

Planning Department,
South Dublin County Council,
County Hall Tallaght,
Dublin 24,
D24 A3X

Land Use Planning & Transportation

15 NOV 2021

South Dublin County Council

15th November 2021

[By Courier]

Dear Sir/Madam,

RE: RESPONSE TO ADDITIONAL INFORMATION REQUEST IN RELATION TO A PROPOSED MIXED USE DEVELOPMENT AT ST. BASIL'S TRAINING CENTRE, GREENHILLS ROAD, TALLAGHT, DUBLIN 24.

SOUTH DUBLIN COUNTY COUNCIL REG. REF. SD21A/0139

1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, 80 Harcourt Street, Dublin 2 is instructed by our client, O'Mahony Holdings SPRL, to respond to the *Additional Information Request* issued by South Dublin County Council on 22nd July 2021. The proposed development relates to the construction of a residential development and associated site works at the above-referenced address.

The *Additional Information Request* (AIR) outlines 12 no. points, which would be required to be addressed in relation to the proposed development. These are outlined and responded to in greater detail below.

This Response was prepared in association with the following members of the design team:

- TOT Architects;
- Murphy + Sheanon Landscape Architects;
- PUNCH Consulting Engineers;
- ARC Architectural Consultants (Conservation Specialists);
- Philip J Architects;
- Metec Engineering Consultants; and
- Redline Studio (CGI and Photomontages Specialists).

A full list of the enclosed supporting assessments, reports and drawings accompanying this *Response to Request for Additional Information* is provided below in Section 3.0 'Summary of Enclosures'.

TOWN PLANNING CONSULTANTS



2.0 RESPONSE TO ADDITIONAL INFORMATION REQUEST

2.1 Item No. 1

Item 1 of the *Additional Information Request* states:

'(a) The proposed plot ratio exceeds the maximum plot ratio in the Village neighbourhood area by 63%, as per section 3.4 of the Tallaght Town Centre Local Area Plan. Though the heights are indicated as being allowable under the Plan, the transition in height and character of Block B is not acceptable relative to its context on Old Greenhills Road, part of the ACA. The applicant is requested to reduce the scale/intensity of the proposed development to comply with the Tallaght Town Centre Local Area Plan 2020 - 2026, and to comply with the requirements of the SDCC Architectural Conservation Officer.

(b) In particular, the 5-storey element of Block B should be set further back from the northern boundary or lowered. The proposed treatment would have an overbearing visual impact and subsequently impact the residential amenity to adjoining terraces'.

Response

In relation to the scale/intensity of the proposed development, the Planning Authority considered that the proposed plot ratio of 1.95 would significantly exceed the indicated plot ratio range of between 0.75:1 (low) and 1:1 (High) for new developments in The Village of Tallaght.

In response to this, we refer the Planning Authority to the enclosed revised architectural drawing pack and accompanying *Architect's Design Rationale Additional Information*, prepared by TOT Architects.

We submit that full consideration has been given to both Section 6 of the Tallaght LAP and comments provided by the Planning Authority in relation to the application. A number of amendments have taken place to address these concerns and reduce the overall scale and intensity of the scheme. As a result, in summary, the following notable changes have occurred:

	Submitted Scheme	Amended Scheme
No. of residential units	40	37
Development GFA	4,779.97 sq m	4 518,27 sq m
Max. Building Height (excl. lift overrun)	Block A: 21m (5-6 storeys) Block B: 17m (3-5 storeys)	Block A: 19.8m (5-6 storeys) Block B: 14m (3-4 storeys)
Plot Ratio	1.63	1.52
Gross Density	c. 173	c. 158



A reduction in scale, intensity and plot ratio has been achieved by way of a proposal for a total of 37 no. apartment units and a decrease in building heights (discussed below) in the modifications proposed under the response to the AI Request.

In our opinion, the delivery of the development at the indicated plot ratios (as per Section 3.4 of the Tallaght LAP) on zoned serviced land, on a high-frequency transport corridor, would not facilitate the sustainable or optimal use of the land. It would also be counter to overarching themes of the NPF which seeks to make better use of "*under-utilised land, including 'infill' and 'brownfield' and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport*".

Additional to the plot ratio concerns, the Planning Authority considered that the proposed gross density (173 units/ha) would not respond to the context of the site and surrounding Village area, albeit it was accepted that the subject site falls under 'Central and/or Accessible Urban Locations' category, as per *the Apartment Guidelines 2020*, which are generally considered suitable for small to large scale and higher density development.

We contend that the design of the scheme has been fully informed by site specific assessments based on the scale and local historical characteristics of the surrounding area. Significant changes have occurred at the boundary with No. 3 Greenhills Road, as suggested by the Planning Authority, and the reduction in height of Block B has decreased the overall gross residential density and the plot ratio. It is further submitted that the delivery of development at a significantly lower density and plot ratio than proposed could potentially prejudice the delivery of much-needed housing and high-quality development, particularly given that the subject site lies predominantly outside the Tallaght ACA.

Notwithstanding the above, the Tallaght LAP identifies indicative building heights for new development on the subject site (and the adjoining southern/western site) of between 4 - 6 storeys for residential or 3 - 5 storeys commercial development. In our opinion, the concerns raised by the Architectural Conservation Officer conflicts with the building height strategy for The Village (shown in Figure 1.0 overleaf) which is informed by best practice urban design principles as per the *Urban Development and Building Height Guidelines for Planning Authorities (2018)* and site-specific assessments.



Figure 1.0 Extract from Figure 3.10 of the LAP showing the overall urban structure and building heights within The Village, with the application site outlined in red (Source: Tallaght LAP, cropped and annotated by Tom Phillips + Associates 2021.)

The proposed development, which ranges in height from 3 - 6 storeys, fully complies with building height and built form prescribed by Section 2.6.2 of the Tallaght LAP. The key consideration in this instance relates to the conflicts within the Tallaght LAP, whereby the goal is to facilitate sustainable patterns of development which represent optimal land-use solutions, on zoned serviced lands, in close proximity to existing (Bus Route No. 27, among others) and future (Bus Connects) high-quality public transport, while simultaneously limiting the density and plot ratio based on the sensitive local character and historical context.

We submit that the overall design, height and mass of the proposed development are sensitive to Main Street and adjacent to the cultural/historic core and complies with Tallaght LAP. This opinion is also shared by ARC, Architectural Conservation Consultants (Refer to the enclosed *Addendum Architectural Heritage Impact Assessment in response to a Request for Further Information*, prepared by ARC). On the basis of the foregoing, it is reasonable that the height, density and plot ratio of the amended proposal should be considered favourably by the Planning Authority.

As briefly discussed above, in response to Item 1(b) specifically, Block B has been lowered and the materials simplified, as recommended by the Planning Authority, and will therefore not dominate existing structures to the north (cottages and St. Basil's Training Centre PS) and west (The Priory and associated structures) of the site. We refer the Planning Authority to enclosed Drawing No. 19118_AI-105_Proposed Contiguous Elevations, prepared by TOT Architects, which shows that many of the Priory buildings are at a much larger height and scale than the proposed development and largely screened by existing mature vegetation which occupies the grounds.



Figure 2.0 Original Block B elevations along Old Greenhills Road (source: Extract from Drawing No. 19118_PA-104_Proposed Site Elevations, prepared by TOT Architects)



Figure 3.0 Amended Block B elevations along Old Greenhills Road (source: Extract from Drawing No. 19118_AI-104_Proposed Site Elevations, prepared by TOT Architects)

Additionally, proposed Block B will not be visible on approach from the west/east of Main Street as demonstrated in the accompanying assessments due to its generous setback from this street frontage (c. 40 m). It is envisaged that the development of the adjoining southern/western vacant site in the future will fully conceal the visibility of the proposed development and dissolve all visual impact concerns raised by the Planning Authority (see also Section 6.0 of the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects).



2.2 Item No. 2

Item 2 of the *Additional Information Request* states:

'(a) The applicant is requested to respond to the following comments of the Architectural Conservation Officer in relation to the density, scale and impact on the adjoining protected structure and architectural conservation area, and how a revised scheme overcomes these issues. "Having assessed the details of the planning application and based on the above it is considered that the applicant has failed to address the overall visual impact that the scale and height of the proposed development will have within this prominent location, which is adjacent to a Protected Structure (St. Basils), within close proximity to Tallaght Architectural Conservation Area (ACA) and a significant Protected Structure Site, 'The Priory'. It is considered that the proposed development by nature of its close proximity, scale and height will directly impact on the visual quality adjoining Protected Structure site, St. Basils Training Centre (former National School, RPS Ref.268). Concerns remain in that the character of the ACA will be significantly affected by the proposed apartment blocks as the new build will completely dominate the entire block which is highly visible on approach from Main Street and The Priory Demesne. The consequences of the proposed development may result in a diminished quality of character, which fails to address and adhere to existing policies for new development within or in close proximity to an ACA in line with SDCC County Development Plan (2016-2022) and chapter 6 of the Tallaght Local Area Plan 2020. It is considered that the proposed design with the use of light coloured brick and the insertion of brick design elements, tries to reflect elements of the existing building stocks palette. The overall finish and material type try to address the issue of a contemporary design which reflects the existing built environment and provides a level of interest and quality in providing a new build of interest is a welcomed part of the proposal. However, given that the issue of building height and mass of the proposed blocks, the overall impact cannot be negated by the design alone and therefore more consideration needs to be given to the site context and adjoining built environs."

(b) An architectural design statement has been provided as part of the planning application however an Architectural Impact Assessment has not been provided nor has details been provided in accordance with the items advised in the Tallaght LAP, with regard to new development within or adjoining the ACA. Please provide same'.



Response

In response to Item 2, we refer the Planning Authority to the following enclosed documents:

- Revised architectural drawing pack and accompanying *Architect's Design Rationale Additional Information*, prepared by TOT Architects;
- *Addendum Architectural Heritage Impact Assessment In response to a Request for Further Information*, prepared by ARC;
- *Landscape and Visual Impact Assessment (LVIA) Revision A*, prepared by Philip J Landscape Architecture; and
- *Photomontage Booklet*, prepared by Redline Studios.

2.3 Item No. 3

Item 3 of the *Additional Information Request* states:

'From the layout provided, it is not clear that there is a need to demolish this block in its entirety, rather than building a new integrated southern wing produce the corner block. Given the actual changes sought to this recent construction, demolition of the existing building appears to be an extreme measure. The applicant is requested to address the necessity of demolishing the 3-storey block and consider a less wasteful approach to redevelopment of the site, and address this by additional information.'

Response

In response to Item 3, we refer the Planning Authority to Section 3.6 of the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects, which provides a rationale as to why the retention of the existing 3 storey building is not feasible.

2.4 Item No. 4

Item 4 of the *Additional Information Request* states:

'The proposed floor plans appear to show upper floors of Block B overhanging ground floor terraces, and balconies overhanging the public footpath. The applicant is requested to provide clarity with regard to any overhang over the public footpath, and if necessary obtain a letter of consent from the Council's Property section, to be submitted as additional information.'

Response

In response to Item 4, we refer the Planning Authority to the enclosed amended architectural drawing pack and Section 3.3 of the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects. No balconies will overhang the public footpath.



2.5 Item No. 5

Item 5 of the *Additional Information Request* states:

'a) Block A presents a light brick and spandrel panelled façade to the south and east in its southern section, with brick-clad columns at ground floor level around a glass-panelled café unit. This would be prominent and is an attractive façade in principle as seen from the east. Further north, however, the façade proposed is a busy and complicated mesh of overlapping material treatments, with little detailing, to break up the wide facade. The elevation could be simplified, with detailing or relief methods used to break up the mass, rather than irregular changes in material treatment. The applicant is requested to address this by additional information.

(b) Block B has a two-tone brick façade which appears to be used to break up the mass, and exposed stiel columns to the front at ground level. The design features windows which are not vertically aligned, and ground floor terraces which would sit under the underside of the first floor, with narrower balconies above. These balconies appear to jut out over the public footpath. In trying to break up the mass of this 5-storey infill, the unaligned windows and change of brick tones are unnecessarily complicated. The applicant is requested to adjust this design by additional information. It is recommended to seek the comments of the Architectural Conservation Officer in relation to the appropriate treatment of Block B'.

Response

In response to Item 5, we refer the Planning Authority to the enclosed amended architectural drawing pack and Section 3.3 of the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects, which show the proposed amendments which address the treatment of the building facades.

2.6 Item No. 6

Item 6 of the *Additional Information Request* states:

'The provision of a 5-storey development at Block A brings concerns regarding increased overlooking to the private rear gardens of the existing terrace of 3 beds on Old Greenhills Road. Windows from the circulation lobby of Block B face directly into the single-storey terraces, and rear-facing bedroom windows from the northernmost units within Block B would provide a much higher view into the garden than would normally be expected of side-on development of equivalent height. The applicant is requested to make necessary revisions to reduce the risk of overlooking and loss of privacy to the adjoining site'.

Response

In response to Item 6, we refer the Planning Authority to the enclosed architectural drawings and the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects which illustrates the amended scheme in response to the above concerns. In summary, in addition to the decrease in building height of Block B, the roof terrace now includes additional screening and the windows on the eastern elevation have been relocated to avoid any undue overlooking into the amenity spaces of neighbouring properties.

2.7 Item No. 7

Item 7 of the *Additional Information Request* states:

'The applicant has submitted a Sunlight & Daylight Assessment for the proposed development. There are some problems with this assessment which can be revised by additional information:

- Of the east-facing windows of the existing scheme at Greenhill Court, the southernmost windows (of those not proposed for demolition) are not assessed for daylight or sunlight. These should also be assessed for impact on vertical sky component. These serve living/kitchen rooms, and will be impacted in some way by Block A, which shall jut out in an eastward direction directly to the south of these windows. From the drawings it would appear that Block A will project out beyond a line drawn 45 degrees on a horizontal plane from the centre of these windows.

- The rear garden of No. 3 Old Greenhills Road is shown on page 41 of the Assessment to lose a significant share of sunlight in the proposed scenario on March 21st. It appears from the image that the garden currently receives 4-5 hours of sunlight, but would now receive less than 2 across its entire surface. Yet, this plot is not mentioned in the assessment text. As per the BRE guidelines, if the resulting area which can receive 2 hours of sunlight a day is less than 0.8 of its previous value, then the loss of sunlight is likely to be noticeable, and this would not be acceptable in this instance, and a reduction in scale of the development would be required to avoid the overshadowing. Even if the guidelines were to be technically complied with, the Planning Authority would consider such the proposed loss of private amenity to the neighbouring dwelling to be unacceptable'.

Response

In response to Item 7, we refer the Planning Authority to the enclosed revised *Daylight, Sunlight and Shadow Assessment*, prepared by Metec Consulting Engineers, which addresses concerns relating to sunlight and daylight.

2.8 Item No. 8

Item 8 of the *Additional Information Request* states:

'The Roads Department has assessed the proposal and has recommended a request for additional information on the following grounds:

(a) All items and areas for taking in charge including areas currently in SDCC's charge shall be undertaken to a taking in charge standard. Prior to development the applicant is requested to submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.

(b) The applicant is requested to submit details on location and number of parking spaces to be provided at the development. Please refer to Table 11.23: Maximum Parking Rates (Non-Residential) – from the SDCC County Development Plan 2016-2022. The Planning Department does not consider that these maximum standards need to be met in every instance; however the loss of 4 underground parking spaces which are used by residents of the existing scheme, and lack of additional spaces in the context of a net increase of 23 apartments, is not acceptable to the Planning Authority.

(c) The applicant is requested to submit a revised layout showing the car parking, bicycle parking and pedestrian routes within the development. Please refer to Table 11.22: Minimum Bicycle Parking Rates– SDCC County Development Plan 2016-2022.

(i) The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users. (ii) All external bicycle parking spaces shall be covered.

(iii) Footpath layout shall provide adequate connectivity around the development and footpaths on the main road.

(d) The applicant shall provide a 5% of vehicular parking spaces for mobility impaired users, and 10% vehicular parking spaces to be equipped with electrical charging points. The Roads Report contains commentary as to the inadequacy of the proposed parking provision when compared to the South Dublin County Development Plan 2016 - 2022 maximum standards. The Planning Department does not consider that these standards need to be met in every instance. However, the loss of 4 underground parking spaces which are used by residents of the existing scheme, and lack of additional spaces in the context of a net increase of 23 apartments, is not acceptable to the Planning Authority. In relation to number 3 above, the applicant should set out a scheme that does not result in the loss of existing amenities'.



Response

In response to Item 8(a), we refer the Planning Authority to the enclosed *Response to SDCC Request for Further Information*, prepared by PUNCH Consulting Engineers. In summary, no new areas are proposed to be taken in charge as part of the proposed development.

In response to Item 8(b), the quantity of car parking provided to serve the scheme remains unchanged, i.e., 13 no. spaces at basement level and 2 no. Go Cars at surface level due to reasons outlined in the *Response to SDCC Request for Further Information*, prepared by PUNCH Consulting Engineers. It is submitted that the proposed basement provides an improved design and manoeuvring of vehicles will be vastly improved compared to the existing basement as a result of the proposed development (Refer to Drawing No. 202253-PUNCH-XX-XX-DR-C-0601, prepared by PUNCH Consulting Engineers). Additionally, it is confirmed by the Applicant that the residents of the existing Greenhills Court scheme do not currently use the existing basement car park (Refer to the enclosed letter, prepared by the Applicant O' Mahony Holdings SPRL) and it appears that no resident objected to the loss of 4 underground parking spaces.

Furthermore, the Applicant is willing (and always has been) to work with the owner of the adjoining corner site in order to facilitate the possible further extension of the basement level car park to serve both the proposed development and any future development on this vacant site.

We contend that the level of car parking proposed is wholly acceptable based on the sites highly accessible urban location, as referred to in the guidance set out in the *Apartment Guidelines, 2020*, whereby there is a default policy for car parking provision to be minimised, substantially reduced or wholly eliminated in more central locations that are well served by public transport. The site is in a highly accessible urban location, proximate to employment and higher order services and facilities within Tallaght. The site is also proximate to existing and proposed high frequency public transport services. In our opinion, the location of the site is suitable for reduced car parking provision based on the criteria set out in the Guidelines.

Based the bicycle parking standards set out for residential units in the *Apartment Guidelines, 2020*, and the bicycle parking standards for non-residential uses (Café) within the Development Plan, a total of 89 no. bicycle spaces are required to serve the proposed (and existing) development, 94 no. in total are proposed. This includes 74 no. secure long stay, secure, bicycle parking spaces at basement level and 20 no. short-stay bicycle parking spaces at ground floor level, in highly visible locations for ease of use by the general public.

In response to Item 8(c)(i) and 8(c)(iii), we refer the Planning Authority to the enclosed revised Landscape Plan (Drawing No. 361-DD-01 (REV B)), prepared by Murphy + Sheanon, Landscape Architects. The majority of footpaths are a minimum of 1.8m wide. The majority are 2m wide. There are a few exceptions, however. These exceptions relate to existing site constraints relevant to the existing residential scheme and its proximity to the site boundary. Footpath widths in this area vary from 1.5m to 2m+. There is adequate footpath connectivity provided within the proposed development and on main roads within the Applicant's ownership.



Should the Planning Authority require specific upgrades to the footpaths, the Applicant is happy to accept a condition in this regard, should permission be granted.

In response to Item 8(c)(ii), we refer the Planning Authority to Section 3.4 of the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects, which provides justification as to why the external short-stay bicycle parking cannot be covered.

In response to Item 8(d), we refer the Planning Authority to Drawing No. 19118_AI-206_Proposed Basement-A1-P, prepared by TOT Architects, which shows 2 no. EV charging spaces and a vehicular mobility parking space located at basement level.

2.9 Item No. 9

Item 9 of the *Additional Information Request* states:

'(a) The proposed surface water attenuation of 70m³ is undersized by 45% for a 1 in 10 year flood event. The applicant is requested to submit revised plans and calculations showing surface water attenuation increased by 45% for 1:100 year flood event. Where possible provide surface water attenuation by means of SuDS (Sustainable Drainage Systems).

(b) The applicant should consider the use of hydro breaks at roof level to attenuate surface water on green roofs'.

Response

In response to Item 9, we refer the Planning Authority to the enclosed *Response to SDCC Request for Further Information*, prepared by PUNCH Consulting Engineers.

2.10 Item No. 10

Item 10 of the *Additional Information Request* states:

'The Planner's Report for Reg. Ref. SD20A/0250 which was refused permission, stated the following: 'there is a strong desire to see the whole site developed in a way that utilises the vacant land to its an appropriate potential whilst still respecting the character of the area. The current proposal would see a large section of the old petrol filling station site vacant as well as the strip of land to the east.' The Planning Authority would prefer to see these two sites developed together as an integrated scheme, with undivided and generous communal amenity space at its centre and no restrictions on, for instance, fenestration in the western elevation of Block B. The applicant is requested to engage with the adjoining land owner, who has written in support of this development, and to provide the Planning Authority with a masterplan showing integrated development of both sites, to provide a satisfactory impression of what the full development of these sites would look like'.



Response

In response to Item 10, we submit that the Applicant also has a strong desire to see the whole site developed and this is evident by the various attempts made by the Applicant, O'Mahony Holdings SPRL, to either purchase the adjoining site, or come up with an integrated design solution for both sites combined (Refer to the enclosed timeline letter, prepared by the applicant). Most recently, as a result of the AI Request, the Applicant again approached the adjoining landowners and made a further offer to purchase the site. Despite a meeting taking place to discuss this offer at length, it was not accepted. We contend that the Applicant's hands are very much tied and has no option but to continue with the planning process for this application.

As discussed previously in Section 2.1 above, the adjoining southern corner site is earmarked for a building (or buildings) of between 4 - 6 storeys for residential or 3 - 5 storeys commercial development (as per the building height strategy within the Tallaght LAP). As such, TOT Architects have provided a fully comprehensive design rationale which outlines the various design solutions which have been explored and included as part of the proposed development which will allow for both sites to be fully integrated in the future (Refer to Section 6.0 of the enclosed *Architect's Design Rationale Additional Information*, prepared by TOT Architects). In addition, as shown in on Drawing Nos. 361-DD-01 (REV B), prepared by Murphy + Sheanon Landscape Architects, the central communal open space can also be extended to allow for a larger, undivided open space, with perimeter blocks on three sides.

2.11 Item No. 11

Item 11 of the *Additional Information Request* states:

'The applicant is requested to provide a full suite of planning drawings as per the usual requirements of the Planning Regulations 2001, as amended, to accompany the submission of additional information. CGIs are also requested of a revised scheme'.

Response

A full suite of documents and drawings have been provided as per the above (6 no. copies).

2.12 Item No. 12

Item 12 of the *Additional Information Request* states:

'The applicant is requested to provide a revised Landscape Plan taking account of the revised scheme submitted as additional information. The Plan should include site sections showing landscape specifications'.



Response

In response to Item 12, we refer the Planning Authority to the enclosed revised Landscape Plans (Drawing Nos. 361-DD-01 (REV B) and 361-DD-02 (REV B)), prepared by Murphy + Sheanon, Landscape Architects. The revised *Landscape Design Report* includes landscape site sections showing landscape specifications



3.0 SUMMARY OF ENCLOSURES

Six copies of the following documents and related drawings are enclosed as part of this *Response to Additional Information Request*:

Architectural Drawings

- 6 No. sets of the requisite amended architectural plans, sections and elevations are provided by TOT Architects. (Please refer to the enclosed drawing register from the Architect)

Landscaping Drawings

- 6 No. sets of a requisite amended landscaping plan as prepared by Murphy + Sheanon Landscape Architects.

Engineering Drawings

- 6 No. sets of requisite amended engineering plans and drawings, as prepared by PUNCH Consulting Engineers

Reports

- 6 No. copies of the '*Architect's Design Rationale*', prepared by TOT Architects.
- 6 no. copies of the '*Landscape Design Report*', prepared by Murphy + Sheanon Landscape Architects.
- 6 No. copies of the '*Addendum Architectural Heritage Impact Assessment In response to a Request for Further Information*', prepared by ARC Architectural Consultants.
- 6 No. copies of the '*Response to SDCC Request for Further Information 202253-PUNCH-XX-XX-RP-C-0008*', prepared by PUNCH Consulting Engineers.
- 6 No. copies of the revised '*Daylight, Sunlight and Shadow Assessment*', prepared by Metec Consulting Engineers.
- 6 No. copies of the revised '*Landscape and Visual Impact Assessment*', prepared by Philip J Landscape Architecture.
- 6 no. copies of the '*Verified Photomontage*' booklet prepared by Redline Studio.
- 6 no. copies of '*Response to Item 10 of the Additional Information Request (Re. Ref. SD21A/0139)*' letter, prepared by O'Mahony Holdings SPRL (the Applicant).



4.0 CONCLUSION

This submission addresses, in full, issues raised by the Planning Authority in the *Additional Information Request*, dated 22nd July 2021.

This submission has been made prior to the deadline date of 31st January 2022.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of this area and that the issues raised in the Planning Authority's *Additional Information Request* have been fully addressed by this Response and the enclosed supporting material.

Accordingly, we would ask the Planning Authority to expedite a favourable decision in respect of this application.

Yours sincerely

John Gannon
Director
Tom Phillips + Associates

Encl.