of the site/building) need. These criteria have been addressed in Appendix 4 of the Architectural Design Report prepared by HJL Architects and also in summary in the Material Contravention Statement which accompanies this application.

The proposed development is consistent with the overall objectives of the Guidelines to maximise the opportunity of a centrally and accessible urban site at a sustainable density that is considered necessary to facilitate urban consolidation objectives and to achieve compact growth.

The Sustainable Communities Strategy contained in the **Dun Laoghaire Rathdown County Development Plan 2016-2022** (the Development Plan) seeks to increase housing supply, ensure an appropriate mix, type and range of housing and promote the development of balanced sustainable communities.

Cornelscourt is identified as a 'Secondary Centre' in the Development Plan Core Strategy and sits at the second tier of the settlement hierarchy below the 'Major Centre' settlements of Dun Laoghaire and Dundrum. Section 1.2.5.1 of the Development Plan notes that a key strand of the overall Settlement

Strategy focuses on the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban/ suburban built form – and thereby maximising efficiencies from already established physical and social infrastructure, subject to the provision of necessary water and transportation services.

Policy RES3 of the Development Plan specifically provides that *'it is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of areas, with the need to provide for sustainable residential development'*. In determining appropriate residential density, the Policy RES3 provides that regard should be given to national planning policy guidance including the Sustainable Residential Development in Urban Areas (2009) and its companion document Urban Design Manual. Densities in excess of 50 units per hectare are encouraged proximate to public transport corridors. Policy RES4 seeks *'to densify existing built-up areas, having due regard to the amenities of existing established residential communities'*.

The Development Plan acknowledges that *'consolidation through sustainable higher densities allows for a more compact urban form that more readily supports an integrated public transport system. This has the potential to reduce the urban and carbon footprint of the County'*. Accordingly, the Development Plan is supportive of the overarching principles of National Policy including increased densities, compact urban development and preventing urban sprawl.

It is considered that building heights are intrinsically linked to density. Appendix 9 of the Development Plan contains a Building Height Strategy for the County. The aim of the Building Height Strategy is to ensure the protection of the built heritage of the County and general residential amenities while encouraging higher densities of quality where appropriate in accordance with national legislation.

The Building Height Strategy identifies that approximately 75% of the County's area is subjected to either explicit or implicit building height policy. The subject site is not located within a designated area or within an area where specific height controls are in place. Of note, the N11 corridor is identified as a location where heights greater than six storeys have been permitted. Section 3.3 of the Building Height Strategy notes that:

'The N11, owing to its width, strategic importance, and public transport facilities, has the potential to become an attractive urban corridor enclosed by taller buildings of high quality, at locations which are also proximate to social and community infrastructure.'

'The N11 corridor has seen a pattern of taller apartment schemes constructed at key corner sites along its route through the County. As such schemes are restricted from taking access directly from the N11, corner sites at junctions between the N11 and the larger side roads have been the most common location for intensification of development. These developments have tended to range from 3 to 7 storeys. The width of the corridor, at over 40 metres, provides an opportunity for taller buildings to enclose this space.'

'The higher residential densities that have been realised in this area in the last few years were as a result of policies in the 2004 County Development Plan which promoted higher densities within a 500 metre catchment of a QBC and also allowed for consideration of higher densities on large development sites, in excess of 0.5ha.' [emphasis added]

Despite the inherent potential of the N11 corridor to accommodate additional height, as acknowledge in the Building Height Strategy, the Strategy restricts height to a maximum 3-4 storeys, with upward modification to 5-6 storeys. It is considered that this approach is no longer consistent with national policy, as outlined above.

Notwithstanding, the Development Plan is committed to consolidated growth within the Metropolitan area, densities in accordance with the SRDUA Guidelines, and the promotion of higher residential densities within walking distance of public transport corridors.

The **Draft Dun Laoghaire-Rathdown County Development Plan, 2022-2028** (the Draft Plan) provides for the delivery of a compact growth agenda which requires increased focus on re-using previously developed 'brownfield' land, supporting the appropriate development of infill sites, and the re-use or intensification of existing sites.

Policy Objective PHP1 seeks to increase the delivery of housing throughout the county, consistent with the requirements of the NPF and RSES, and embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods. Policy Objective PHP4 seeks to implement a strategy for residential development based on a concept of sustainable urban villages and promote and facilitate the provision of '10-minute' neighbourhoods.

Policy Objective PHP18¹ relates to residential density and provides that it is a Policy Objective to:

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

The Draft Plan seeks to maximise the use of zoned and serviced residential land. Consolidation through sustainable higher densities allows for a more compact urban growth that, in turn, more readily supports an integrated public transport system. This together with the '10-minute' neighbourhood concept, has the potential to reduce the urban and carbon footprint of the County.

The proposed development provides for the sustainable development of a vacant site within an established suburban village, with a range of social infrastructure and amenities within easy walking distance, consistent with the sustainable urban village concept advocated under Policy Objective PHP4. The proposed development facilitates consolidation of the existing Dublin City suburbs through sustainable higher densities for more compact urban growth as per Policy Objective PHP18.

With regard to building height, the Draft Plan sets out the council policy in the Building Height Strategy (BHS) (Appendix 5). Of relevance to the subject site is Policy Objective BHS 1 which provides:

*It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and **Cornelscourt**, within the Sandyford UFP area, UCD and*

¹ Policy Objective PHP18 quoted as per Material Amendments to the Draft Plan (indicated in red text) as published 11 November 2021

in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NPO 35, SPPR 1& 3).' [Emphasis added]

It is considered that the proposed building heights are consistent with Policy Objective BHS 1 which specifically identifies Cornelscourt as an appropriate location for the consideration of increased heights and taller buildings. Table 5.1 of the BHS also contains a detailed set of performance-based criteria for the assessment of height so as to ensure protection of the unique amenities of the County whilst also allowing increased height. This table is largely based on the development management criteria identified in Section 3.1 of the Building Height Guidelines. Appendix C of the Planning Report and Statement of Consistency submitted herewith details where an assessment of the proposed development having regard to the Table 5.1 criteria has been submitted as part of this application.

Based on the foregoing, it is considered that the design approach to building height and density at the subject site is consistent with the provisions of the Draft Plan.

3.2.3 Reasonable Basis for the Proposed Height & Density

It is submitted that the sustainable consolidation and intensification of development lands accessible to public transportation links is in accordance with the strategic and national policy parameters set out in the NPF. RPO 4.3 of the RSES's specifically reference the need for consolidation and re-intensification of infill/brownfield sites and higher densities within the existing built-up area of Dublin City and Suburbs.

The proposed density of 195 no. units per hectare is in accordance with the general policies and guidance provided in the SRDUA Guidelines, particularly in relation to maximising investment in public transportation infrastructure, consolidation of the urban area and the efficient use of infill/brownfield sites. The proposed development provides for increased density, offering a housing type, size and tenure that is not prevalent in the area and responds directly to emerging demographics, in accordance with both the Building Height and Apartment Guidelines, and in a manner that respects the existing character of the area and protects residential amenity.

With regard to building height, recent national policy and guidance clearly articulate a move away from rigidly applied, blanket planning standards in relation to building design in favour of performance-based standards. The NPF seeks to prioritise compact growth acknowledging the need to build inwards and upwards. The Building Height Guidelines put in place a criteria-based framework to facilitate the delivery of increased building height at appropriate location in order to facilitate the NPF objectives of urban consolidation and compact growth.

The Development Plan supports the consolidation and densification of the existing suburban built form and the need for higher residential densities for compact growth that integrates with public transport. Significantly, the Building Height Strategy identifies the N11 corridor as of 'strategic importance' with capacity for taller buildings to appropriately address and enclose the wide corridor. Notwithstanding, the building height restrictions put in place by the Development Plan do not allow for the delivery of

buildings in excess of 6 storeys. Accordingly, while Buildings C², D, E and the proposed houses are generally consistent with the limitations set by the Building Height Strategy, the taller elements comprising Buildings A and B exceed the building height limits set out in the Development Plan. A Material Contravention Statement accompanies this application which demonstrates the proposed height satisfies the requirements of Section 37(2)(b) of the Act of 2000 and can be granted permission.

The proposed development provides for the sustainable development of a vacant site within an established suburban village, with a range of social infrastructure and amenities within easy walking distance, consistent with the sustainable urban village concept advocated in the Draft Development Plan. The proposed development facilitates consolidation of the existing Dublin City suburbs through sustainable higher densities for more compact urban growth as per Policy Objective PHP 18 in a manner consistent with the Draft Building Height Strategy.

It is submitted that proposed development represents the sustainable use of a substantial infill site which will consolidate the existing settlement of Cornelscourt, supporting local services and facilities and densifying the suburban area. As outlined in the Architectural Design Statement submitted herewith the height, massing and scale of the proposed development have afforded due regard to the existing surrounding context, the need to protect surrounding residential amenity, prevailing heights, and the need to provide sustainable densities at accessible, infill, suburban locations.

It is considered that the proposed development is consistent with the objective of the national policy Guidelines to maximise the opportunity of a suburban, accessible site at sustainable densities necessary to facilitate the compact growth of the urban area. On this basis, it is considered that the proposed density of 195 no. units per hectare is appropriate having regard to guidelines issued under section 28 of the Act, and with the overriding objectives of the Dun Laoghaire Rathdown Development Plan to increase residential density along high-capacity transport corridors and existing urban centres.

3.3 Materials Strategy

Item 3 states:

A Materials Strategy that specifically addresses the proposed materials and finishes for buildings, open spaces, paved areas and boundaries, having regard to the requirement to provide high quality and sustainable finishes and details. This strategy shall include details of the colour, tone and texture of materials and the modelling and profiling of the materials (including any cladding or framework system) on each block. Particular attention is required in the context of the strategic location and visibility of the site and to the long term management and maintenance of the proposed development. A Building Lifecycle report should also be submitted in this regard, which includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2020 Guidelines on Design Standards for New Apartments.

The material palette for the buildings 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 complement and enhance the soft landscape and to create a scheme that is pleasant

² Building C presents as a 6 storey building over podium level. Part of the building benefits from a lower ground level, below podium level, and according Building C is partially 7 storeys over lower ground level.

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 language in the form of a formal piers infilled with expansive glazing.

High-quality brickwork is proposed on the external facades with large brick frames enclosing the southern facades. The articulation of brickwork and facade composition accentuates an expression of verticality. The height of the gable ends, and the use of darker brick visually reduces the mass of the elements while also creating a more appropriate integration within the central gardens.

In the taller elements, Buildings A, B, and C along the N11 corridor, the façade is composed of a curtain walling glazing system with selected pale brick cladding. This facade is framed by vertical brick piers to establish a strong sense of verticality, slenderness and richness to the scheme.

The use of highly specified, robust factory finished windows and doors, and glass and steel balustrade balconies will also reduce ongoing maintenance costs.

The selected materials will help create a building that resists deterioration, and which is easily maintained and managed. 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.

Full details of the material strategy for the proposed buildings have been provided in the **Architectural Design Report** prepared by HJL Architects.

With regard to the proposed hardscape palette will contribute to defining the character of the spaces between buildings, public open space (included into the Taking in Charge area), communal open spaces and private spaces. The changes in hard surface material will help to demarcate the use of the areas such as sitting and relaxing space, play areas and shared surface. The distinction of different tones and finishes of paving, which includes natural stone paving, clay brick paving and concrete block paving, have been strongly related to future uses of the proposed shared surface, cycle path and pedestrian routes. The proposed materials will be appropriate and sympathetic to the local character of the area and be an integral part of the design.

Careful consideration has been given to the design, texture and colour of the materials to ensure they will integrate with the design, in particular with a strong tonality cohesion with the proposed building facade finishes, which will assist in providing a high-quality living environment. All the landscaping materials will have a good resistance to accidental damage and low maintenance characteristics.

For full details of the open space hardscape material strategy please refer to the **Landscape Design: Hardscape Strategy** prepared by Cameo and Partners.

With regard to boundary treatment, the site will have a high level of permeability and accessibility for all through the introduction of pedestrian and cycle links into the site and through careful consideration of the openings along the site boundary, which will enhance legibility in the area and will emphasise the visual character of the development. Where possible, the boundary treatment will replicate the existing pattern and material (i.e., boundary along the N11) which is characteristic of the immediate locality.

For full details of the boundary treatment strategy please refer to the **Landscape Design Statement**

prepared by Cameo and Patterns and associated Dwg. Nos. C0126 L400 to L402.

A **Building Life Cycle Report** has been prepared by Aramark and submitted herewith.

3.4 Residential Amenity

Item 4 states:

'A report which address existing and future residential amenity and which includes matters such as daylight/sunlight analysis, micro-climate/wind impacts and noise impacts, together with proposals to address any such impacts, if necessary. A Daylight/Sunlight analysis, showing an acceptable level of residential amenity for future occupiers and neighbours of the proposed development, should include details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. A month-by-month assessment of average daylight hours within the public open space should be provided within the Daylight and Sunlight Analysis document to allow for a full understanding of the year round level of overshadowing of the primary outdoor recreation areas for the development should be submitted. This report should address the full extent of requirements of BRE209/BS2011, as applicable'

The design process was an iterative process whereby revisions were rigorously tested in respect of daylight/sunlight impact, and micro-climatic effects including wind and noise. Where appropriate, design modifications have been introduced to the proposed scheme to avoid or minimise potential impacts on existing and future residential amenity.

Given the complexity of the scheme, and the technical nature of the analysis undertaken, each of the assessments have been presented as separate documents. In this regard, a Daylight and Sunlight Assessment Report has been prepared by 3DDB and submitted as a standalone Report. A Noise Impact Assessment and Micro-Climatic and Wind Impact Assessment have been undertaken by AWN Consulting and IES, respectively, and are included in the EIAR. A summary of the principal findings is outlined below:

The **Daylight & Sunlight Assessment Report** which accompanies this application has been prepared in accordance with the BRE Guidelines. The Report assessed the impact of the proposed development on established residential properties within the neighbouring area. The existing buildings were assessed for Vertical Sky Component (VSC), a measure of potential daylight, and where relevant an Annual Probable Daylight Hours (APSH), including Winder Study (WPSH), a measure of direct sunlight. An assessment of the effect on levels of sunlight in existing gardens was also undertaken.

For the study of effect to VSC, 96% of the assessed windows (200 no. of 209 no. windows assessed) were found to be compliant with the BRE Guidelines. For the remaining 9 no. windows, the assessment determined that the effect was 'not significant' on the properties assessed. With respect to both APSH and WPSH, all windows assessed (44 no.) met the BRE Guidelines and therefore the effect was considered to be 'imperceptible'. The Report also determined that all of the adjoining gardens assessed (30 no.) would experience an 'imperceptible' effect to their levels of sunlight as a result of the proposed development as they meet criteria as set out in the BRE Guidelines.

As detailed in Section 3.2 above and the Planning Report and Statement of Consistency submitted with

the application, the site represents an infill suburban consolidation site located within an established village proximate to a high-quality public transport corridor. The physical and policy context of the site also mandates a sustainable level of development. It is submitted that the impact on adjoining residential amenities by reason of daylight, sunlight and overshadowing effect has been assessed and generally determined to be 'negligible' or consistent with the BRE Guideline criteria, with a 'not significant' effect, in terms of VSC, for a small number of windows assessed. It is considered that Report demonstrates a high level of compliance with the BRE Guidelines, and the level of impact envisaged is appropriate and acceptable given the sites context.

The Report includes an assessment of the wider landscape setting, including the areas specifically identified for communal open space, for the levels of sunlight achieved across the scheme. All of the amenity areas assessed meet the BRE Guidelines requirements, receiving significant levels of sunlight on March 21st. The landscape areas, taken as a whole, achieved sunlight available of 90.3% of the area receiving more than two hours of daylight on March 21st, significantly more than the BRE minimum of 50%. It is noted that a portion of the proposed Tenant Amenity/Community Hub does not achieve the BRE sunlight penetration standard of 50% for March 21st. This space, and other incidental spaces which do not achieve the required target, has been discounted from quantitative communal open space calculations (see Section 3.4.1 below) to ensure that communal open space requirements are met when only amenity space which benefits from high levels of sunlight are considered.

As requested in Item 4, an additional study of average sun hours within the public spaces has been carried out on a month-by-month basis. The monthly assessment determines that summer months will receive excellent levels of sunlight with the months of April to August receiving on average 6+ hours of sunlight within the majority of assessed areas. Unsurprisingly, the winter months of November to January will receive the lowest levels of sunlight. It is noted that the Tenant Amenity/Community Hub and Creche areas are expected to receive less than 15 minutes of sunlight over these months. However, the balance of the areas assessed do considerably better with an average expected sunlight levels ranging from 45m to 2 hours over the same period, providing ample opportunity for outdoor recreation and play within the scheme as appropriate.

With regard to internal amenity of the proposed residential development, the Average Daylight Factor (ADF) received in habitable rooms has been assessed for the lowest habitable floors of each of the residential blocks. These findings have then been extrapolated across the upper floors, testing until units that fail on lower floors meet or exceed the target values on upper floors, to provide a circa compliance rate across the scheme.

The analysis determined an approximate compliance rate of ~97% of rooms that were in excess of the prescribed ADF guidelines as set out in the Report. The vast majority of spaces were determined to comfortably exceed the value. All bedrooms met the 1% target value as set out in the BRE Guidelines. A total of 34 no. living/kitchen/dining (LKD) spaces are envisaged to not fully achieve the 2% target value which applies to kitchens. Of these only 4 no. LKD spaces are considered not meet the 1.5% target value which applies to living rooms. The proposed development achieves a circa compliance rate of 99.6% if the 1.5% (living room) rate was applied to all LKD spaces.

Substandard daylighting performance was avoided wherever viable and practical by maximising glazing, adjusting position of windows, amendments to internal layouts and offsetting/repositioning balcony structures to maximise natural light availability. In terms of compensatory measures, all units benefit

from a balcony, which in some cases have impacted on the ability of the LKD to achieve the target values. All units have access to an internal amenity space from within the respective blocks. The proposed external amenity spaces, and in particular the designated communal open space all benefit from excellent levels of sunlight. Furthermore, the generous level of communal amenity space provision will ensure a high level of amenity for future residents within the scheme.

It is submitted that the overall level of compliance achieved on the site, both in terms of existing future impacts, is very high and the level of impact envisaged is appropriate and acceptable given the sites context.

The **Wind & Microclimate Assessment** (see Chapter 11 of the EIAR) used the Lawson's Pedestrian Comfort and Safety criteria to test the suitability of the various locations on the site for their purposes. The criteria consider activities in terms of 'sitting', 'standing', 'leisure walking' and 'business walking'. The first two categories are used for locations like amenity spaces including balconies, terraces, gardens and outdoor seating areas of hospitality venues. The latter criteria are applied to courtyard pathways, exercise tracks, and thoroughfare paths for accessing various buildings on the site. These criteria recommend that the site be designed in such a way that the wind is not allowed to reach speed exceeding about 4m/s for 'sitting' to 10m/s for 'business walking', for more than 95% of the year.

Dublin exhibits predominantly south-westerly and westerly winds. The median wind speed for Dublin is around 5m/s, i.e., for 50% of the year wind speed exceeds 5m/s. Therefore, from outset the challenge, from wind comfort point of view, is to reduce wind speeds in amenity spaces to one tenth of their frequency of the occurrence of over 5m/s.

The assessment established that the majority of areas – balconies and outdoor seating areas – showed a high level of compliance with the standing with the sitting comfort criteria. There were a small number of discrete locations where sitting comfort criteria were exceeded, including parts of the western and northern edges of the central open space, the area in the vicinity of the multi-function pavilion and a small proportion of balconies on Buildings A, B and C.

However, in all cases, whenever the wind speed at the above locations exceeded 4m/s for more than 5% of the year i.e., exceeded the threshold for the Lawson's Sitting Comfort Criterion, it was also less than 6m/s for more than 95% of the year i.e., fully compliant with threshold for the Lawson's Standing Comfort Criterion. Hence, any exceedance noted for the Lawson's Sitting Comfort Criterion can be considered marginal and it will not lead to an environment which is unpleasant to use for amenity and recreational purposes.

The local air speed is only going to be greater than a gentle breeze, but most frequently less than a moderate breeze. Such conditions are unlikely to have any impact on usability of these locations as amenity spaces. The environment on these locations will be typical of, and consistent with, any other location on and around buildings of a similar scale and design, in the Dublin area.

The site showed excellent compliance with the Lawson's Safety Criteria for the normal and sensitive pedestrians.

In general, the wind microclimate of the site as proposed can be considered as suitable for the intended purposes. The proposed development has incorporated design features that reduce the effect of wind, ensure the use of public and private amenity spaces is comfortable and safe.

Please refer to the Chapter 11 of the EIAR for further details on wind and microclimate impacts.

The **Noise Impact Assessment** (see Chapter 9 of the EIAR) considers both outward impact of the proposed development on the surrounding environment and inward impacts of proposed development on the proposed residential dwellings.

During the operational phase, the outward noise impact to the surrounding environment will be limited to any additional traffic on surrounding roads and plant noise from the commercial buildings as part of the development. The Assessment concludes that additional traffic from the proposed development will have an insignificant impact on the surrounding noise environment. The operational plant noise from the development will be designed to ensure the prevailing background noise environment is not increased by a significant level and so potential adverse noise impacts are avoided.

The potential for inward noise impact on the proposed development has also been assessed. The assessment was carried out with reference to the guidance contained in Professional Practice Guidance on Planning & Noise (ProPG), BS 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings (BSI); and the local and national Noise Action Plans relevant to the area. The assessment has identified facades where upgraded acoustic glazing and ventilation will be required. In this respect, enhanced acoustic specifications (glazing and ventilation) is proposed where necessary to ensure that internal noise levels are within acceptable limits.

With respect to external noise levels for amenity areas in the development, ProPG provides that *'the acoustic environment of external amenity areas that are an intrinsic part of the overall design should always be assessed and noise levels should ideally not be above the range 50 – 55 dB L_{Aeq,16hr}'*. The ProPG go on to state that *'these guideline values may not be achievable in all circumstances where development might be desirable. In such a situation, development should be designed to achieve the lowest practicable noise levels in these external amenity spaces'*.

The design of the external spaces has taken cognisance of potential of noise from the N11 impacting on the development. In this respect, the proposed communal areas located at podium level are positioned higher than the N11 which eliminates line of site to the road and therefore reduces noise impacts on external areas. In addition, a range of design features have been introduced to reduce potential impacts including the provision of glazed balustrades at podium level (also functioning as a safety feature) and the continuation of the existing random rubble wall at Meadow Grove (boundary with N11) before returning to meet the façade of Building C.

Accordingly, the assessment finds that external noise levels within the vast majority of the communal open space is within the recommended range of noise levels from ProPG of between 50 – 55 dB L_{Aeq,16hr}. Typically, at areas closer to the N11 noise levels will be higher, however the extent of communal open space exceeding 55 dB L_{Aeq,16hr} has been minimised where possible (less than 15.6% of total communal open space provided) to achieve the lowest practicable noise levels at these locations and ensure the creation of comfortable, quiet amenity spaces. In this respect, and given the quantum of communal open space proposed, well in excess of the minimum quantitative standard provided within the 2020 Apartment Guidelines, the noise assessment considered that no further mitigation is required to control external noise levels across amenity areas.

Please refer to the Chapter 9 of the EIAR for further details on wind and microclimate impacts.

3.4.1 Incorporation of Proposals to Address Residential Amenity Impacts

Micro climatic assessments including wind and daylight and sunlight assessments were undertaken as part of an iterative process to identify areas that require further refinement either by way of adjusting façade and balcony design. Glazed balconies have been typically provided on the two upper floors of taller elements and the upper floor of lower buildings. Glazed balconies have also been provided all levels, with winter gardens for the upper two floors, on the façade fronting onto the N11. Important design interventions were introduced in order to ensure a favourable outcome in terms of internal daylight values. These design changes included amendments to internal walls, room configuration, window sizes, additional windows where necessary, and adjustment of position of balconies whilst maintaining the design integrity of the scheme.

The omission of balconies was considered for the LKD spaces which did not fully achieve the 2% ADF target value which applies to kitchens. As demonstrated in the Daylight and Sunlight Assessment Results, the omission of balconies of units in Block A which did not achieve 2% would provide sufficient improvement to daylight levels to achieve full compliance with the recommended minimum values. Such an approach would be consistent with SPPR 8 of the Apartment Guidelines which allows for flexibility in the provision of private open space in BTR schemes. Notwithstanding, it was considered that the provision of a balcony serving every unit would provide a higher level of amenity for future occupants than improved ADF. Accordingly, it was considered appropriate for the balconies to remain in place, particularly given the high level of compliance with 1.5% ADF target value.

Enhanced glazing and ventilation have been incorporated into the proposed development in accordance with the specification identified in the Noise Impact Assessment (Chapter 9 of the EIAR).

The massing of Block D was carefully considered to minimise sunlight and daylight impacts on adjoining properties and to maximise the level of sunlight to the central communal open space. In reviewing the relationship of the perimeter housing to the Willow Grove properties, a mono-pitched roofline has been incorporated into the housing, stepping down towards the boundary between the properties and the inclusion of a tall, narrow window on the stair landing to the rear of the houses to create a more domestic appearance along the eastern boundary edge.

The proposed hard and soft landscaping measures were further considered to ensure the landscape strategy fully responded to analysis undertaken and delivered high quality open space for future residents and a seamless integration with the existing public realm. Where appropriate design features have been introduced into the scheme to avoid or minimise potential amenity impacts. In this respect, formal seating areas in the communal open space are proposed at locations which meet sitting comfort criteria.

Landscape features including boundary treatments, glass balustrade at podium level, the continuation of the random rubble wall onto the N11 as described above have been introduced to minimise noise impacts. Furthermore, no noise sensitive features such as formal seating or children play areas are proposed within the limited areas which exceed 55 dB $L_{Aeq,16hr}$. The communal open space to the north-east of Building C has been designed as a breakout space associated with the adjoining gym. It is considered that this active recreational space, with a functional relationship with the gym, is considered appropriate at this location.

Furthermore, only areas of open space which fully meet the BRE recommended 2-hour sunlight access

on the 21st of March for its entire area have been included within the communal open space calculation. When only the communal open space which exceeds the BRE Guidance is taken into account, the resulting area of communal open space (4,703sqm) still significantly exceeds the minimum quantitative standard provided within the 2020 Apartment Guidelines (2,372sqm).

In addition, the proposed apartments have been designed to ensure a high level of residential amenity. All units benefit from generous private amenity space in the form of balconies on upper floors, terraced areas on ground and lower ground floor units and rear gardens for the houses (noting the SPPR 8(ii) of the Apartment Guidelines provides for flexibility on the provision of private amenity space for BTR schemes). Some 85% of the units exceed minimum standards by 8.8% or more. Internal community amenity spaces have been provided within each block and offer a range of flexible spaces to meet future residents' requirements. High quality communal open space has been provided at more than twice the required rate and provides a range of active and passive recreational opportunities. Accordingly, it is submitted that the proposed development will result in a high level of amenity, both within the individual unit and the communal areas, to meet the needs of future residents and contribute to the delivery of a residential scheme of exceptional standard.

3.5 Housing Quality Assessment

Item 5 states:

A housing quality assessment which provides specific information regarding the proposed apartments and which demonstrates compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements. This should also include a schedule of floor areas for all proposed units, clearly setting out the aspect (single, dual, triple) of each unit. A drawing clearly indicating units considered to be dual aspect should also be submitted.

A **Housing Quality Assessment** (HQA) has been prepared by HJL Architects and is attached at Appendix 2 of the Architectural Design Statement. The HQA demonstrates that the proposed development is fully consistent with the development standards as provided for in Apartment Guidelines.

The **Planning Report and Statement of Consistency**, prepared by DBCL, provides a full assessment of the proposed development of the proposed development with regard to the Apartment Guidelines, including specific reference to its specific planning policy requirements (SPPRs).

Dual Aspect Apartments have been identified on the HQA. In addition, a **Dual Aspect Analysis Report** (Appendix 3 of the Architectural Design Report) prepared by HJL Architects provides a detailed analysis of typical dual aspect units. A full set of plans identifying the dual aspect apartments have been included in the Dual Aspect Analysis Report.

The proposed development will provide a very high level of residential amenity for future occupants, exceeding in many instances the requirements of the Guidelines for BTR schemes, and has been designed to be fully consistent with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments 2020.

3.6 Landscape Plan

Item 6 states:

A detailed landscaping plan for the site which clearly differentiates between areas of public, communal and private open space and which details exact figures for same. Details should also include proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable and available for all. Pedestrian permeability through the site should be outlined. Details of the interface between private, public and communal areas should also be detailed. Additional cross sections, CGIs and visualisations should be included in this regard.

A detailed landscaping plan has been prepared for the proposed scheme by Cameo and Partners, Landscape Architects (see Cameo Dwg. Nos C0126 L099 to L110). Hardscape and softscape plans, illustrative plans, diagrams and sections all support the landscape plan being proposed.

Further details of the landscaping strategy and a response to the issues raised under Item 6 are included in the **Landscape Design Statement** and the **Landscape Design Hardscape Strategy** prepared by Cameo & Partners and the accompanying drawings.

With reference to the breakdown between public, communal and private open space, it is noted that Section 8.2.8.2 of the Development Plan defines 'public' open space for compliance with open space standards as '*all areas of open space within a new development (be that public (taken in charge), communal, semi-private or otherwise) that is accessible by all residents/ employees of the development and in certain cases may be accessible by the wider general public.*'

Details of the breakdown of public, communal and private open spaces are illustrated and described in the Landscape Design and Access Statement. Publicly accessible open space is limited to the interface with the Old Bray Road to the south-west and the N11 pedestrian route to the north.

The proposed development provides a generous landscape setting which contributes to the overall amenity and aesthetic of the scheme. However, not all of it is directly useable. Some 7,078sqm comprises 'connective tissue', tying the entire development together as one cohesive masterplan. A total of 4,703 sqm has been designated as high quality, usable communal open space which will provide attractive, functional open spaces for future residents. It is noted that the communal open space figure excludes incidental spaces, heavily planted areas, dedicated pathways and shaded areas (which will achieve less than 2 hours daylight on March 21st). The communal open space will be accessible to the wider public facilitating permeability to the north and east, however its design will naturally discourage access to certain spaces to enhance the amenity value for residents.

Private open space is provided for the childcare facility (163sqm) and the rear gardens provided for the houses (990sqm in total). All of apartment benefit from their own private amenity space in the form of balconies or terraces.

Figure 3.1 Breakdown of Public, Communal and Private Open Space

Details of both the softscape and hardscape strategy are included in the Landscape Design Statement and in Dwg. Nos. C0126L200 and L300. Further details of the hardscape strategy are provided in the Landscape Design Hardscape Strategy produced by Cameo and Partners. Details of the street furniture strategy is included in the Landscape Design and Access Statement. Furniture and features have been carefully selected and located to enhance the space without creating clutter or limiting accessibility.

The Landscape Design Statement includes details of barrier free design and illustrates available routes to provide access for all. The use of steps has been minimised. Where necessary, alternative universal access routes have been provided to facilitate access between podium and lower ground levels. All access routes have been designed in accordance with Section 1.1.3.3 of TGD M 2010 to provide compliant gentle slopes across the site with level landings where required.

The landscape proposals seek to maximise permeability through the site. The site will benefit from improved pedestrians and cyclist access and permeability in line with the aspiration of DMURS. There are four principal pedestrian connections into the site. The first two are from Old Bray Road to the south and southwest of the site, the third from the new northern gateway along the N11 Corridor, and the fourth is a potential pedestrian access to Willow Grove.

Detailed information of the interface in between the communal open space, private space and public space are included in the Landscape Design Statement. Ground and lower ground floor apartments floor level benefit from defensible buffer space planting and screened by a privacy strip to improve security and privacy of those units. The design intent is to create a safe yet aesthetically pleasing solution, which ensures residents maintain their privacy without compromising the view

3.7 Surface Water Management

Item 7 states:

Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division as indicated in Appendix B of the Planning Authority's Opinion (dated May 7th 2021). Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. A revised/updated Site Specific Flood Risk Assessment should be submitted which addresses the matters raised in the Drainage Report (dated 07/05/2021) of the PA, as contained in Appendix B of their Opinion

Please refer to the Response to **ABP Opinion Items 1, 7 and 8** (attached to this letter) and the **Infrastructure Design Report** both prepared by DBFL Consulting Engineers for further details of the proposed surface water drainage and SUDS design.

JBA Consulting have also carried out a Stage 1 Stormwater Audit of the proposed surface water drainage design which has been submitted with this application (Appendix H of Infrastructure Design Report).

A flood hazard assessment has been undertaken by reviewing information from the Office of Public Works (OPW) National Flood Hazard Mapping (www.floods.ie) and the Eastern CFRAM Study. This assessment has been carried out in accordance with the procedures for a "Flood Risk Assessment" as outlined in the OPW's Guidelines for Planning Authorities – The Planning System and Flood Management (November 2009). No fluvial flooding is indicated in the vicinity of the site (i.e. the site is located in Flood Zone C as defined by the Guidelines, therefore, the proposed development is appropriate for the site's flood zone category). Please refer to Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers and submitted herewith.

3.8 Road, Access & Circulation

Item 8 states:

Additional details in relation to roads, access and circulation, having regard to the report of the Transportation Division of the planning authority as detailed in Appendix B of their Opinion (dated 14th

May 2021). In addition, a car parking strategy that provides further justification for the level of car parking proposed should be submitted. The justification should include an analysis of car parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators.

Please refer to the Response to ABP Opinion Items 1, 7 and 8, the Infrastructure Design Report both prepared by DBFL Consulting Engineers for further details of the proposed road, access and circulation design.

With reference to the Transport Planning Report mentioned in Item 8, the Applicant has sought to provide additional details in respect of concerns raised. In this respect:

- Details of Taking in Charge areas have been included under Item 9 below.
- Detailed road layouts have been provided, ensuring that footpaths no less than 2.0m wide are provided throughout the scheme and with connections/tie-in to existing and proposed external pedestrian networks (see DBFL Drawing 180208-DBFL-XX-XX-DR-C-2001).
- A DMURS Design Statement has been prepared by DBFL Consulting Engineers and submitted with the application.
- A Traffic and Transport Assessment Report and a Preliminary Design Stage Quality Audit has been undertaken by DBFL Consulting Engineers.
- A detailed Parking Management Strategy is submitted as outlined below.

A **Parking Management Strategy** has been prepared by DBFL, Consulting Engineers in response to Item 8. The Parking Management Strategy presents the rationale behind the identification of the quantum of vehicle parking and cycle parking that is proposed as part of the development proposals. The document also sets out the management measures that will be deployed to allocate the use and control of parking provided at the proposed development site. The Traffic Impact Assessment and Mobility Management Plan, also prepared by DBFL and submitted herewith, detail the excellent level of access to alternative modes of travel which will be available to residents of the proposed development as well as providing details on existing conditions surrounding the site.

The Parking Strategy concludes that the level of car parking provision, 237 no. car parking spaces (0.57 spaces per unit) for 419 no. residential units is appropriate having regard to the characteristics of the BTR development, the low levels of car use in apartment developments in the area, the proposed mobility measures, the level of car ownership and usage as well the requirement for reduced car parking as set out in the 'Sustainable Urban Housing: Design Standards for New Apartments.

Due to the Build-to-Rent nature of the development the built and occupied development will be heavily managed by the appointed management company which will ensure the strategies within the report are enforced. These strategies include, but are not limited to, the following:

- Residents car parking permit which permits access to the basement car park;
- A clamping enforcement regime for the misuse of designated vehicle spaces and illegal parking practices;

- Automatic Number Plate Registration to permit entry to the basement car park only to valid permit holders; and
- Controlled barriers preventing vehicles from accessing any of the courtyard and pedestrianized areas within the development.

The development provides 819 no. bicycle parking spaces on site which is in excess of the DLRCC development management standard. This increased level of cycle parking is intended to encourage and support a positive modal shift away from a dependency on car travel, in addition to the excellent public transport alternatives located within close proximity to the subject site, such as bus stops serving the frequent bus routes 145 and 46a on the N11 Stillorgan Road.

Please refer to the Response to ABP Opinion Items 1, 7 and 8, (attached to this letter) the Infrastructure Design Report both prepared by DBFL Consulting Engineers for further details of the proposed road, access and circulation design.

3.9 Taking in Charge

Item 9 states:

Taking in Charge details

The extent of lands to be taken in charge have been indicated on HJL Dwg No. HJL SW 00 DR A 0011.

The only areas which have been designed to taking in charge standards are the pedestrian footpath along the Old Bray Road (including the interface of the access with the public realm) and the pedestrian footpath proposed along the N11.

As the N11 pedestrian footpath is within the ownership of Dun Laoghaire Rathdown County Council it has not been indicated as to be taken in charge as the lands will remain so post development.

I trust that the application documentation is in order, and I look forward to a favourable decision from the Board.

Yours sincerely,



Declan Brassil
Declan Brassil & Co.

APPENDIX A: Response to ABP Opinion Items 1, 7 and 8 prepared by DBFL Consulting Engineers

RESPONSE TO ABP OPINION ITEMS 1, 7 and 8

ABP-310042-21

Subject: Response to ABP Items 1, 7 and 8 **Produced by:** BK / HG

Project: Lands at Cornelscourt, Dublin 18

Job No: 180208 **Date:** 24/11/2021

1.0 ABP Item 1

1. Additional water and wastewater details which addresses matters raised in the report of Irish Water, dated 31st May 2021 to An Bord Pleanála. The documentation at application stage should clearly indicate the nature of infrastructural constraints, the proposals to address the constraints, the timelines involved relative to the construction and completion of the proposed development and any statutory consents required. (The prospective applicant may wish to satisfy themselves that an application is not premature having regard to the information sought above).

2.0 Response to Item 1

Wastewater

The applicants and DBFL have engaged in significant consultation on foul drainage provisions for the subject site with Irish Water. Following these detailed discussions and submission of design proposals an updated Confirmation of Feasibility has been received from Irish Water (included in Appendix D of DBFL's Infrastructure Design Report).

- A key design requirement during these discussions was the provision of a 2,150 m³ balancing storage tank within the subject site to accommodate for additional storm storage within the wider catchment (this is also referenced in the updated confirmation of feasibility letter). The proposed development makes provision for the on-site 2,150 m³ balancing storage tank (located in the eastern corner of the site) which will facilitate a potential future upgrade of the Foxrock catchment by



Irish Water. The applicant will continue to engage with Irish Water with regard to the scope of works and delivery strategy for the balancing storage tank. The proposed arrangement of the balancing storage tank is shown on the drawings 180208-DBFL-XX-XX-DR-C-3001 (Site Services Layout - Sheet 1), 180208-DBFL-XX-XX-DR-C-3004 (Site Services Layout - Sheet 2) and 180208-DBFL-XX-XX-DR-C-3051 (Foul Pump Station & Additional Balancing Storage).

- In addition to the new catchment storm storage tank a new 825mm diameter combined sewer will be constructed, traversing the site from the entrance at Old Bray Road to the 2,150 m³ balancing storage tank (located in the eastern corner of the site). This pipeline will also facilitate a potential future upgrade of the Foxrock catchment by Irish Water. Refer to drawings 180208-DBFL-XX-XX-DR-C-3001 (Site Services Layout - Sheet 1) and 180208-DBFL-XX-XX-DR-C-3040 (IW Interceptor Sewer Long Sections)
- Provision of the balancing storage tank and 825mm diameter combined sewer as noted above is not required to facilitate the proposed development itself but will form part of future upgrades within the wider Foxrock catchment by Irish Water. The site is therefore delivering a positive element of future foul infrastructure for the local area and general drainage catchment.
- As part of the proposal referred to in the Confirmation of Feasibility and to service the development in the short term the storm storage facility includes an on-site pumping station / storage in order to store foul drainage flows from the development during heavy rainfall conditions should the existing combined sewer network downstream come under pressure. The on-site pump station is to be integrated within the 2,150 m³ balancing storage tank. As noted in the confirmation of feasibility letter from Irish Water dated 4th October 2021 "Design of the pump station and related equipment has to be agreed with IW at connection application stage. Some enhanced features in terms of telemetry, pump resilience will be required at this foul pump station". Emergency storage is facilitated at this pump station for both 24-hour and 48-hour foul drainage flows from the development. As noted previously, design of the pump station will be agreed with Irish Water at connection application stage (this will include integration of the pump station with the 2,150 m³ balancing storage which the development is



providing to facilitate potential future upgrades of the wider Foxrock catchment by Irish Water). Refer to drawing 180208-DBFL-XX-XX-DR-C-3050 (Foul Pump Station Layout & Section).

- Post catchment storm events stored foul flows from the development are then returned to proposed 300 diameter pipeline which outfalls from the site's eastern corner, towards northern end of Willow Grove and onwards along the verge adjacent to the N11 prior to discharge to manhole SO22257704 on the existing combined sewer network (approx. 240m from the eastern corner of the site). The proposed 300 diameter pipeline will also facilitate potential future upgrades of the wider Foxrock catchment by Irish Water. Refer to drawing 180208-DBFL-XX-XX-DR-C-3004 (Site Services Layout - Sheet 2). The 300mm outfall also receives flows from the site foul pump station during its standard operation, (ie outside storm events). The telemetry provisions referred to above will be used to control the operation of and discharge from the site pump station.
- Vehicle access for servicing / maintenance of the proposed foul pump station / storage tank is facilitated via the site access from Old Bray Road and the podium area (removable bollards are located on the southern side of the podium allowing access via the shared vehicle / cycle / pedestrian surface which runs from the podium area, along the southern site boundary before turning north towards the pump station / balancing storage).

Water Supply

Irish Water's updated confirmation of feasibility letter dated 4th October 2021 advises that provision of a water connection is feasible subject to construction of a 40m long watermain between the site and an existing 9' watermain on Old Bray Road. Refer to drawing 180208-DBFL-XX-XX-DR-C-3002 (Watermain Layout).



3.0 ABP Item 7

7. Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division as indicated in Appendix B of the Planning Authority's Opinion (dated May 7th 2021). Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk. A revised/updated Site Specific Flood Risk Assessment should be submitted which addresses the matters raised in the Drainage Report (dated 07/05/2021) of the PA, as contained in Appendix B of their Opinion

4.0 Response to Item 7

Details of the proposed development's surface water drainage and SUDS design are outlined in DBFL's Infrastructure Design Report (180208-rep-001) and on the DBFL drawings noted below.

- 180208-DBFL-XX-XX-DR-C-3001, Site Services Layout - Sheet 1
- 180208-DBFL-XX-XX-DR-C-3003, Surface Water Catchment Areas
- 180208-DBFL-XX-XX-DR-C-3004, Site Services Layout - Sheet 2
- 180208-DBFL-XX-XX-DR-C-3010, Typical Drainage Details Sheet 1
- 180208-DBFL-XX-XX-DR-C-3011, Typical Drainage Details Sheet 2
- 180208-DBFL-XX-XX-DR-C-3012, Typical Drainage Details Sheet 3
- 180208-DBFL-XX-XX-DR-C-3013, Typical Drainage Details Sheet 4
- 180208-DBFL-XX-XX-DR-C-3014, Attenuation Details for Area A and B
- 180208-DBFL-XX-XX-DR-C-3015, Attenuation Details for Area C and D
- 180208-DBFL-XX-XX-DR-C-3030, Longitudinal Sections – Surface Water

Details of the applicant's and DBFL's engagement with Irish Water with regard to the provision of a 2,150 m³ balancing storage tank within the subject site are outlined in Section 2.0 of this report (Response to Item 1 of the ABP Opinion).

Attenuation and surface water network designs have been carried out using Microdrainage WinDes analysis software (calculation sheets are included in Appendix



C and Appendix F of the Infrastructure Design Report). These calculations have been reviewed / approved as part of the independent Stage 1 Stormwater Audit carried out by JBA Consulting.

Trial pit logs, infiltration test results and a test location plan are included in Appendix B of the Infrastructure Design Report. The full Ground Investigation Report (GII, April 2019) is also included within the application documents (see Appendix 7.B of the Environmental Impact Assessment Report).

The proposed extent of green roof is identified on drawing 180208-DBFL-XX-XX-DR-C-3003 (Surface Water Catchment Areas). Also refer to Table 3.1 in the Infrastructure Design Report. This drawing and table also outline the surface water catchment strategy (including factored impermeable areas).

The proposed surface water drainage layout, attenuation layout and details, drainage construction details and details of proposed SUDS measures are detailed on the drawings noted above. A full description of the surface water drainage design, runoff coefficients, calculation of allowable greenfield runoff, attenuation design and a detailed description of proposed SUDS measures are included in Section 3.0 of the Infrastructure Design Report.

Longitudinal sections of the surface water drainage network are shown on • 180208-DBFL-XX-XX-DR-C-3030. This long section includes cross-over points with the proposed foul drainage network and the 825 diameter interceptor sewer. Detailed co-ordination with other services (electrical ducting, comms. ducting etc.) will be finalised during post planning design stages.

The SUDS strategy has been coordinated with the landscape design / layout e.g. the site's internal shared vehicle / cycle / pedestrian surface (adjacent to the south-western and south-eastern boundaries) will be directed to the proposed pipe network via tree pits with overflow to conventional road gullies. At selected locations gullies have been located adjacent to trees to facilitate this strategy, such locations are identified on drawing 180208-DBFL-XX-XX-DR-C-3001.

A Stage 1 Stormwater Audit has been carried out by JBA Consulting and is included in Appendix H of the Infrastructure Design Report.



A flood hazard assessment has been undertaken by reviewing information from the Office of Public Works (OPW) National Flood Hazard Mapping (www.floods.ie) and the Eastern CFRAM Study. This assessment has been carried out in accordance with the procedures for a "Flood Risk Assessment" as outlined in the OPW's Guidelines for Planning Authorities – The Planning System and Flood Management (November 2009). No fluvial flooding is indicated in the vicinity of the site (i.e. the site is located in Flood Zone C as defined by the Guidelines, therefore, the proposed development is appropriate for the site's flood zone category). Overland flow routes are identified in Figure 5.1 of the Site Specific Flood Risk Assessment.



5.0 ABP Item 8

8. Additional details in relation to roads, access and circulation, having regard to the report of the Transportation Division of the planning authority as detailed in Appendix B of their Opinion (dated 14th May 2021). In addition, a car parking strategy that provides further justification for the level of car parking proposed should be submitted. The justification should include an analysis of car parking demand that is likely to be generated by the proposed development taking account of the locational context and level of connectivity (by all modes) to services and employment generators.

6.0 Response to Item 8

In reference to the Transport Planning Report mentioned above, the applicant has sought to provide additional details for the following areas of concern.

- **Access**

The proposed site's vehicular access, onto the R842 Old Bray Road, is shared by the Cornelscourt AIB Bank. It is proposed to incorporate a one lane exit and a single entry lane onto the access to service the vehicles exiting the basement car park of the proposed development. A back-to-back right turn pocket will serve vehicles entering onto the site from the shared access with AIB Bank. The access junction onto the R842 Old Bray Road, will continue to operate as a priority junction. The site access junction is fully compliant with regard to minimum visibility splays. The proposed roads layout is presented in DBFL Drawing No. 180208-DBFL-XX-XX-DR-C-2001.

Whilst the vehicle tracking from the site access is illustrated in the following DBFL drawings:

- 180208-DBFL-XX-XX-DR-C-2003
- 180208-DBFL-XX-XX-DR-C-2004
- 180208-DBFL-XX-XX-DR-C-2005



- ***Pedestrian and Cyclists Access***

Two pedestrian accesses are located on the Old Bray Road; one access is shared by vehicles entering the site with the second access on the Old Bray Road operating as a dedicated pedestrian access only. The accesses will lead pedestrians into the main entrance plaza of the development site. All minimum footpath widths are adhered to as per DMURS standards.

A pedestrian island will also be placed at the access junction, to allow safe crossings for pedestrians. A third pedestrian and cycle link will be provided from the northern boundary of the site to the N11 Stillorgan Road and a future potential connection is proposed to the adjacent Willow Grove.

A dedicated cycle access is provided from the podium slab (via steps with adjacent wheel channels) to take cyclists from the site's courtyard to bicycle parking areas in the basement. This cycle route is completely separate from the vehicle access ramp to the basement in accordance with DLRCC requirements.

- ***DMURS***

Detailed roads layouts will be provided, ensuring that footpaths no less than 2.0m wide are provided throughout the scheme and with connections / tie-in to existing and proposed external pedestrian networks.

- ***Quality Audit***

Recommendations from the completed Quality Audit have been taken into consideration for the redesign of various areas within the proposed development. These include: the internal arrangement of the basement car park, the access/egress into the basement, the site access junction and the pedestrian and cycle routes within the development.



- ***Car Parking Standards***

A detailed Parking Management Strategy is to be submitted which outlines the allocation of the proposed car parking provision among development residents. Due to the Build-to-Rent nature of the development the built and occupied development will be heavily managed by the appointed management company which will ensure the strategies within the report are enforced. These strategies include, but are not limited to, the following:

- Residents car parking permit which permits access to the basement car park;
- A clamping enforcement regime for the misuse of designated vehicle spaces and illegal parking practices;
- Automatic Number Plate Registration to permit entry to the basement car park only to valid permit holders; and
- Controlled barriers preventing vehicles from accessing any of the courtyard and pedestrianized areas within the development.

In addition, the Car Park Management Strategy will clearly designate the available car parking spaces per the development uses and outline the measures by which these allocations will always be enforced to ensure an efficient use of car parking spaces. The DLRC required allocation for disabled car parking spaces have been adhered to.

- ***Cycle Parking Provision***

Cycle parking numbers and types have been amended to provide a total of 819 no. bicycle parking spaces. Of these spaces 664 no. spaces will be located at basement level in secure, sheltered bicycle storage rooms; of these 160 no. will be Sheffield stands and 540 no. will be two tier racks. At surface level 155 no. cycle parking spaces are provided with 3 no. of these spaces being cargo bicycle spaces.

The dedicated cyclist access points into the development are outlined in the Parking Management Strategy, three access points are provided for cyclists to directly access the basement cycle parking areas.



- ***Motorcycle Parking***

As per the DLRCC standards, a provision equivalent to 4% of overall car parking provision has been provided for motorcycle parking. 10 no. motorcycle parking spaces have been provided in the development basement, the locations of which are shown in the Parking Management Strategy Report.

- ***Parking Management Strategy***

The Parking Management Strategy Report submitted as part of the application provides a detailed assessment of the site layout, parking provided, access routes for different residents and visitors to the development and a justification of the car parking provision relative to the context of the Build-to-Rent site and the subject site's accessible urban location.

