
Statement of Response to Pre-Application Consultation Opinion

Strategic Housing Development

Dolcain House, Monastery Road, Clondalkin, Dublin 22

Randelswood Holdings Ltd.

January 2022



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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Statement of Response to Pre-Application Consultation Opinion on behalf of our clients, Randelswood Holdings Ltd., to accompany a planning application to An Bord Pleanála for proposed Strategic Housing Development on a site of approximately 0.81 ha (2.00 acres), located at Dolcain House, Monastery Road, Clondalkin, Dublin 22. Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was facilitated on 30th September 2021.

An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 18th November 2021, which identified 1 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. The matters were as follows:

1. Pedestrian and Cycle Access

Further consideration of the documents as they relate to pedestrian and cycle access to/from the proposed development is required, in particular how the nature of this access/movement may alter as a result of the change of use from 'employment' to residential use. Consideration should include recognition of desire lines to public transport connections, particularly the Red Cow Luas stop to the east. As part of this, a pedestrian/cycle movement safety audit which would provide details of the scale of pedestrian movement associated with the existing office use, compared to that anticipated with the proposed residential use; along with a description of pedestrian and cycle routes from the site to surrounding areas; as well as any mitigation measures to ensure safe access and egress to the site for pedestrians and cyclists would assist, and demonstrate that these issues have been integrated in to the design of the scheme. Further consideration may require an amendment to the documents and/or design proposals submitted.

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the provision of the following specific information should be submitted with application for submission:

- 1. Consideration is required of potential impacts upon the future residential populations of the proposed development on the site, resulting from the existing adjacent quarry use (noting that the applicant has no control over this use). Comprehensive air quality and noise assessments are required with monitoring of basis line levels to be undertaken from the subject site. Any mitigation should be clearly described alongside any measures to preserve mitigation features.*
- 2. Consideration is required of any matters that have potential to be material contraventions of the Development Plan, with submission of a statement regarding the same if required.*
- 3. Landscape drawings clarifying the quantum of public open space proposed and the quality, functionality / usability of the public open space. Any deviation from policy requirements should be highlighted and consideration as to whether a material contravention arises.*
- 4. A plan of landscape proposals clearly delineating communal and private spaces should also be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.*
- 5. A Daylight, Sunlight and Overshadowing Assessment is required to demonstrate how the proposed development responds to recommendations in the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (the BRE guidelines). The methodology of the BRE guidelines should be followed and clearly stated within the submitted assessment. Analysis of all proposed units on each floor should be provided until it can be demonstrated that all units on a floor meet recommended targets, at which point it can be logically assumed units above will also pass (where a stacked arrangement to room use is proposed). APSH analysis of both the proposed accommodation and*

existing properties should be provided. Overshadowing analysis of all exterior amenity areas both within the development and in surrounding areas should also be provided.

6. *A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.*
7. *If telecommunications equipment is located on existing structures on the site, consideration is required on any potential impact as a result of the proposed works.*
8. *Details of waste storage and collection.*
9. *Details of Part V housing and evidence of discussion with the housing authority regarding the same.*
10. *Additional details and/or revised proposals in relation to ecology and a bat survey having regard to the comments of the Planning Authority.*
11. *Additional details and/or revised proposals in relation to comments from Transportation Planning at the Planning Authority.*
12. *Additional details and/or revised proposals in relation to comments from the Drainage Division at the Planning Authority.*
13. *A Housing Quality Assessment with regard to relevant national and local planning policy on residential development.*
14. *The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.*

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. The Department of Culture, Heritage and the Gaeltacht
2. The Heritage Council
3. An Taisce
4. Irish Water
5. Transport Infrastructure Ireland
6. National Transport Authority
7. South Dublin Childcare Committee

2.0 Response to Issues Raised

The following sets out how the applicant and design team have addressed the issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1 Item No. 1

The Board required the following:

Further consideration of the documents as they relate to pedestrian and cycle access to/from the proposed development is required, in particular how the nature of this access/movement may alter

as a result of the change of use from 'employment' to residential use. Consideration should include recognition of desire lines to public transport connections, particularly the Red Cow Luas stop to the east. As part of this, a pedestrian/cycle movement safety audit which would provide details of the scale of pedestrian movement associated with the existing office use, compared to that anticipated with the proposed residential use; along with a description of pedestrian and cycle routes from the site to surrounding areas; as well as any mitigation measures to ensure safe access and egress to the site for pedestrians and cyclists would assist, and demonstrate that these issues have been integrated in to the design of the scheme. Further consideration may require an amendment to the documents and/or design proposals submitted.

2.1.1 Applicants Response to Item No. 1

Following receipt of the Board's Notice of Pre-Application Consultation Opinion on 18th November 2021 and the discussion regarding this item at the Tri-Partite meeting on the 30th September 2021, the design team examined the pedestrian and cycle access to and from the development with particular attention given to the desire lines to and from Dolcain House. The Design Team have also engaged with the Roads and Transport Department of South Dublin County Council via email correspondence and meetings in November and December 2021 which have informed the proposal being submitted to the Board.

The proposed development being submitted to the Board provides for 2 no. options. Option A provides for a footpath along the southern side of Monastery Road on the lands within the control of the applicant. The applicant does not have any legal interest in the adjoining third party lands and accordingly can only provide the footpath within their legal ownership. The second option (Option B) provides for the omission of the footpath at this stage noting safety concerns arising from the Pedestrian and Safety Audit with the applicant willing to accept a condition requiring the land to be reserved for the provision of a footpath and contribution towards same, which will be constructed when the adjoining third party lands are developed. The 2 no. options are being proposed in light of discussions with South Dublin County Council who indicated that their preference would be to provide a footpath, with their preferred option to be the provision of a footpath through the subject lands to the south of the existing hedgeline to the roundabout to the east. This path predominantly traverses third party lands and accordingly is beyond the remit of the applicant who does not have legal right to propose or construct a path on these lands. The applicant is therefore proposing a footpath along Monastery Road (which would connect to the footpath permitted under SD10A/0064 when these lands are developed). However, it is noted that the adjoining lands have not yet been developed and until such time that the lands are developed by a third party or by South Dublin County Council, the provision of a footpath as proposed in Option A would result in a footpath abruptly ending with potential pedestrian safety issues. This was confirmed in a Movement Safety Audit which is enclosed with this application. Therefore, Option B is being proposed which does not provide for a footpath. The applicant wishes to confirm to the Board that there is no objection to a condition requiring the reservation of these lands for a footpath to be provided in the future in conjunction with footpaths on the adjoining lands. The 2 no. options are submitted for the consideration of the Board and are discussed further below in this response.

In addition, both options propose a new dedicated pedestrian and cyclist entrance ramp to the north of the subject site along Monastery Road which provides access for future residents to the west to Clondalkin and access to the existing pedestrian traffic light crossing which provides access to the east along Monastery Road which comprises footpath and cycle lane to the Red Cow Luas Line. It is noted that one of the main concerns of the Planning Authority was that residents would use the existing access road to the east to walk to the Red Cow Luas Line. The proposed development provides for vehicular access only along the access route. A gate with access for vehicles only is proposed. No access for pedestrians is provided. This ensures that residents exit at the proposed pedestrian access.

The proposed pedestrian and cycle access has been carefully considered in the context of the existing and surrounding environment for walkers and cyclists. The existing use of Dolcain House has been office/employment with people accessing Dolcain House for work purposes only. The nature of accessing the site has predominantly been entering the site in the morning and exiting in the evening with access predominantly by car. The nature of that movement will be amended by the proposed residential scheme with Dolcain House no longer being an employment destination. In this instance access to schools, facilities and services will be a key movement for residents if the scheme. These services are located to the west of the subject lands where the proposed pedestrian and cycle access

will facilitate ease of access to Clondalkin via footpaths to the north and south of Monastery Road. It is also anticipated that the change to residential will require access to public transport such as the Red Cow Luas Line in order to access employment in Dublin City Centre and/or its suburbs.



Figure 1 – Proposed Site Layout Plan Option A – Including footpath

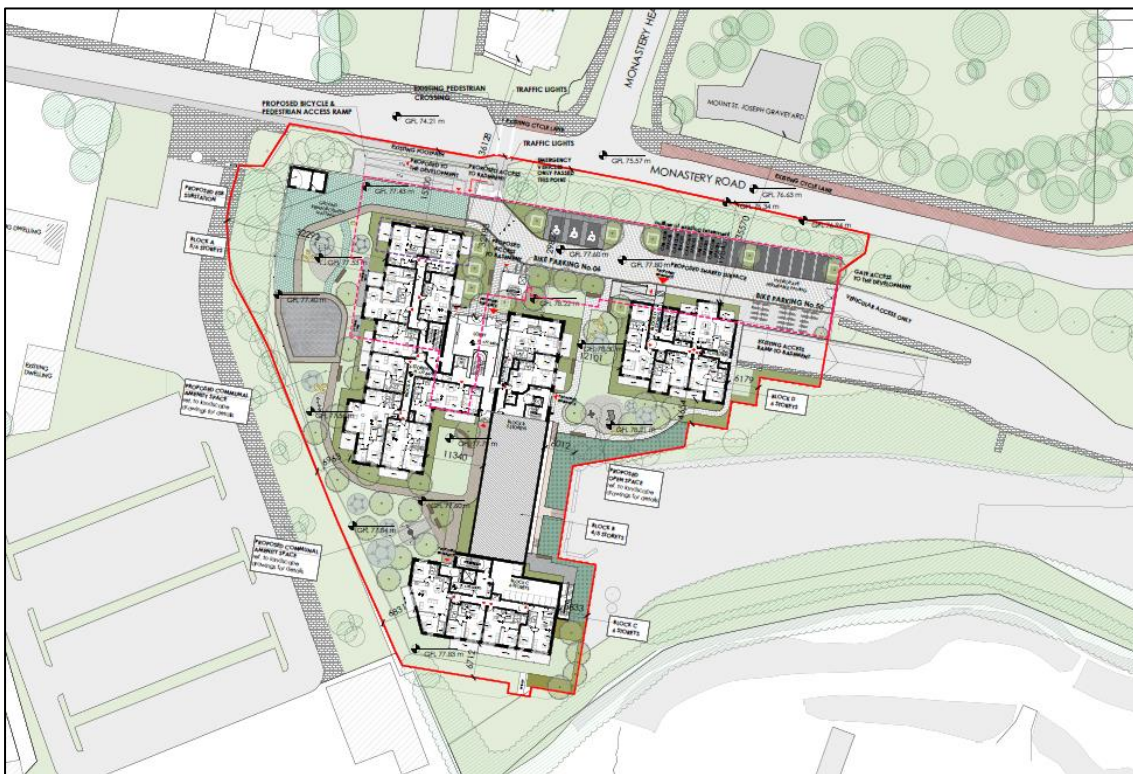


Figure 2 – Proposed Site Layout Plan Option B – no footpath proposed

Following discussions at the Tri-partite meeting, the applicant engaged Dr. Martin Rogers to prepare a pedestrian desire line report to provide further information in relation to existing and proposed desire lines. The aim of the pedestrian desire line survey is to demonstrate that the new pedestrian access proposed at the north of the site provides natural connectivity to these desire lines passing along Monastery Road, permitting pedestrian traffic generated by the proposed development to access the local pedestrian network via a strong desire line constituting the most direct access route connecting facilities that on-foot commuters need to access.

The Pedestrian Desire Lines report is informed by survey county data to verify the desire lines in the areas. Pedestrian surveys were carried out at 4 No locations close to the site of the proposed development on Tuesday 2nd, Wednesday 3rd and Thursday 4th November 2021, between 6AM and 10PM (a 16-hour surveys). The survey demonstrates that the main desire line is located along Monastery Road / Woodford Hill, with a 2-way pedestrian flow reaching approximately 1200 movements per day on Monastery Road directly opposite Dolcain House, reaching approximately 100 movements per day 2-way along Woodford Hill, with a lower 2-way flow of approximately 500/day along Monastery Road east of the roundabout. The survey indicates high incident pedestrian flows along the Monastery Road due to:

- AM and afternoon peak hour flows to / from school; and
- PM flows from work / leisure returning to the residential areas surrounding Dolcain House

The results demonstrate the importance of locating an access point at the northern extremity of site, constituting the most direct route onto the section of Monastery Road with the strongest desire line.

The new pedestrian access proposed at the north of the site will thus provide natural connectivity to these desire lines passing along Monastery Road, permitting pedestrian traffic generated by the proposed development to access the local pedestrian network via the strongest desire line within the local pedestrian network, with this desire line thus constituting the most direct access route connecting facilities that on-foot commuters need to access. In conclusion, the information within the report demonstrates that a strong pedestrian desire line exists along Monastery Road, with the new north ramp for pedestrian traffic giving commuters the most direct access to the external pedestrian network at a point where commuters on foot will most want to enter / exit.

The proposed pedestrian and cycle access has been carefully considered in the context of the existing and surrounding environment for walkers and cyclists. It is considered that those residing in Dolcain House will more likely be travelling to the services available in Clondalkin to the west and to the Red Cow to the east in order to access the Red Cow Luas line. Currently there are no footpaths or cycle lines to the south of Monastery Road to the east of the subject lands. There is a dedicated footpath and cycle lane to the north of Monastery Road with dedicated crossing facilities at the Woodford Hill and Monastery Road roundabout that continues to L1019 and on to the Red Cow Luas Stop. There is currently no footpath or cycle lane to the south of Monastery Road to the east of the subject site along Monastery Road to the Woodford Hill and Monastery Road Roundabout and again east of this roundabout there is no footpath or cycle lane along Monastery Road. The existing walking and cycling facilities are set out in Figure 3 below.



Figure 3 – Pedestrian and Cyclist Desire Line connecting to Public Transport

It was noted that pedestrians and cyclists will take the most direct route available to access services such as the Red Cow Luas line and this would result in pedestrians utilising the existing access road towards the Woodford Hill and Monastery Road Roundabout. However, this would not represent a current route as there is no safe way either walking or cycling to continue along the south of Monastery Road to the Luas Line as there is no existing footpath or cycle lane. Pedestrians/cyclists will have to cross at the roundabout where there are no safe crossings to access the existing footpath to the north. The proposed pedestrian access to the north of the subject site provides natural connectivity to the desire lines along Monastery Road. The design of the proposed development is such that residents are directed to this new pedestrian and cycle ramp to access the signalised pedestrian crossing and safely walk to the Luas Red Cow stop on existing walking and cycling infrastructure. This provides the most direct and indeed safest access to the Luas Line.

Therefore, it is submitted to the Board that the proposed pedestrian and cyclist access to the north of the subject site provides safe and direct access to the destinations and desire lines of future residents. The proposed development has been designed to direct residents to the new pedestrian and cyclist ramp access to the north of the site with pedestrian movement limited via the existing access route. The existing access route is for vehicles only and will be managed with an electric fob access gate.

Following the preparation of this Pedestrian Desire Line report, the Design Team engaged with South Dublin County Council to demonstrate that the proposed new pedestrian and cycle ramp provides access to the pedestrian desire line and provide safe and direct connectivity to existing footpath and cycle facilities to the Red Cow Luas Stop. This was discussed at a meeting with Gordon Poyntz and Justin Halpin (Design Team) and John Joe Hegarty (Roads Department) on 29th November 2021 where the Design Team explained the evolution of the design and the various discussions in relation to the provision of a footpath.

In email correspondence dated 7th December 2021, the Roads Department reverted recommending that a 2.0m wide footpath to the south of the existing trees and hedgeline to the roundabout should be provided. The following was noted in the email correspondence:

“The SDCC Roads Department recommend that the developer at Dolcain House, Monastery Road, Clondalkin, should accommodate a 2.0 meter wide path to accommodate pedestrians and cyclist at the northern boundary along the Monastery Road, recommended path for pedestrians/cyclist route is marked as yellow and shown in the attached drawing for your consideration.”

Just to clarify that the proposed path should run to the south of the trees and hedgeline. The purpose is to preserve the trees. The extent of the proposed footpath is from the proposed pedestrian entrance to the north of your proposed development with ramps for disability access down to the public road footpath on Monastery road. The footpath should be constructed eastwards inside the trees on your land and extending to the boundary line in red. There is a section on third party land in the middle. At the red line is where the SDCC public realm starts. It is SDCC's intention to extend this footpath further eastwards and connect to the existing footpaths on Monastery road to the east of the roundabout. Two Pedestrian crossings to be constructed. One across the SIAC access road and one to cross the Monastery road to the east of the Roundabout to connect to existing paths."

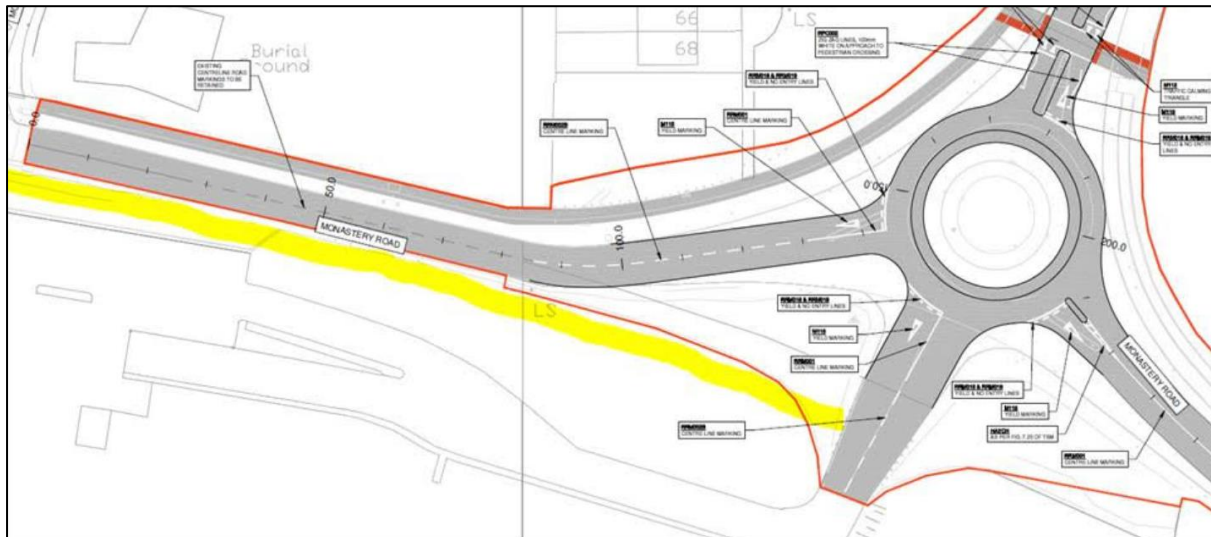


Figure 4 – Location of footpath as requested by South Dublin County Council

The applicant wishes to confirm to the Board and to South Dublin County Council that the applicant would have no issue with providing a footpath to the east of the subject lands if they had the legal right to do so. However, the footpath to the east is predominantly on third party lands that are not in the ownership of the Council or of the applicant and therefore the applicant cannot provide or propose a footpath/cycle lane or any works on lands that they have no control over. It is outside the remit of the applicant to provide the footpath as set out in Figure 4 above. The extent of the third party ownership is outlined in dashed purple figure 5 below.

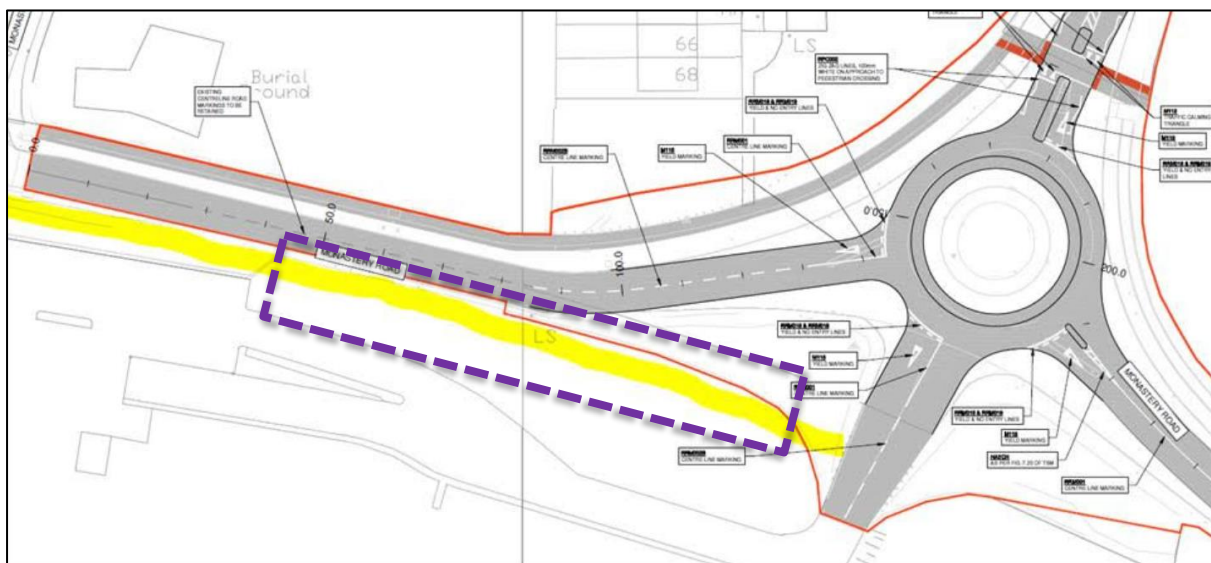


Figure 5 – Location of footpath as requested by South Dublin County Council

Following receipt of this correspondence, a further meeting was arranged between South Dublin County Council and the Design Team on 8th December 2021. The following were in attendance:

- Tracey McGibbon (SDCC Planning Department);
- John Joe Hegarty (SDCC Roads Department);
- Anne McElligott (Planner, Design Team);
- Danielle O Leary (Planner, Design Team);
- Justin Halpin (Architect, Design Team); and,
- Gordon Poyntz (Engineer, Design Team).

It was confirmed at the meeting that the majority of the footpath was contained on third party lands and the applicant did not have consent nor the legal right to propose works on these lands.

It is noted that South Dublin County Council strongly recommended that this footpath be provided. However, the applicant wishes to confirm to the Board that they are precluded from proposing works on lands outside their ownership and legally cannot propose such works.

In light of the discussions with South Dublin County Council, the applicant wishes to propose a footpath that they can legally provide and deliver in order to meet the requirements of the Council as much as they possibly can noting that the request of the Council cannot be provided by the applicant.

Accordingly, the applicant sought to propose a 2m wide footpath on lands within their ownership to the south of Monastery Road (Proposed Site Layout Plan Option A as set out in Figure 1 above). This footpath would also tie in with the footpath as permitted under Reg. Ref. SD10A/0064 which is a current live permission set to expire on 9th November 2022 as illustrated in figure 6 below.



Figure 6 – Extract of Site Layout Plan Reg. Ref. SD10A/0064 illustrating path along Monastery Road

The applicant engaged Bruton Consulting Engineers to prepare a Movement Safety Audit of the proposed options developed by the design team. The audit assessed the following options:

- OPTION 1 - Provide a footpath as far as the side boundary (red boundary line) adjacent to the carriageway.
- OPTION 2 - As with Option 1 above provide a footpath to the site boundary and continue the footpath to the rear of the tree line to the east of the site as far as the roundabout on Monastery Road.

- OPTION 3 - As with Option 1 above provide a footpath to the site boundary and continue the footpath to the front of the tree line to the east of the site as far as the roundabout on Monastery Road.
- OPTION 4 - Do not provide a footpath along the southern side of Monastery Road.

The Audit concluded that if option 1 is provided this footpath will terminate without connectivity to another footpath. This could lead to pedestrians using it, getting to the end and either crossing Monastery Road without controlled or uncontrolled facilities where they would have a higher risk of being struck by a passing vehicle or continuing in the grassed verge where they could slip and fall especially in wet or frosty conditions.

The audit recommended the following in relation to Option 1:

“That there may be future schemes where a footpath is provided all along Monastery Road on the southern side and at that time a footpath as outlined should be provided. It would be premature to provide it without the entire scheme being completed as it will result in a deterioration in safety for pedestrians. It is important that space be reserved for such a future footpath i.e. sufficient area of the site free from landscaping/above ground features etc. that could lead to pinch points or below standard width footpath and possibly cycle track in the future. Another alternative is that the footpath may be constructed and left inaccessible to pedestrians by the use of barriers etc. until such time as the other scheme joins in however if the cross section and type of construction for such a scheme is not determined at this stage it may lead to a lack of consistency in cross-section, colour, segregation of cyclists etc. which may render it redundant and having to be taken up.”

The Audit also noted in relation to Option 2 and 3 that such options would result in a footpath terminating without continuity to existing facilities for pedestrians. That Audit recommended that Option 2 and 3 not be provided. With regards to Option 4, the Audits notes that if a footpath is not provided then pedestrians will use the existing northern facilities and the signalised crossings. The report by Martin Rogers has concluded that the proposed northern access is best placed to meet desire lines. It is recommended that Option 4 be implemented with the caveat that space be reserved for future facilities the cross section and construction of which should be consistent with a larger scheme from the Eastern roundabout on Monastery Road.

In conclusion that Audit recommended that no footpath be provided on the southern side at this time as it would not connect to existing facilities and would increase the risk of pedestrians being struck by general traffic. A reservation should be made however for a future footpath and cycle facilities on the southern side of Monastery Road so that a complete scheme from the Luas Park & Ride overbridge and roundabout to east of the site can be provided.

In light of the findings of the Audit and the request of South Dublin County Council to provide a footpath to the east, the applicant is submitting two options for the consideration of the Board. Option 1 provides for a footpath that the applicant can legally provide and deliver and whilst it is not the preferred option of the Council, the proposed footpath can be delivered and can connect into the adjoining footpath/cycle network when the adjoining lands are redeveloped. As set out above, the proposed footpath ties in with the permitted network on the adjoining lands as permitted under Reg. Ref. SD10A/0664 and provides a public footpath along the public road. However, noting the findings of the Audit which recommends that the footpath not be provided at this time as it does not connect to existing facilities and therefore represents a safety hazard to pedestrians, the applicant wishes to submit Option B which does not provide for a footpath. It is noted that the Audit recommends option B noting that if a footpath is not provided, then pedestrians will use the existing northern facilities and signalised crossing and this is best placed to meet desire lines. The applicant wishes to confirm that should the Board consider option B the most appropriate, then a condition requiring the reservation of the lands for a path to connect to future adjoining facilities would be welcomed.

The Design Team have examined in detailed the existing and future pedestrian and cyclist movements into and around Dolcain House. The design submitted as part of this application provides for dedicated and segregated pedestrian and cyclist connections to the north of the site. This entrance is located immediately adjoining signalised pedestrian crossings that provide safe and direct access to the Red Cow Luas Stop to the east and footpaths to the west to Clondalkin. The pedestrian desire line report

indicates that the segregated pedestrian and cycle access as proposed is the best access to serve desire lines. The design of the scheme is such that pedestrians are directed to the existing footpath facilities with the existing access road for vehicles only with electric fob gates proposed permitting vehicle access only. It is submitted to the Board that the proposed development provides for sufficient and high quality facilities for future residents and that should the adjoining lands be redeveloped and a footpath/cycle lane be provided on the adjoining lands either by a third party or South Dublin County Council, that the proposed development can tie in with such networks to provide a safe environment for pedestrians and cyclists. In the interim, it is submitted that there is sufficient and safe facilities to provide access to the east via existing footpaths and the design of the proposed development is such that pedestrians/cyclists will enter the subject site via the dedicated access.

The proposed development provides for the re-use and revitalisation of existing office buildings to now provide for 130 no. residential units. The regeneration of the site and utilisation of existing buildings will result in a positive contribution to the environment. The proposed development provides for significant improvements to the existing site including a significant reduction in hardstanding with the resultant increase in open space, reduction in car parking spaces from 132 at surface level to now providing only 16 spaces at surface level, the provision of a new pedestrian and cycle ramp to the northern boundary, the provision of a footpath or the reservation of space for a footpath along Monastery Road as well as shared surface within the scheme to give priority to pedestrians and cyclists.

For further information in relation to the proposed development as set out above, please refer to the drawings and documentation prepared HA Design Studio, the Pedestrian Desire Line Report and associated documentation prepared by Martin Rogers Consulting and the Pedestrian Movement Audit prepared by Bruton Consulting Engineers which are submitted as part of this SHD application.

3.0 Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

3.1 Air Quality and Noise Assessment

The applicant engaged AWN Consultants to carry out baseline monitoring and an Air Quality Assessment. A detailed baseline assessment for NO₂, SO₂, benzene, and PM₁₀/PM_{2.5} (particulate matter <10 µm and <2.5µm) was undertaken on the site of the proposed development to ensure the works undertaken at the adjoining site of SIAC BP Construction will not impact on the air quality of the potential residents. Monitoring was conducted for a two-month period, from June 2021 – August 2021.

The report confirms that the existing baseline levels of NO₂, SO₂, Benzene, PM₁₀, and PM_{2.5} are low and are within the applicable ambient air quality standards in the region of Dolcain House, Clondalkin. It can therefore be concluded that operations at the adjoining SIAC BP site are not currently causing a deleterious impact to the local ambient air quality and are unlikely to negatively impact the air quality for potential future residents. Please refer to the enclosed Air Quality Impact Assessment prepared by AWN Consultants for further details.

Dalton Acoustics Ltd., were engaged to prepare a comprehensive Noise Assessment of the proposed development. The results of noise measurement sampling carried out between 8th – 10th January 2020 and 9th – 11th November 2021 confirm that traffic noise is negligible at the nearest elevation of Block C to N7 roadway and M50 motorway, as traffic is not the dominant source at this location. Traffic noise from Monastery Road along with trucks coming and going to the SIAC quarry is prevalent on proposed Block D. Measurements obtained at Block C comply with the favourable levels suggested by South Dublin County Council Noise Action plan 2018 – 2023 as well as various acoustic guidelines and standards such as WHO 2000 and BS 4142: 2014. Block D measurement data indicates that there is no mitigation required for vibration transmission. The daytime level for airborne noise is at the limit of commonly used acoustic guidelines and standards mentioned previously as well as the desired daytime low levels as per South Dublin Co. Co. Noise Action plan 2018 – 2023. However, the levels at night-time are located between the desired low levels and undesired levels 50dB – 55dB Lnight. Standard double-glazed windows, when closed will be capable of providing suitable internal levels within noise sensitive rooms internally within Block D. Please refer to the enclosed Noise Assessment report for further details.

3.2 Material Contravention Statement

The application is accompanied by a Statement of Material Contravention, prepared by Hughes Planning and Development Consultants.

3.3 Provide Landscape drawings clarifying the quantum, functionality, and overall quality of public open space proposed.

The application is accompanied by landscape proposals including a landscape report prepared by Jane McCorkell Landscape Architect. The landscape is structured to provide a diverse range of spaces and uses, that animate the space and create visual interest at the human scale. These spaces can be organized into 2 separate zones, each with a distinctive character; Zones: A and B.

- 'Zone A' Proposed Open Space - characterized by the entrance landscape, natural play elements, seating, and planting.
- 'Zone B' Proposed Communal Amenity Space – characterised by the informal playful landscape, communal seating areas, Specimen tree planting and an area tranquillity.

The landscaping proposals (drawings and report) were submitted to South Dublin County Council following the tri-partite meeting on 25th November 2021. The Parks Department confirmed via email correspondence on 2nd December 2021 that they have no further comment on the landscape proposals apart from replacing low play value items with a slide. This change has been implemented within the landscape proposals submitted with this application. Should it be deemed necessary, a condition requiring that the landscaping and play equipment details are to be agreed with the Planning Authority would be welcomed by the applicant. Please refer to the enclosed Landscape drawings and report for further details.

3.4 Provision of Landscape plan clearly delineating communal and private spaces. Requiring consideration of how design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children and security of access to communal amenity space.

The application is accompanied by landscape proposals including a landscape report prepared by Jane McCorkell Landscape Architect. The provision of open space is set out in Drawing No. PP314-06A prepared by Jane McCorkell Landscape Architects and is as agreed with the Parks Department. The landscape strategy provides for diverse range of spaces, lawn, grass moulding, natural play and several smaller spaces with native tree planting and ground flora. The communal open space has both play for younger and older aged groups, with the emphasis on natural imaginative play through soil moulding, large rocks and boulder. Play equipment pieces have been selected for their quality and universal inclusion. Away from the moulded playful landscape there is a small tranquil garden space with ornamental planting and a lawn area for older residence to enjoy. The landscape design seeks to facilitate the use of the open spaces for both adults and children and will provide for a high-quality scheme for residents. Please refer to the Landscape drawings and report enclosed with this application for further details.

3.5 Daylight, Sunlight and Overshadowing Assessment

The application is accompanied by a Daylight and Sunlight Report, prepared Digital Dimensions. This report includes a sunlight/daylight/overshadowing assessment of the proposed development as well as the potential impact on surrounding properties. The assessment confirms that the proposed development complies with the guidelines for Site Layout Planning for Daylight and Sunlight.

3.6 Materials and Finishes Details

High-quality durable materials will be used throughout this development to provide coherence, distinctiveness, and make a positive contribution to the locality. A selected brick combined with white render and stone are being used throughout the facade in order to blend into the nearby residential neighbourhood. Bronze metal will be adopted for balconies railing and windows. The materials have

been carefully selected to create a distinct character for the proposed redevelopment of the existing buildings and provide for a high quality aesthetic. HA Design Studio have prepared an Architectural Design Statement which sets out the proposed materials and finishes to the scheme. Please refer to pg 26 and to Appendix B of the Design Statement for further details on the proposed materials and finishes.

3.7 Potential Impact on Existing Telecommunications Equipment

The proposed regeneration of the existing buildings from office to residential use will require the minor relocation of the existing telecommunications equipment on site to be further setback. This minor relocation is demonstrated in the enclosed architectural drawings. Such relocation will be minor and will be carried out in accordance with the telecommunications provider.

3.8 Details of refuse storage and collection

The application is accompanied by an Operational Waste Management Plan prepared by Awn Consulting. The OWMP presents a waste strategy that complies with all legal requirements, waste policies and best practice guidelines and demonstrates that the required storage areas have been incorporated into the design of the development. Implementation of this OWMP will ensure a high level of recycling, reuse and recovery at the development. All recyclable materials will be segregated at source to reduce waste contractor costs and ensure maximum diversion of materials from landfill, thus achieving the targets set out in the EMR Waste Management Plan 2015 – 2021. Adherence to this plan will also ensure that waste management at the development is carried out in accordance with the requirements of the SDCC Waste Bye-Laws.

The waste strategy presented in the OWMP will provide sufficient storage capacity for the estimated quantity of segregated waste. The designated area for waste storage will provide sufficient room for the required receptacles in accordance with the details of the strategy. Please refer to the enclosed OWMP for further details.

3.9 Evidence of Part V Compliance

The application is accompanied by details of the proposed Part V proposals including the proposals submitted to the Housing Department of South Dublin County Council on 16th November 2021. A letter confirming Hughes Planning on behalf of the applicant has engaged with South Dublin County Council with regards to Part V was issued on 24th November 2021 and is enclosed with this application. The 10% requirement was subsequently confirmed to the Housing Department on 24th November 2021 with land registry folio details confirming the lands were purchased in August 2019 by Randelswood Holdings Ltd and thus the 10% requirement applies. Please refer to the Part V documentation enclosed with the application for further details.

3.10 Ecology Bat Survey

The application is accompanied by a Bat Assessment, prepared by Altamar Marine & Environmental Consultancy, which assesses the potential impact of the development on bats and bat activity in the area and is informed by an up-to-date survey data. No evidence of bat activity was noted within the buildings. No trees of bat roosting potential are to be felled as part of the proposal. No bats were noted emerging from the buildings on site. No significant negative impacts on roosting animals are expected to result from the proposed redevelopment. Foraging activity within the area may be lost unless lighting is controlled. A post construction assessment of the light spill on site to ensure compliance with bat lighting guidelines will be carried out, carried to ensure conformity with the "Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers".

An Ecological Impact Assessment has also been prepared by Altamar Marine & Environmental Consultancy and is enclosed under separate cover. The report concludes that no significant negative ecological impacts would be likely outside the immediate vicinity of the proposed development site following the implementation of mitigation measures on site. The majority of the western treeline will be retained. Due to the fact that the site is poor in species diversity and no habitats and terrestrial or avian species of conservation importance were found, impacts would be limited, localised and reversible depending on the planting regime. In relation to the bat species foraging on site, a sensitive lighting

regime and additional roosting areas are proposed due to the loss of potential roosting areas on site. Foraging would be expected to continue on site. No significant negative long-term impacts on biodiversity would be expected. No significant environmental impacts are likely in relation to the construction or operation of the proposed development. Please refer to the enclosed report for further details.

3.11 Additional details and/or revised proposals in relation to comments from Transportation Planning at the Planning Authority.

The issues raised in relation to transportation, in Addendum B of Planning Authority Report, are discussed above in Section 2.1.1 and in the Traffic and Transport Assessment Report, Parking and Mobility Management Plan and Pedestrian Desire Lines report prepared by Martin Rogers Consulting Ltd.

3.12 Additional details and/or revised proposals in relation to comments from the Drainage Division at the Planning Authority.

The issues raised by the Drainage Division have been addressed in the revised proposals prepared by Lohan & Donnelly Consulting Engineers. The proposals submitted with the application were subject to further consultation with the Drainage Division of South Dublin County Council via email correspondence in October and November 2021. On 10th November 2021, the Drainage Division confirmed that there were no further requests regarding the proposals. Please refer to the enclosed Engineering Drawings and Engineering services report for further details.

3.13 Provision of Housing Quality Assessment

A Housing Quality Assessment has been prepared by HA Design Studio and is enclosed the planning application documentation.

3.14 Information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018

AWN Consulting were appointed by the applicant to prepare a statement in accordance with the provisions of Regulation 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001 (as amended; hereafter referred to as the "Planning Regulations"), this document provides a 'statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive (Directive 2014/52/EU) have been taken into account'. Please refer to the enclosed report for further details.

4.0 Conclusion

This report sets out how the various issues raised by An Bord Pleanála, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed for proposed Strategic Housing Development at Dolcain House, Monastery Road, Clondalkin, Dublin 22.

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality student accommodation development will be provided.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.



Anne McElligott MIPi
Director
for and on behalf of HPDC Ltd