



STATEMENT OF RESPONSE

Coastal Quarter SHD 2 Planning Application



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Coastal Quarter SHD, Bray
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COASTAL QUARTER SHD 2 PLANNING APPLICATION

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Prepared by:

RPS

Prepared for:

Shankill Property Investments Ltd

Dublin | Cork | Galway | Sligo
 rpsgroup.com

RPS Group Limited, registered in Ireland No. 91911
 RPS Consulting Engineers Limited, registered in Ireland No. 161581
 RPS Planning & Environment Limited, registered in Ireland No. 160191
 RPS Engineering Services Limited, registered in Ireland No. 99795
 The Registered office of each of the above companies is West Pier
 Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7



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1 INTRODUCTION

This *Statement of Response* report has been prepared by RPS Group Limited (RPS) on behalf of Shankill Property Investments Limited (the applicant) to accompany an application for permission for a proposed Strategic Housing Development (SHD) consisting of 586 no. units at lands off the Dublin Road and Ravenswell Road within the former Bray Golf Course lands, Bray, County Wicklow and County Dublin.

Following preplanning consultations with Dun Laoghaire-Rathdown County Council (DLRCC) and Wicklow County Council (WCC) under section 247 of the *Planning and Development Act, 2000, as amended*, (Act of 2000), a request to enter into pre-application consultation with An Bord Pleanála (the Board) was submitted in December 2021. The pre-application consultation meeting was held on 6th May 2022 under case reference ABP-312257-21.

Planning permission was previously granted by Order of An Bord Pleanála (under reference ABP-311181) on part of the current application site for 234 no. residential units, a childcare facility, café and retail unit, subject to a number of conditions. The current application incorporates the entire site of that previous permission; seeking permission for those elements of the development as previously permitted under ABP-311181 as well as permission for development on those parts of the site which were previously refused permission under ABP-311181 (these comprise the proposed Blocks A and B). The pre-application consultation in respect of that previous application was under ABP-308291-20.

On 8th June 2022, the Board issued the *Notice of Pre-Application Consultation Opinion* under section 6(7) of the *Planning and Development (Housing) and Residential Tenancies Act 2016, as amended* (Act of 2016) for the proposed development, under case reference ABP-312257-21. Having regard to the above, the notice states:

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

The notice outlined 2 No. issues which the Board considered should be addressed in the documents submitted that could result in it constituting a reasonable basis for an application for SHD.

Article 297(3) of the *Planning and Development Regulations 2001-2021* (the Regulations) states:

“Where, under section 6(7) of the Act of 2016, the Board issued a notice to the prospective applicant of its opinion that the documents enclosed with the request for pre-application consultations required further consideration and amendment in order to constitute a reasonable basis for an application for permission, the application shall be accompanied by a statement of the proposals included in the application to address the issues set out in the notice.” A *Statement of Proposals* report under separate cover has been prepared in accordance with article 297(3) of the *Planning and Development Regulations 2001-2021* (the Regulations). That statement addresses the 2 No. issues which the Board considers should be addressed in the documents submitted that could result in it constituting a reasonable basis for an application for SHD.

The Board’s Opinion also requested that specific information should be submitted with any application for permission stating *“Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission”* and notes 20 no. items. Those items pursuant to article 285(5)(b) of the Regulations are considered hereunder in **Section 2** of this report.

As the current application incorporates development on the site which was previously permitted under ABP-311181-21, and which was subject of pre-application with An Bord Pleanála under ABP-308291-20, we also address in **section 3** of this report the items of specific information sought in the Opinion of An Bord Pleanála under ABP-308291-20.

2 SPECIFIC INFORMATION TO BE SUBMITTED (ABP-312257-21)

Pursuant to article 285(5)(b) of the Regulations, the applicant is required in addition to requirements as specified in articles 297 and 298, to submit the following 20 No. items of information as specified by the Board in its Notice dated 8th June 2022. We set out hereunder where this information is provided within the application documentation.

2.1 Item 1 – Accordance with Planning Policy

“A detailed statement of consistency and planning rationale, clearly outlining how in the prospective applicant’s opinion, the proposal is consistent with the zoning objectives of the DLRDCDP 2022 – 2028 and the Bray MD LAP 2018.”

Applicant’s Response

A *Planning Report and Statement of Consistency* outlining how in the prospective applicant’s opinion, the proposal is consistent with the zoning objectives of the *DLRDCDP 2022 – 2028 and the Bray MD LAP 2018* has been prepared by RPS and is submitted as part of this application.

2.2 Item 2 - Material Contravention

“A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the DLRD County Development Plan 2022 - 2028 and Bray MD LAP 2018 other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.”

Applicant’s Response

A *Statement of Material Contravention* has been prepared by RPS and is submitted as part of this application. The statutory notice pursuant to section 8(1)(a) of the Act of 2016 and article 292 (1) of the Regulations, has been clearly worded noting the proposed development materially contravenes the planning authority’s statutory plan.

2.3 Item 3 - Visual Impact Assessment

“A visual impact assessment of the proposed development that addresses, inter alia, the height, scale and massing of the proposal in the context of the nature of the receiving environment. Long range views / photomontages of the proposed development from the surrounding area, in particular from the east.”

Applicant Response

A visual impact assessment has been undertaken and is included in the *Environmental Impact Assessment Report* as part of this application.

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2.4 Item 4 - Integration

“An assessment on how the proposed scheme ties in with the expansion of the overall Bray seafront area in particular in light of recent split decision on foot of SHD 311181-21. It is important that the proposed scheme should be highly visually and functionally connected to the portion of the scheme permitted under the recent SHD 311181-21. There needs to be strong permeability within the scheme and into adjoining lands.”

Applicant Response

The reference to ‘the proposed scheme’ in this case refers to the new proposals for Blocks A and B which were previously refused permission under SHD 311181-21 as the pre-application consultation was based on these elements given that the previously permitted development was not proposed to be revised. The essence of this assessment sought therefore is that Blocks A and B should be highly visually and functionally connected to the element of the development previously permitted under SH 311181-21 and included again within the current application. There needs to be strong permeability within the areas of Blocks A and B and also the overall Coastal Quarter scheme subject of this application as well as providing strong external linkages to the wider surrounding area.

The proposed design provides such strong visual and functional connections through vehicular, pedestrian and cycle linkages within the site and connecting with the external network.

Further detail on connectivity and permeability both within the application site itself and externally is set out in the *Architectural Design Statement* prepared by GHA and the *Traffic and Transport Assessment* prepared by Atkins.

2.5 Item 5 - Housing Quality Assessment

“A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.”

Applicant Response

A *Housing Quality Assessment* (HQA) has been prepared by GHA and is submitted as part of this application. The HQA includes specific information regarding the proposed apartments and demonstrates how the proposed apartments comply with the various requirements of the Apartment Standards.

The floor plan drawings submitted are already colour coded to identify the unit sizes. To avoid confusion and to ensure the clarity sought by the Board, a clear unit numbering system for each unit is provided on the drawings which corresponds to the HQA. The numbering system identifies the Block (A1, A2, B1, B2, C and D), the Floor (00-ground floor, 01-first floor, 02- second floor etc) and unit number per floor (01,02, 03 etc). Unit No. 2 on Floor 4 of Block A1 for example is therefore numbered A1.04.02. The HQA in turn identifies each apartment by the numbering system and clearly identifies (through colour coding) which apartments are dual aspect (marked in green) and which units exceed the floor areas by 10% (marked in blue).

It is noted that the numbering system is also carried through to the Daylight and Sunlight Assessment Report and so can also be easily and clearly cross-referenced.

2.6 Item 6 - Traffic and Transportation Impact Assessment

“A Traffic and Transportation Impact Assessment.”

Applicant’s Response

A *Traffic and Transport Assessment* has been prepared by Atkins and is enclosed in this planning application.

2.7 Item 7 - Consistency of Proposals

“Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.”

Applicant Response

The design team have worked together closely to ensure that all proposals and plans, including architectural, engineering and landscaping are integrated and coherent. The green infrastructure proposals, landscaping plan, arboriculture drawings, and engineering plans have all been co-ordinated and cross referenced to ensure consistency.

2.8 Item 8 - Residential Amenity

“A report that addresses issues of residential amenity, specifically with regards to potential overlooking, overshadowing and overbearing. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and any adjacent existing or permitted development.”

Applicant Response

An *Architectural Design Statement* has been prepared by GHA and is submitted as part of this application. We refer the Board in particular to section 2.10 which addresses Privacy and Amenity and which cross references the Daylight and Sunlight Analysis prepared by 3D Design Bureau. We also refer to section 2.5 which addresses Solar Orientation and Daylighting. This includes a diagram showing sunreach in ground floor through the scheme. Finally, we specifically refer to section 2.1 which incorporates a study on boundary considerations which amongst other aspects assesses distances from proposed development to existing and permitted adjacent development, including diagrams and sections as relevant. We also refer Board to the wider content of the Architectural Design Statement which explains the rationale for the overall layout, design and massing and how it has been grounded in ensuring appropriate residential amenities for future residents while protecting those of existing surrounding residential areas.

Finally, we refer to the site wide elevation drawings by Glenn Howells Architects, which illustrate separation distances between various elements of the proposed development, including both the development elements previously permitted under Ref ABP-311181-21 and the new proposed elements, Blocks A and B.

2.9 Item 9 - Daylight and Shadow Impact Assessment

“A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies. Impact to any neighbouring properties.”

Applicant Response

The design team has sought to find a balanced approach which maximises daylight levels and other relevant factors such as density, building form, overheating risk, privacy and the provision of balconies which are compliant with the Apartments Standards.

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A *Daylight and Sunlight Assessment Report* for the Proposed Development has been undertaken by 3D Design Bureau and is submitted as part of the application documentation. This report assessed sunlight access and daylight access for future occupiers, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development.

In addition, to assessing the daylight and shadow conditions within the development itself, the assessment also considered the potential for the proposed development to impact on existing neighbouring gardens and/or amenity areas to the north of the proposed development as well as the Ravenswell Schools Complex to the west. Areas located to the south are unlikely to be affected due to sun direction and overshadowing is highly unlikely to occur in areas that are due south of any proposed development. In considering what level of assessment is appropriate for the dwellings to the north and the school to the west, 3D Design Bureau note that the BRE Guidelines recommend that if any part of a new building or extension, measured in a vertical section perpendicular to a main window wall of an existing building, from the centre of the lowest window, does not subtend an angle of more than 25° to the horizontal, then the daylighting and sunlighting of the existing building are unlikely to be adversely affected. Using this guidance as a rule of thumb it was concluded that no impact assessment was required for the proposed scheme in terms of its potential impact on Ravenswell Schools Complex to the west of the proposed development, or the existing dwellings to the North of the scheme. As already noted, the development cannot overshadow lands to the south and there are no existing dwellings or structures to the east that may be impacted. A similar approach was adopted in respect of the previous application ABP-311181-21 and appears to have been considered an appropriate and acceptable response by An Bord Pleanála.

2.10 Item 10 - Planning Authority Opinions

“A full response to matters raised within the PA’s CE Opinion’s (both Wicklow County Council and Dun Laoghaire Rathdown County Council) and addendum reports submitted to ABP.”

Applicant Response

Prior to responding in detail to the PA’s CE Opinions of both Planning Authorities, it is noted that the nature and extent of development which was presented to An Bord Pleanála (and to Wicklow County Council and Dún Laoghaire Rathdown County Council) during the pre-application phase under Ref. ABP-312257-21 was essentially the development which was previously proposed under ABP 311181-21. Having regard to both the split decision under ABP 311181-21 where Blocks A and B were refused permission, combined with the subsequent commentary of both Authorities and An Bord Pleanála under the most recent pre-application process ABP-312257-21) the proposals for Blocks A and B as now presented in this current application have been significantly altered. The design concept for the current proposed Blocks A and B, including how the previous reason for refusal has been addressed, is set out in detail in the *Architectural Design Statement* submitted with this application.

2.10.1 Response to Dún Laoghaire Rathdown County Council CE Opinion

The CE Opinion issued by *Dún Laoghaire- Rathdown County Council* firstly sets out the detail of internal reports on drainage, transportation, public lighting and parks and landscaping. Having set out this background it presents a ‘Conclusion and Summary of Consideration / Issues that may have a Bearing on the Board’s Decision’. We address the matters raised in this concluding section of the report.

Firstly, we note that the Planning Authority establishes its support in principle for development at this location but notes it has *“some concerns noted in relation to the height, massing, layout, and position/siting of proposed apartment block and duplex units relative to existing adjacent properties, and relative to the visually sensitive coastal location of the subject site.”*

In this regard, the CE Opinion sets out a number of matters which it considers requires further consideration and which may have a bearing on the Board's decision. We note these below and set out responses to each.

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- *The height of proposed apartment Block 1A with regard to its location within the Coastal Fringe Zone as identified in the Building Height Strategy (Appendix 9) of the Dun Laoghaire Rathdown County Development Plan 2016-2022, whilst also having regard to the Guidelines for Planning Authorities on Urban Development and Building Heights (2018).*

Response

As noted above, Blocks A and B as now proposed in this application have been redesigned to address the previous refusal of permission of those elements and the concerns expressed in the recent pre-planning phase. In developing the revised proposed designs for Blocks A and B, the design team explored options which considered alternative ways to respond to the identified concerns. The current overall approach to massing and height at the subject site is to provide a gradual increase in height and massing from north to south and from west to east. This will avail of the opportunity to accommodate taller elements along the eastern side of the site with its open coastal location and in particular at the southwestern area of the site closest to Bray town centre. This approach and design is further detailed in the enclosed *Architectural Design Statement* prepared by GHA. Compliance of the proposals with the current DLR CDP and the *Guidelines for Planning Authorities on Urban Development and Building Heights* is outlined in the enclosed *Planning Report and Statement of Consistency* prepared by RPS.

- *“The height and massing of proposed Block 1A in its entirety, and as viewed in context of the overall development, including adjacent Block 1B, at the subject coastal location.”*

Response

As noted above the revised design height and massing of Blocks A and B have been appropriately scaled and are strategically located on the site to optimise their outlook with respect of the coastline and identify Harbour Point as new addition to Bray’s Seafront. with its open coastal location and in particular at the southwestern area of the site closest to Bray town centre. The approach and design is further detailed in the enclosed *Architectural Design Statement* prepared by GHA. Compliance of the proposals with the current DLR CDP and the *Guidelines for Planning Authorities on Urban Development and Building Heights* is outlined in the enclosed *Planning Report and Statement of Consistency* prepared by RPS.

- *“The height and proximity of the proposed development Block 1D to the northwestern boundary of the subject site and resultant visual impact of same as viewed from existing adjacent properties to the northwest; including with regard to tree retention along site boundaries and photomontage images submitted.”*

Response

Block D is considered capable of accommodating some increased height given its location adjacent to the open Corke Abbey Valley Park offering passive surveillance to this linear walk. It nevertheless steps up only to 4 storeys in response to the previous opinion issued by the Board (**ABP Ref. 308291-20**), and which height was considered appropriate given its grant of permission under **ABP Ref. 311181-21**. The design of Block D is considered further in the enclosed *Architectural Design Statement* prepared by GHA.

- *“Siting of proposed built form within transitional zonal areas of the subject site, in particular the location of proposed apartment Blocks 1A and 1D relative to areas of the subject site within the administrative boundary of Dun Laoghaire Rathdown County Council subject to zoning objective ‘F’.”*

Response

Blocks A and D are not located within lands zoned F but are close to it. In general, the provision of residential development close to areas of public open space is a positive attribute both for future residents who avail of views over open space and of users of the park / open spaces who benefit from passive overlooking and security. The design response proposed seeks to embed the proposed development into this existing context to bring enhanced benefits for both the open space lands and the residential lands. We further note that the location of Block D is as previously permitted by An Bord Pleanála under ABP-311181-

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21. The location of Block A relative to the F zoned lands is comparable to that proposed in the previous application ABP-311181-21. While the Board refused permission for that block based on design reasons, it's location relative to 'F' zoned lands was not identified by the Board as a concern.

- *“Potential overlooking of the proposed development on existing adjacent residential properties to the northwest due to the proximity of and position of upper floor level balcony/terrace areas on the elevations of proposed apartment Block 1D and House Type H2.”*

Response

Planning permission was granted for Block D under **ABP 311181-21** and the current proposal does not deviate from the consented scheme other than by changing the proposed external finishes from render to brick. The 4th floor of Block D is set back to the west and the east, ensuring that the block is effectively a 3 storey building at its closest point to 112 Corke Abbey so as to minimize overlooking. The location of the end of terrace duplex apartments closest to Corke Abbey is approx. 19m from the existing housing and a number of 1st and 2nd floor gable windows are excluded to prevent overlooking. Further detail is provided in the enclosed *Architectural Design Statement* prepared by GHA.

- *“Location of proposed play spaces relative to subject site boundaries and existing adjacent residential properties.”*

Response

The location of play spaces are shown on Drawing 6948-L-2000 (Landscape Masterplan) prepared by Park Hood with further detail and a design rationale presented in the associated Landscape Design Strategy also by Park Hood. In brief the play areas for younger children (0-6 years) are provided both within secure communal open space areas overlooked directly by surrounding apartments, and also as small play pockets and natural play areas immediately adjacent to the main pedestrian routes. This provides variety of play areas for different experiences whilst also ensuring high levels of securing and surveillance. The larger community and active play areas for older children and adults are located within public open space and larger communal areas slightly further from the residential units. These areas still benefit from passive surveillance from upper floors of apartment buildings and also from public roadways and walkways.

- *“Separation distances between proposed apartment blocks, and between proposed apartment block and proposed dwelling/duplex units within the scheme.”*

Response

Section 2.1 of the *Architectural Design Statement* incorporates a study on boundary considerations and includes amongst other aspects an assessment of distances from proposed development to existing and permitted adjacent development, including diagrams and sections as relevant. We also refer Board to the wider content of the *Architectural Design Statement* which explains the rationale for the overall layout, design and massing and how it has been grounded in ensuring appropriate residential amenities for future residents while protecting those of existing surrounding residential areas.

The site wide elevation drawings by Glenn Howells Architects, also illustrate separation distances between various elements of the proposed development, including both the development elements previously permitted under Ref ABP-311181-21 and the new proposed elements, Blocks A and B

Potential impacts on access to daylight and sunlight have been carefully considered, with appropriate separation distances and building heights provided to mitigate against any unacceptable levels of overshadowing in accordance with recommended best practice standards. Further information in relation to daylight, sunlight and overshadowing is set out in the *Daylight and Sunlight Assessment Report* prepared by 3D Design Bureau which is enclosed as part of the planning documentation.

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- *“Requirement for more detailed and supplementary contextual elevations and photomontage images of the proposed development with regard to the visual impact of same.”*

Response

A visual impact assessment of the proposed development has been undertaken and is included in the EIAR, this assessment is supported by a range of photomontages (i.e. Accurate Visual Representations) prepared by 3D Design Bureau. Sitewide Elevation drawings prepared by GHA are included in the application documentation (Dwg no.s BRA-GHA-SW-ZZ-DR-A-05030 and BRA-GHA-SW-ZZ-DR-A-05031).

- *“Requirement for shadow cast analysis images of the existing environment and images demonstrating the impact the proposed development on existing adjacent properties, and open space areas within the overall scheme, is advised to allow for full assessment of the proposed scheme.”*

Response

The enclosed *Daylight and Sunlight Access Report* undertaken by 3D Design Bureau includes a shadow study for the proposed development. The scheme performs favourably with no concerns arising in respect of daylight or overshadowing within the scheme. As noted in section 2.9 of this report above, the *Daylight and Sunlight Access Report* did also consider with reference to the BRE guidance whether there was potential for impact on the existing dwellings to the north or the school to the west. Based on the BRE methodology and the proposed layout and scale of buildings at the site, it was concluded that an impact assessment of those properties was required. A similar approach was adopted in respect of the previous application ABP-311181-21 and appears to have been considered an appropriate and acceptable response by An Bord Pleanála. *“Discrepancies regarding floor layout plans, specifically proposed apartment Block IA.”*

The floor layout plans have been reviewed and updated and discrepancies noted by DLRCC addressed.

- *“Issues raised in the Drainage report of 05/01/2022.”*

Response

All pertinent drainage issues are considered in the enclosed *Engineering Planning Report, Stormwater Impact Assessment Report* and *Flood Risk Assessment*, all prepared by Atkins.

- *“Issues raised in the Transportation Planning report of 07/01/2022.”*

Response

Key items in the Transportation Planning report of 07/01/2022 are quoted below and responses provided. It should be noted that transport issues are fully considered in the *Traffic and Transport Assessment* and associated drawings and reports including a *Mobility Management Plan, DMURS Statement* and *Stage 1 Road Safety Audit* prepared by Atkins.

- *“The provision of 142 No. car parking spaces to serve the proposed dwelling houses in accordance with the current DLRCC County Development Plan 2016- 2022. All proposed car parking spaces shall be on/near curtilage. The drawings shall demonstrate the allocation of all parking spaces, and that parking spaces for dwelling houses have a minimum length of 5.5m depth and a minimum width of 3m. Driveway widths shall be demonstrated to be no more than 3.5m in width. These requirements are in accordance with Section 8.2.4.9 Vehicular Entrances and Hardstanding Areas (i) General Specifications of the current DLRCC County Development Plan 2016-2022.*
- *The provision of car parking spaces for apartment/duplex/triplex units at a rate of 1 No. parking space per residential unit. The submitted drawings and details should also clearly mark the number and location of car parking spaces assigned to visitors, car sharing schemes, deliveries, etc.*
- *The Applicant shall submit revised drawings and details which demonstrate any proposed provision of parking for all non-residential land uses (childcare/cafe/commercial use) in accordance with*

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Table 8.2.4: Non Residential Land Use - Maximum Car Parking Standards of the current DLRCC County Development Plan. Where reduced standards are proposed, the applicant shall provide adequate justification.”

The quantum of car parking proposed and the rationale for such a quantum is detailed in the *Traffic and Transport Assessment* prepared by Atkins. The quantum of car parking is below the car parking standards set out in the *DLRCC County Development Plan* for Zone 2, but is considered to be in accordance with principles of sustainable travel and appropriate given the central location of the site within close walking distance of various public transport modes including the high capacity and high frequency DART service.

Car parking bay size provisions are set out in section 3.8 of the Engineering Planning Report by Atkins.

- *“The Applicant shall submit details which demonstrate the justification and purpose of the proposed overflow car park within the Orchard Area which contains 54 No. car parking spaces.”*

It is no longer proposed that car parking spaces be provided in the Orchard Area.

- *“The Applicant shall submit details/drawings which demonstrate how unauthorised car parking will be prevented and controlled at the proposed development.”*

Car parking spaces shall be allocated, monitored and managed within the proposed development to control unauthorised parking. Please refer to section 6 of the *Property Management Strategy Report* by Aramark submitted with the application which includes provisions for car parking allocation and management.

- *“The Applicant shall submit revised drawings which demonstrate that one car parking space per 10 no. residential units is equipped with fully functional electric*
- *The Applicant shall submit revised drawings and details which demonstrate that all proposed car parking spaces will be constructed so as to allow the future installation of electric vehicle charging points without the requirement for future intrusive works. The drawings shall demonstrate the provision of roped ducting, capping, mini-pillars and substations to facilitate future installation. On-street parking spaces and residential dwelling house parking spaces (driveways) shall also be included.”*

A minimum of 10% of all spaces will be delivered as E-Charging upfront and in addition, all remaining spaces will be provided with the infrastructure to enable E-Charging in the future.

- *“The Applicant shall submit revised drawings and details which demonstrate that a minimum of 4% of all car parking spaces are suitable for use by people with disabilities. Disabled Parking shall be proportionally shown at surface level. Note: Parking bay widths suitable for people with disabilities shall be a minimum of 2.4m wide - with a 1. 2m buffer on both sides - and 6.0 m in depth.”*

The development will provide disabled parking at a rate of 4%. All spaces are a minimum of 2.4m wide - with a 1. 2m buffer on both sides - and 6.0 m in depth.

- *“The Applicant shall submit revised drawings which demonstrate that all residential dwelling vehicular entrances are a maximum of 3.5m in width (single entrance) or 4.0m in width (shared entrance) in accordance with Section 8.2.4.9 of the current DLR CC County Development Plan.”*

None of the residential units within the proposed development have individual vehicle entrances so this requirement is not applicable in this instance.

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- *"The Applicant shall submit revised drawings and details which demonstrate a minimum of 1201 No. cycle parking spaces to serve the residential portion of the proposed development. All cycle parking shall be designed in accordance with Section 3 & Section 4 of DLRCC's Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018). Stacked cycling parking is not recommended and the preferred type of cycle parking stand is the Sheffield cycle stand. Accordingly, all proposed cycle parking at the development should be of the preferred ""Sheffield"" type and have an adequate accessible footprint space. In determining recommended space for bicycle parking a footprint of 2m x 1m is required for 2 standard bicycles parked at 1 Sheffield stand in accordance with the DLRCC standard. A portion of visitor parking shall also be provided at surface level in order to encourage use and improve natural surveillance levels.*
- *The Applicant shall submit revised drawings and details which demonstrate the provision of cycle parking for all proposed non-residential land uses (childcare/cafe/commercial use) in accordance with DLRCC's Standards for Cycle Parking and associated Cycling Facilities for New Developments (January 2018)."*

The quantum of bicycle parking proposed and the rationale for such a quantum is detailed in the *Traffic and Transport Assessment* prepared by Atkins Engineering. 1,045 no. residential bicycle parking spaces (exceeding Apartment Guideline standards) are proposed (791 No. resident spaces and 254 No. visitor spaces) and 19 no. non-residential spaces are proposed. In addition, bicycle parking can be accommodated within the 76 no. proposed houses. The location of proposed bicycle parking is shown on enclosed 'Parking Allocation' drawings by Atkins (Dwg no. 5214419-ATK-01-ZZ-DR-CE-0119 and 5214419-ATK-01-ZZ-DR-CE-0119). Stacked parking is not proposed.

- *"The Applicant shall submit a Traffic and Transport Assessment report with up- to-date and historic relevant baseline data accumulated from Traffic Surveys on the local road network. As the development will generate trips on the existing transport network (car, commercial vehicle, cycling, walking or public transport), the Applicant shall provide a full and detailed assessment of how the trips to and from the development might affect the transport network. The assessment should be an impartial description of the impacts of the proposed developments and should outline both its positive and negative aspects especially on the Wilford interchange and Dublin Road in the context of the capacity of the current road network. The report shall also take into account the future potential change to cyclist/pedestrian only access onto Ravenswell Road from Castle Street."*

A *Traffic and Transport Assessment* prepared by Atkins Engineering is, included in the planning application documentation.

- *"The Applicant shall demonstrate that due consideration has been given to the Bray and Environs Transport Study, especially Section 2.3.2."*

The role of the Bray and Environs Transport Study in shaping the proposed development is detailed in the *Traffic and Transport Assessment* prepared by Atkins Engineering. Compliance with section 2.3.2 of the *Bray and Environs Transport Study* is also considered in section 7.4.5 of the *Planning Report and Statement of Consistency* by RPS.

- *"The Applicant shall submit revised drawings and details which demonstrate in detail how connections to the linear park at the north of the site will be achieved. The red line boundary should be adjusted to include all required works to achieve the connections, and a letter of consent should be sought and provided, from DLRCC or other relevant 3rd party landowner where required and included as part of any future submission."*

Two connections to the linear park at the north of the site are shown on the Landscape Masterplan. Third party lands are not required to deliver proposed connections to the Park, and consequently letter(s) of consent are not required in this regard. Any additional future works within the park which Dún Laoghaire Rathdown County Council may consider appropriate following the provision of the connection by the applicants will be a matter for the Planning Authority.

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- *“The Applicant shall submit revised drawings and details which demonstrate that all proposed shared cycle/pedestrian routes are a minimum of 3m in width.”*

The application drawings submitted make provision for this.

- *“The Applicant is requested show on a detailed plan layout drawing the access arrangements and vehicle manoeuvres required for refuse collection, emergency vehicles and delivery, collection etc. within the proposed development. The Applicant shall show the above on a detailed layout drawing by using a Computer Aided Design (CAD) software such as Autoturn or similar computerised design software.”*

A series of vehicle tracking drawings for refuse vehicles and fire trucks have been prepared by Atkins Engineering and are included in the planning application package.

- *“The Applicant is requested to submit a detailed Quality Audit (which shall include a Road Safety Audit, Access Audit, Cycle Audit and a Walking Audit) to demonstrate that appropriate consideration has been given to all relevant aspects of the proposed residential development in accordance with the Design Manual for Urban Roads & Streets (DMURS). The independent Audit Team shall be approved by the Planning Authority (Transportation Planning Section) and all measures recommended by the Auditor shall be undertaken unless the Planning Authority approves any departure in writing. A feedback report should also be submitted providing a response to each of the items.”*

A Quality Audit, Stage 1 Road Safety Audit and a DMURS Statement all prepared by Atkins Engineering are included in the planning application package.

- *“The Applicant shall submit a detailed Construction Management Plan to the Planning Authority (Transportation Planning Section) indicating measures dealing with: a. Traffic management plan including Construction vehicular access to site in particular to avoid conflict between construction activities and traffic on the surrounding road network. b. How it will be intended to avoid conflict between construction activities and pedestrian movements on adjoining roads during construction works. c. Where it is intended to provide for site staff car parking during construction in that is not acceptable to have long term parking in the nearby residential areas. d. Proposed measures to minimise /eliminate nuisance caused by noise and dust, proposed working hours and measures to minimise/prevent transfer of dirt to the public road with associated measures to clean the public roads / gullies etc in the vicinity of the site and continuing replacement of roads line markings resulting there from”.*

A Construction Management Plan has been prepared by Atkins Engineering and is included in the planning application documentation.

- *“Issues raised in the Public Lighting report of 05/01/2022.”*

Response

The key item in the Public Lighting report of 05/01/2022 is quoted below and a response provided.

- *“Provide a full lighting report as per the previously submitted (for the previous application) level of detail”*

Details of proposed public lighting are provided in the *Public Lighting Report* prepared by Atkins (included as Appendix to MEP Engineering Report & Energy Statement).

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- *“Issues raised in the Parks and Landscaping Services report of 10/01/2022.”*

Response

Key items in the Parks and Landscaping Services report of 10/01/2022 are quoted below and responses provided. It should be noted that parks and landscaping issues are fully considered in the Landscape Design Strategy and associated drawings prepared by Park Hood Landscape Architects and the Tree Survey Report prepared by Independent Tree Surveys.

- *“The clearance of any additional vegetation (felling, removal, surgery, etc.) shall be undertaken by a suitably qualified and insured Tree Surgeon, in accordance with British Standard BS 3998:1989 including trees and scrub should be carried out outside the bird-breeding season (March - August inclusive) as stipulated under the Wildlife Acts 1976 as amended by Section 46 of the Wildlife (Amendment) Act 2000. Please consult with the National Parks & Wildlife Service. All Tree Works shall be completed before occupation of any dwellings.”*

Tree clearance and protection will be undertaken under the direction of a suitably qualified and insured tree surgeon / arborist. Clearance of tree and scrub will generally be carried out outside the bird-breeding season (March - August inclusive) as provided for in the EIAR submitted with the application. The EIAR also makes provision for cases where nesting habitat clearance cannot be avoided during this period. In such cases the EIAR confirms that the NPWS will be consulted in advance and if, in consultation, it is deemed necessary then a suitably qualified ecologist will be appointed by the Contractor to oversee clearance of nesting habitat and ensure the area is free of nesting birds. The appointed ecologist will develop a method statement for the nesting habitat clearance in consultation with local NPWS staff.

- *“The applicant must confirm that all areas for tree retention shall have zero ground disturbance to conserve existing ground conditions.”*

The Vegetation Development Impact drawing by Park Hood enclosed with this application identifies trees for retention, the extent of their Root Protection Areas (RPA) and also identifies a proposed protective barrier which will be erected to ensure protection of the trees. The line of this barrier / fence will be along the Tree root protection zone. No construction traffic, fire, materials or debris will be permitted within this zone of protection. Where local digging or excavation is required within the RPA, a hand digging / airspade method will be employed. See the Vegetation Development Impact drawing for further details.

- *Podium Planting: The applicant is to provide details on the proposed growing medium, depth and drainage of any podium planted trees. The applicant is to provide a minimum growing depth of 1400-2000mm to allow any trees to reach a suitable mature size.*

Please refer to the Atkins drawing ‘Proposed Green Intensive Courtyard and Extensive Roof Layout for details on apartment buildings courtyard build up and green roof build ups. The drawing notes that the combined thickness of all of the elements used in the courtyard roof build up will be >500mm.

- *Root Protection: Given the scale, age and nature of some of the sites existing trees, the root protection areas and the intrusion into the underlying soils capillary fringe, a long-term tree survival plan should be provided. This should demonstrate the post development impacts and not merely the existing current site conditions pre development.*
- *Tree maintenance: A comprehensive tree management plan to be provided to mitigate tree failure. The applicant is to submit a landscape maintenance plan to ensure the successful establishment of all trees and plants proposed within the scheme.*

As indicated in the enclosed Landscape Design Strategy Report, a Landscape Management and Maintenance Plan will be prepared to include details on weeding, spot herbiciding, watering, planting

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management, control of insects/diseases and grass mowing. Initial landscape operations will be undertaken by an ALCI member. This will address both new planting on site and existing trees and vegetation proposed to be maintained on site including any root protection requirements necessary.

- *Bat Survey: All mature trees proposed for felling shall be examined for evidence of bats, prior to any works by a bat specialist. If required, a National Parks and Wildlife Service (NPWS) derogation licence shall be obtained. An operational stage tree management plan for bats shall also be submitted.*
- A bat survey has been undertaken as part of the EIAR and is provided in Appendix 4 – Biodiversity of the EIAR. Chapter 4 – Biodiversity considers any impacts arising from this survey. As detailed in the EIAR, 2 No. trees near the site compound had confirmed roosts. It is noted proposed to remove these trees. In addition, 6 no. trees in the main construction footprint were identified as having medium potential for bat roosts though none were confirmed. It is proposed in the EIAR that these 6 no. trees will be re-surveyed prior to site clearance to ensure no bat activity has commenced in the interim. *Existing trees and boundary hedgerows are to be retained and protected in accordance with BS 5837:2012 trees in relation to design, demolition and construction recommendations*

The Vegetation Development Impact drawing by Park Hood specifies a protective barrier to be put in place around areas of tree / vegetation to be retained and protected. The drawing notes that this barrier will be per Fig 2 of BS5837.

- *Provision of Bird and Bat Boxes in order to mitigate for the loss of nesting habitat should be installed:*
 - 100 nest boxes
 - 50 bat boxes (if evidence of bats in the locality)

The EIAR has considered the need for bat and nest boxes based on the surveys and the impact assessment undertaken. The development proposed now provides for 36No. bat boxes and 10 No. nest boxes.

- *A Lighting Plan with input from the bat specialist including consideration of the surrounding areas. This should include the avoidance of lighting of boundary vegetation.*

Proposed public lighting drawings have been prepared by Atkins with input from a bat specialist and are enclosed in the planning application. Lighting along areas with bat potential has been designed to be bat friendly in line with UK guidelines contained in; Institution of Lighting Professionals; Guidance Note 08/18; Bats and artificial lighting in the UK (ILP 2018).

- *Habitat Linkages: Gaps in fences and walls should be incorporated (min: 13cm x 13cm) to allow small mammals to move around site.*

The overall site layout plan allows for mammal movement through the site. Potential for the development to impact on mammals is set out in Chapter 4 of the EIAR.

- *Green/Biodiverse roofs: full details of habitat creation types and techniques; the origin and composition of soils/compost to be used; the choice and composition of plant species (including the origin of same) and maintenance programme.*

Please refer to the Atkins drawing 'Proposed Green Intensive Courtyard and Extensive Roof Layout for details on apartment buildings courtyard build up and green roof build ups. The drawing specifies the various elements of the green roof build up. The combined thickness of all the elements used in the

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green roof build up from the top decking is 315mm. Sedum plants will typically reach heights of 100 – 150mm.

- *The Planting Plan and Planting Schedule is to be submitted and assessed - the plans should show the species to be planted at each location and the quantities of each species rather than unnamed symbols and an overall number.*

A suite of Planting Plan drawings by Park Hood are enclosed with the application. These include detailed planning schedules.

- *Submit a detailed levels plan, clearly illustrating the proposed level changes relative to the existing land form. The applicant should be in a position to demonstrate that adequate consideration has been given to universal access throughout the site i.e. 'Building for Everyone' & 'Part M in the Technical Guidance Documents.*

The site layout plan includes site levels of the proposed scheme. See also the Landscape Strategy Report by Park Hood which includes a section detailing the approach to universal access adopted throughout the scheme.

- *All ground floor units must have a min. of 1500mm planted buffer as per the 'Design Standards for New Apartments' (Dept. of Housing, Planning & Local Government),*

This is provided for as detailed on the enclosed Architectural drawings by Glenn Howells Architects.

- *The applicant is to provide a management plan for the proposed landscape design to ensure the success of the planting plan.*

As indicated in the enclosed Landscape Design Strategy Report, a Landscape Management and Maintenance Plan will be prepared to include details on weeding, spot herbiciding, watering, planting management, control of insects/diseases and grass mowing. Initial landscape operations will be undertaken by an ALCI member. This will address both new planting on site and existing trees and vegetation proposed to be maintained on site including any root protection requirements necessary.

- *The applicant shall submit for the written agreement of the Planning Authority a design rationale for the central/shaded location of play elements within the open space. In its current form the play provision dissects the open space area in Phase 3 and consideration should be given to reorientation it so the space can be used to its fullest.*

This relates to the Coastal Gardens Linear Park Area. The rationale for this and all play areas is set out in the Landscape Design Strategy. The development incorporates a number of different types of play area dispersed along the footpath / cycle way. This allows for impromptu play along the route in safe and secure location. As they are dispersed play spaces for younger children they can be accommodated into small areas and not impact on larger open space area between Block A and B which accommodates a focal sculpture.

- *The Layout Plan shall comprise the following: Showing types of play and play area(s), target age groups, landform (included levels and contours) and boundaries, gates and planting.*

Play areas are shown on dwg. no. 6948-L-2000 (Landscape Masterplan), the age group for each area are as detailed in the Landscape Strategy Report prepared by Park Hood.

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- *Open space calculations will need to be in accordance with the County Development Plan and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018. The applicant in their calculation of open space should omit, green roofs, sterilized land for services and attenuation, or areas that are generally not useable in any meaningful way and therefore considered incidental open space as per sections 8.2.8.2 and 8.3.8.3 of the CDP 2016 - 2022.*

Proposed open space is in accordance with the County Development Plan and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020. Further detail is provided in the Planning Report and Statement of Consistency.

- *The potential provision of a local bring centre element as part of the development proposal in line with Section 8.2.9.7 of the Dun Laoghaire Rathdown County Development Plan 2016-2022.*

Response

Separate waste storage facilities are proposed for organic waste, dry recyclable waste and residual waste. There is an existing recycling centre within Bray and a number of smaller recycling facilities. It is therefore not proposed to provide a local bring centre as part of the subject development.

- *“Details pertaining to areas to be managed by a management company, and details of any areas of the site proposed to be taken in charge by the Planning Authority as applicable,”*

Response

A drawing identifying the areas to be taken in charge *Proposed Taking in Charge* Dwg. No. BRA-GHA-SW-ZZ-DR-A-5007, has been prepared by GHA and is submitted as part of this application. This drawing shows that only an area of the pedestrian / cyclist / vehicle network is to be taken in charge, the remainder of the site will be managed by a management company.

- *“While not indicated as such, if the subject development or part thereof is proposed as build to rent (BTR), this must be clearly identified as such in the development description and public notices pertaining to the proposed development, in line with the provisions of SPPR7 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2020). In addition, if BTR is proposed, developments full compliance with the requirements of SPPR7 must be demonstrated.”*

Response

Block A is proposed as BTR. This is identified as such in the development description and public notice. Compliance with the requirements of SPPR7 are set out in the Planning Report and Statement of Consistency prepared by RPS.

- *“A Building Maintenance report will be required.”*

Response

Maintenance of the proposed development is considered in the Building Lifecycle Report prepared by Aramark. This identifies the maintenance requirements of different building elements which will form part of a building maintenance plan for future operators.

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2.10.2 Response to Wicklow County Council CE Opinion

The CE Opinion issued by *Wicklow County Council* states the following:

“More diversity should be considered within the design and pallet of materials used throughout the scheme, in particular for Blocks 1A and 1B. An adequate variety in form, height and materials etc. should be employed throughout to provide for visual diversity.”

Response

The proposed development has been further refined since the pre-application stage and there is now greater variety in form, height and materials. This is described in detail in the *Architectural Design Statement* and is considered to deliver enhanced visual diversity.

2.11 Item 11 - Landscape Drawings

“Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted.”

Applicant Response

Areas of hard and soft landscaping, useable communal open space, meaningful public open space and way finding, public, semi-private and private spaces are identified on, Public Open Space & Residential Amenity Areas Dwg. No. BRA-GHA-SW-DR-A-05006 prepared by GHA. The Landscape Masterplan Dwg. No. 6948-L-2000 by Park Hood Chartered Landscape Architects along with the associated suite of detailed landscape drawings present the details of hard and soft landscaping throughout the scheme, including planting plans and boundary treatment drawings.

Further details of play equipment, street furniture including public lighting and boundary treatments are provided in the *Landscape Design Report* also prepared by Parkhood Landscape Architect.

2.12 Item 12 – Surface Water Drainage

“A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.”

Applicant Response

Storm water drainage proposals for the site are set out in detail in the *Engineering Planning Report* and drawings prepared by Atkins Engineering. These are further detailed and assessed in the *Stormwater Impact Assessment Report* by Atkins and the *Flood Risk Assessment Report* by Atkins.

2.13 Item 13 - AA Screening Report

“An AA screening report which considers potential impacts on the Qualifying Interests of any Natura 2000 site.”

Applicant Response

AA screening which considers the potential impacts on the Qualifying Interests of any Natura 2000 site was undertaken by Atkins Engineering. The AA screening exercise could not rule out potential for impact on a Natura site and accordingly a Natura Impact Statement was prepared and is included in the application documentation. Reporting on the Stage 1 AA screening forms part of the overall Natura Impact Statement.

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2.14 Item 14 - Ecological Impact Assessment,

“An up to date Ecological Impact Assessment, inclusive of a Bird and Bat Survey.”

Applicant Response

‘Chapter 4 – Biodiversity’ of the EIAR comprises an Ecological Impact Assessment. Amongst other ecological matters, this assessment incorporates bird and bat surveys and impact assessments. All supporting ecological surveys (including bat and bird surveys) are provided in Appendix 4 – Biodiversity’ of the EIAR.

2.15 Item 15 - EIAR

“Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIAR screening.”

Applicant Response

An EIAR has been prepared, with Atkins Engineering co-ordinating the preparation of same. The EIAR is included in the application documentation.

2.16 Item 16 - Microclimate Impact Assessment

“A Microclimate Impact Assessment.”

Applicant Response

A *Wind Microclimate Modelling* report has been prepared by B-Fluid Ltd and is submitted with the application.

2.17 Item 17 - Taking in Charge

“A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.”

Applicant’s Response

A drawing identifying the areas to be taken in charge *Proposed Taking in Charge*, Dwg. No. BRA-GHA-SW-ZZ-DR-A-5007, has been prepared by GHA and is submitted as part of this application. This drawing shows that only an area of the pedestrian / cyclist / vehicle network is to be taken in charge, the remainder of the site will be managed by a management company.

2.18 Item 18 – C&D Waste Management

“Site Specific Construction and Demolition Waste Management Plan.”

Applicant Response

A *Construction and Demolition Waste Management Plan* has been prepared by Atkins Engineering and is submitted as part of this application.

2.19 Item 19 - Life cycle report

“A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all

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boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Applicant Response

A *Building Life Cycle Report* prepared by Aramark in accordance with section 6.13 of the *Sustainable Urban housing: Design Standards for New Apartments* (2020) is submitted as part of this application. The report has regard to the long-term management and maintenance of the proposed development.

2.20 Item 20 - Public Lighting

“Details of public lighting.”

Applicant Response

Details of proposed public lighting are provided on the *Proposed Public Lighting Layout Plans* (Sheets 1 and 2) (Drwg Nos. 5214419-ATK-01-ZZ-DR-EE-1301 and 5214419-ATK-01-ZZ-DR-EE-1302) and the accompanying *Public Lighting Report* (included as Appendix to MEP Engineering Report & Energy Statement) both prepared by Atkins.

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3 SPECIFIC INFORMATION TO BE SUBMITTED (PREVIOUS OPINION OF ABP-308291-20)

In its notice of 5th February 2021 in the initial pre-application consultation for development at Coastal Quarter, the Board set out 11 no. items of specific information that should be provided with the application. As the current application includes that part of the development previously permitted under ABP-311181-21, for clarity we also set out below how the specific information sought under that previous consultation phase is also now addressed in the current application.

3.1 Item 1 - Architectural Design Statement

“A report that addresses and provides a clear design rationale for the proposed height, density, design and character of residential units and details of the materials and finishes of the proposed development. Particular regard should be had to the requirement to provide high quality, robust and sustainable finishes and details which seek to create a distinctive character for the development, having regard to the coastal and highly visible location of the site.”

Applicant’s Response

An *Architectural Design Statement* prepared by Glen Howell Architects is submitted as part of the application and outlines the rationale for the height, density, design, scale, massing and character areas proposed throughout the site and details the materials and finishes to be used. Details of materials and finishes used to define character areas and open spaces are provided in the *Landscape Design Strategy* prepared by Park Hood Landscape Architects. Information is also included in the *Building Lifecycle Report* and the *Property Management Strategy Report* prepared by Aramark.

3.2 Item 2 - Proposed Housing Mix

“A report that addresses and provides a justification for the proposed housing mix.”

Applicant’s Response

A *Housing and Tenure Type and Mix Report* has been prepared by RPS and is submitted as part of this application.

3.3 Item 3 – Building Lifecycle Report

“A building life cycle report in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).”

Applicant Response

A *Building Life Cycle Report* has been prepared by Aramark and is submitted as part of this application, in line with section 6.13 of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)*.

3.4 Item 4 - Taking in Charge

“A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces.”

Applicant’s Response

A drawing identifying the areas to be taken in charge ‘*Proposed Taking in Charge Plan*’ Dwg. No. BRA-GHA-SW-ZZ-DR-A-05007, has been prepared by Glenn Howell Architects and is submitted as part of this application.

A Phasing Plan drawing, prepared by Glenn Howell Architects, Dwg. No. BRA-GHA-SW-ZZ-DR-A-05005 is also submitted as part of this application.

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3.5 Item 5 - Part V Provision

“A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces and Part V provision.”

Applicant’s Response

A phasing plan has been prepared by Glenn Howell Architects and is enclosed in the application: Dwg. No. BRA-GHA-SW-ZZ-DR-A-05005. This drawing shows the proposed development comprises 3 no. phases. The public space within each phase will be brought forward as part of that phase.

All Part V provision in County Wicklow is located within Block C and will be delivered in Phase 1B. All Part V provision in Dún Laoghaire-Rathdown is located within Block D and will be delivered in Phase 2B.

3.6 Item 6 - Childcare Demand Analysis

“Childcare demand analysis, including but not restricted to the justification for size of the proposed crèche, having regard to the existing childcare facility in the vicinity of the site, the likely demand and use for childcare places and the accommodation of additional requirement resulting from the proposed development.”

Applicant’s Response

A *Childcare Demand Analysis Report* has been prepared by RPS and is submitted as part of this application.

3.7 Item 7 - School Demand and Concentration Report

“School Demand and Concentration Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.”

Applicant’s Response

A *School Demand and Concentration Report* has been prepared by RPS and is submitted as part of this application.

3.8 Item 8 - Landscape and Permeability Plan

“A landscape and permeability plan of the proposed open spaces within the site clearly delineating public, semi-private and private spaces, areas to be gated and proposed boundary treatments, in particular the eastern boundary at the interface with the railway line.”

Applicant’s Response

Details of public, semi-private and private spaces are identified on, Public Open Space & Residential Amenity Areas Dwg. No. BRA-GHA-SW-ZZ—DR-A-05006 prepared by Glenn Howell Architects and is submitted as part of this application. In addition, the *Architectural Design Report* prepared by Glenn Howell Architects details further the permeability of the proposed open spaces within the site and the delineation of public, semi-private and private spaces. The landscape elements are further discussed in the *Landscape Design Strategy* and associated drawings prepared by Park Hood Landscape Architects and are submitted as part of this application.

Along the eastern boundary of the site a linear landscape and park located between the development and the existing railway line is proposed. This shall provide pedestrian and cycle connections to existing landscape features including Corke Abbey Valley Park / Woodbrook Glen and the River Dargle linear parks. The Coastal Gardens will create a meandering footpath/cycleway link along the eastern boundary and will have large swathes of meadow, ornamental grasses and herbaceous planting all of which shall be coastal tolerant. Along the full length of the railway embankment to the east will be a solid 2.4m high wall as required by C oras Iompair  ireann. Boundary treatments are further detailed in the suite of boundary treatment drawings prepared by Park Hood Landscape Architects.

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3.9 Item 9 - Traffic and Transport Assessment

“Submission of a Traffic and Transport Assessment, including a quality audit of the junctions and road network between the proposed entrance and Castle Street / Dublin Road. The audit should include details of the capacity of the surrounding road network and the impact of the proposed development, details of available sightlines, pedestrian and cycle facilities and recommendations for potential improvements to the public road, if required.”

Applicant’s Response

A *Traffic and Transport Assessment* and a *Quality Audit* have been prepared by Atkins and are enclosed in the planning application. The *Traffic and Transport Assessment* reports on analysis undertaken on all relevant junctions on R761 Dublin Road (including both existing and future development access junctions).

The assessment includes a sensitivity analysis for varying modal distribution as well as the closure of the Ravenswell Road access (if required). All junctions are expected to perform at an acceptable level of services for all future scenarios.

The *Quality Audit* comprises an access audit, a walking and cycling audit and a Stage 1 Road Safety Audit.

3.10 Item 10 - Archaeological Impact Assessment

“Submission of an Archaeological Impact Assessment.”

Applicant’s Response

An Environmental Impact Assessment Report (EIAR) coordinated by Atkins is submitted as part of the application documentation. The Cultural Heritage Chapter of the EIAR includes an archaeological impact assessment. This chapter was prepared by John Cronin & Associates.

3.11 Item 11 - Statement of Material Contravention

“Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective (s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format. The notice and statement should clearly indicate which Planning Authority statutory plan it is proposed to materially contravene.”

Applicant’s Response

A *Statement of Material Contravention* has been prepared by RPS and is submitted as part of this application. The statutory notice pursuant to section 8(1)(a) of the Act of 2016 and article 292 (1) of the Regulations, has been clearly worded noting the proposed development materially contravenes the planning authority’s statutory plan.

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4 CONCLUSION

This report details where the specific items requested by the Board to be included in the application are to be found and clarifies the nature and extent of the documentation provided.

In addition to these particular items, the overall application package provides all of the plans and particulars required under the Planning and Development (Housing) and Residential Tenancies Act 2016 and the Regulations made thereunder.

As the current application incorporates the development previously permitted under ABP Ref. 311181-21, for clarity we have also confirmed where the current application provides specific information which was sought by An Bord Pleanála under the previous consultation phase ABP Ref. 308291-20.

In conclusion, it is respectfully submitted that the documentation provided with this application presents clear and detailed information on the nature and extent of the development proposed, design and operational rationales for the proposals along with robust environmental and other assessments of the potential impacts of the proposed development. These assessments conclude that the development is consistent with the proper planning and sustainable development of the area and identifies no significant adverse impacts. Accordingly, it is submitted that the development should be permitted by the Board.