

Planning Report

Proposed SHD – BUILD TO RENT

**Lands at the former TedCastles site
And DunLeary House (a Proposed
Protected Structure),
Old Dunleary Road,
Cumberland Street,
Dun Leary Hill,
Dun Laoghaire,
Co. Dublin.**

On behalf of

Ted Living Limited

November 2021



Planning & Development Consultants

63 York Road,

Dun Laoghaire,

Co. Dublin

www.brockmcclure.ie

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1 EXECUTIVE SUMMARY

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report on behalf of **Ted Living Limited, Riverside One, Sir John Rogerson's Quay, Dublin 2** for a proposed Strategic Housing Development (SHD) relating to a Build to Rent (BTR) residential development of 146 residential units, associated residential tenant amenity facilities, works to DunLeary House (a Proposed Protected Structure), a retail unit and all associated elements include public realm provisions all at site of c. 0.55 ha, on lands **at the former Ted Castles site and DunLeary House, Old Dunleary Road, Cumberland Street, Dun Leary Hill, Dun Laoghaire, Co. Dublin.**

The subject site represents an opportunity to develop central and accessible underutilised lands in the urban core of Dún Laoghaire with excellent linkage to existing public transportation.

An Bord Pleanála is invited to review the content of the enclosed SHD planning application and accompanying documentation to consider the proposal on its merits and in line with the relevant statutory policy context.

A summary of the main points of this report are set out below:

Ted Living Limited - the Applicant

The applicant (Ted Living Limited) is an Irish property development company specifically set up for the proposed development.

Ted Living Limited is part of the Ardstone Group, which has 20 years experience in the design and development of high quality residential and commercial properties.

The proposed development has been designed based on the Ardstone Group's professional experience and on best practice international examples.

This Build to Rent scheme and all associated elements will create high quality homes, residential amenity facilities and neighbourhood centre uses on an important brownfield site. It will regenerate an existing building in order to create a sense of place and deliver significant public realm improvements.

The Site

The subject site is composed of lands in the ownership of the applicant Ted Living Limited and lands which are the subject of the proposed public realm works within the control of Dun Laoghaire Rathdown County Council.

The applicant has discussed and agreed the proposed public realm works with Dun Laoghaire Rathdown County Council. Dun Laoghaire Rathdown County Council have furnished Ted Living Limited with a letter of consent in relation to public realm proposal lands.

The majority of the site was formerly used as a coal merchants and is referenced herein as the "former Ted Castles site". The site also comprises DunLeary House (a Proposed Protected Structure), the former Tedcastles McCormick office building. It is considered underutilized, in a central/accessible urban location (proximate to the DART and Dublin Bus services) and brownfield in planning terms.

It is bounded by 'Clearwater Cove' a 6/7 storey residential development to the east and a 5/6 storey development at De Vesci Apartments to the west on the opposite side of Cumberland.

The site is c.300m from the Salthill/Monkstown DART Station and c. 900m from Dun Laoghaire DART Station. There are bus stops (namely bus no. 7, 111 and the high frequency 46A) located in close proximity to the subject site. The site is located on the Coastal Mobility Cycle Route.

The Scheme



This is a **Build to Rent** scheme providing a total of 146 residential units and all associated elements, a retail unit (c.290m²) and the regeneration of DunLeary House as historic office suites and significant public realm upgrades to the Old DunLeary Road/Cumberland Street junction.

The Residential Mix is 33 x Studio Units (23.3%), 81 x 1 Bedroom Units (55.4%), 35 x 2 Bedroom Units (23.9%)

Overall height ranging from 6 storeys (with set backs from 4th & 5th storey) addressing Dun Leary Hill, to 5 and 8 storeys (with set backs from 7th storey) addressing Old Dun Leary Road. The heights are considered appropriate to the site and surrounding context and are framed by existing developments thereby providing an appropriate architectural response at this important brownfield site at the entrance to Dun Laoghaire.

Extensive residential amenity facilities are proposed throughout the development including a:

- gym and associated ancillary facilities at level 01G (c.119.79 sqm),
- multi-functional atrium/reception amenity area at level 01G (c.242.2 sqm).
- Residential amenity (sky lounge facility c.96.96 sqm) with external terrace at level 7

Private Open Space for the apartment units is proposed by way of balconies and shared landscaped terraces. Communal open space is provided in the form of a landscaped courtyard (c.481.6 sqm) and landscaped terraces with visibility from public areas

52 no. car parking spaces are provided overall with 44 no. car parking spaces at level 00 and 8 no. on street spaces will be provided on Cumberland Street.

At level 00, 277 no. bicycle spaces are provided for the residential component of the proposed development (in the form of bicycle stands and bicycle storage room) and 4 no. motorcycle spaces are proposed.

Significant Public Realm improvements including the provision of footpath upgrades, a signalised junction on Old Dun Leary Road and Cumberland Street including pedestrian crossings on all arms, landscaping and c.32 no. bicycle parking spaces to the front of the proposed retail unit and on street car parking spaces on Cumberland Street.

The refurbishment, alteration and change of use of an existing building on site known as “Dunleary House” (a Proposed Protected Structure) to provide co-working office suites at ground, 1st and 2nd floor level. The works will include demolition of non original extensions to DunLeary House, removal of existing roof, alterations to internal floor layouts and linking the existing building to the new development from basement to 2nd floor with the construction of 4 floors of development above the existing building.

1.1 The Build to Rent Model

The scheme offers an exemplar Build to Rent (BTR) development of 146 units at a key urban location in Dún Laoghaire. This is a class leading BTR scheme with the focus on delivery of appropriate house sizes to meet changing demographic demands.

The BTR principle applied to the site delivers a viable long-term housing solution beyond traditional home ownership for those seeking an alternative to our current housing model. The BTR model consists of rental properties as opposed to privately owned homes, which is a new and exciting way to meet the housing needs of key sectors of our society including a young and increasingly internationally mobile workforce, as well as older persons who want to live independently.

A key component of successful Build-to-Rent developments is a generous provision of well-considered and high-quality amenity spaces for the benefit, comfort and convenience of the residents. The applicant has visited a large number of existing schemes across both Europe and The United States, and has used this experience to design a best in class offering for the former Ted Castles site. The scheme therefore consists of purpose built rental residential units which are



centrally managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable management of apartment stock.

There is a commitment for the current BTR proposal to remain as a managed accommodation for 15 years, where no individual units can be sold or rented separately for this period of time.

The applicant can confirm that a draft legal covenant to this effect is enclosed as part of this full planning application to An Bord Pleanála.

1.2 Planning Context

The proximity of the site to public transport and local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with the national policy mandate.

The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities, connections to public transport and car and bicycle parking facilities. Careful attention has been given to the protection of the existing levels of amenity afforded to the surrounding properties.

The scheme provides a mix of neighbourhood uses including a new retail unit at a high profile corner and the conversion of DunLeary House into co-working office suites, which will be fully available for use by the general public. The public realm upgrades will enhance the viability of the neighbourhood centre uses proposed and ensure the overall amenity of the area is notably improved by way of this development.

2 THE DESIGN TEAM

Ted Living Limited (the applicant) has appointed an experienced design team to prepare the enclosed material to An Bord Pleanála. The immediate design team comprises the following:

Team Member	Input
Ted Living Ltd	Applicant
MOLA Architecture	Architects
DBFL Consulting Engineers	Engineers
Mitchell McDermott	Project Managers
Cameo & Partners Design Studio	Landscape Architects
David Slattery	Conservation Consultant
Brock McClure Planning & Development	Planning Consultant
Openfield Ecological Services	Project Ecologist
Enviroguide	Consulting Ecologists
Brian Keeley – Irish Wildlife Surveys	Bat Specialist
Joe McConville	Arborist
Archer Heritage Planning	Archaeologist





O'Connor Sutton Cronin	Sunlight & Daylight Energy & Electrical Engineers
AWN Consulting Engineers	Operational Waste Management Plan
Aramark Property	Building Life Cycle Report
Jeremy Gardner	Fire Safety Consultant
OHAC	DAC Consultants
3D Design Bureau	3D Visualisation Consultants
Scollard Doyle Construction Consultants	Quantity Surveyors
ISM	Telecommunications Assessment



3 INTRODUCTION

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Planning Report to accompany this SHD planning application on behalf of **Ted Living Limited, Riverside One, Sir John Rogerson's Quay, Dublin 2 (the applicant)**.

The report is prepared in relation to a Strategic Housing Development (SHD) for a **Build to Rent (BTR)** development of 146 residential units, associated residential tenant amenity, regeneration of DunLeary House, a retail unit and all associated elements include public realm provisions all at site of c. 0.55 ha.

This planning report is intended to specify the rationale behind the subject proposal; to identify compliance with relevant statutory documentation; and to provide a detailed description of the proposal for the benefit of An Bord Pleanála as part of the enclosed SHD Planning Application.

3.1 Context for the making of this Planning Application

This strategic housing development planning application is lodged in accordance with Part 2 Section 4 (1) of the Planning & Development (Housing) and Residential Tenancies Act 2016, which sets out the following requirements:

(1) Subject to subsection (4), during the specified period and notwithstanding anything to the contrary contained in any other provision of the Planning and Development Acts 2000 to 2016—

(a) an application for permission for a strategic housing development shall—

(i) be made to the Board under this section and not to a planning authority, other than an application for permission, the purpose of which is as set out in section 34(3A) of the Act of 2000,

(ii) be so made only where section 6(7)(b) applies or, in the case that a request is made under section 7(1), when the Board has complied with the request pursuant to section 7(2),

(iii) be so made only where the applicant for permission has fulfilled the requirements set out in section 8,

(iv) be in such form and contain such information as is prescribed, and

(v) be accompanied by the appropriate fee,

and

(b) a copy of the application, shall be sent by the applicant to the planning authority or authorities in whose area or areas the proposed strategic housing development would be situated.

This planning application is lodged in compliance with the above requirements and particularly those set out in Section 8 of the Planning & Development (Housing) and Residential Tenancies Act 2016.

3.2 Hard and Digital Copies

- 2 hard copies and 3 digital copies of all material is now submitted for review by An Bord Pleanála.
- 6 hard copies and 1 digital copy of all material has been issued to the Planning Authority of Dun Laoghaire Rathdown County Council in advance of this submission.
- 1 digital copy has been issued to each of the 5 Prescribed Bodies identified by An Bord Pleanála in the formal opinion issued under ABP-305866-19. The prescribed bodies have specifically requested a digital copy only of the SHD planning application.



4

THE SITE

The subject site (c.o.55ha) is in Dún Laoghaire, Co. Dublin within the administrative area of Dún Laoghaire Rathdown County Council.



Figure 1 – Approximate area of Subject Site outlined red (Google Map Image)

The site is composed of lands in the ownership of the applicant Ted Living Limited and lands which are the subject of the proposed public realm works, which are within the control of Dun Laoghaire Rathdown County Council.

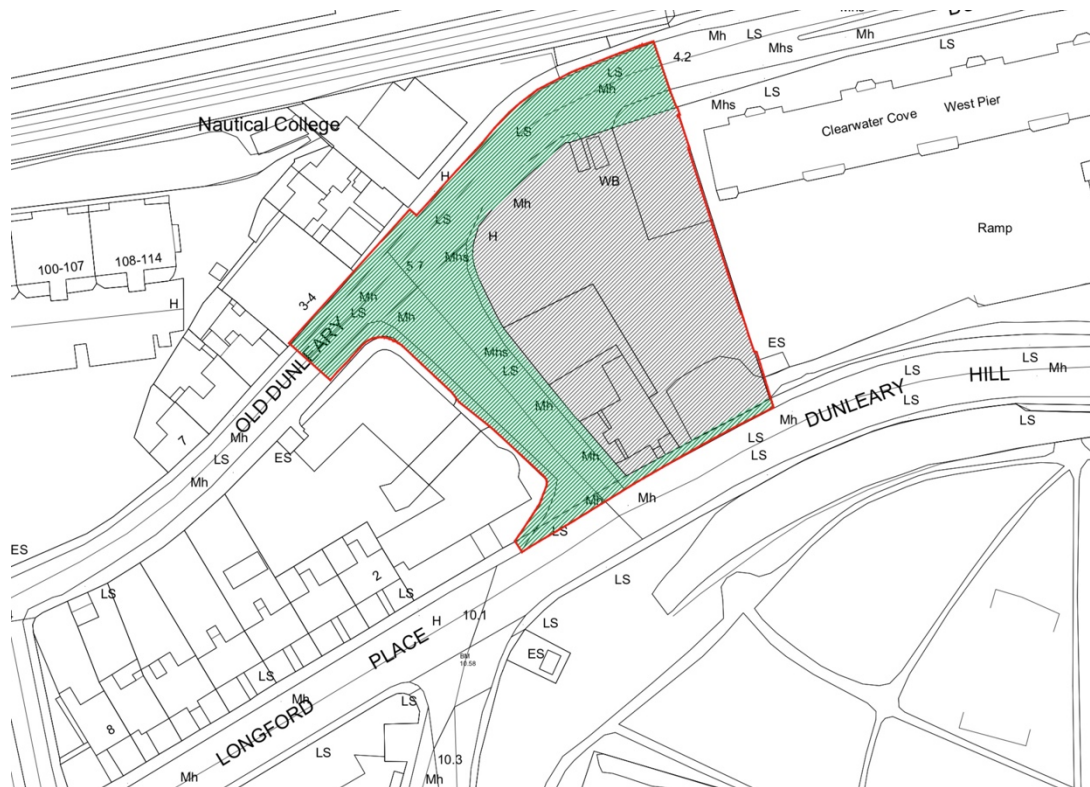


Figure 1 – Application boundary with DLR Lands shown in Green (MOLA Architecture extract)

The applicant has discussed and agreed the proposed public realm works with Dun Laoghaire Rathdown County Council. Dun Laoghaire Rathdown County Council have furnished Ted Living Limited with a letter of consent in relation to public realm proposal lands.

The site was formerly used as a coal merchants and is referenced herein as the “former Ted Castles site”. It is considered underutilized and brownfield in planning terms. The site addresses 3 no. street frontages at Old Dun Leary Road (which addresses the sea/coast), Cumberland Street and Dun Leary Hill and includes 2 no. existing structures/buildings: an open shed structure and a building known as “Dun Leary House”. The site also contains concrete hardstanding/yard area and a small quantum of scrubland.

DunLeary House was constructed c.1880 as a house and offices to serve the industrial site. The building is a two storey over basement structure with a large glazed extension on the north elevation, constructed c.1985. This building has been listed a proposed Protected Structure in the Draft Dún Laoghaire Rathdown County Development Plan 2022-2028. There is also a Specific Local Objective within the current County Development Plan which states ““That Dunleary House (Yellow Brick House) and associated boundary be retained in situ and renovated””.

The site is bounded by ‘Clearwater Cove’ a 6/7 storey residential development to the east and a 5/6 storey development at De Vesci Apartments to the west on the opposite side of Cumberland Street.



Figure 3: Views of subject site (MOLA Architecture)



The site is exceptionally well located in terms of access to existing public transport services including:

DART services – The subject site is c.300m from the Salthill/Monkstown DART Station and c. 900m from Dun Laoghaire DART Station.

Bus - In addition there are bus stops (namely bus no. 7, 111 and high frequency 46A) located proximate to the subject site.

Coastal Mobility Route – The site is located directly on this route.



Figure 4: Location of site proximate to DART and Bus services

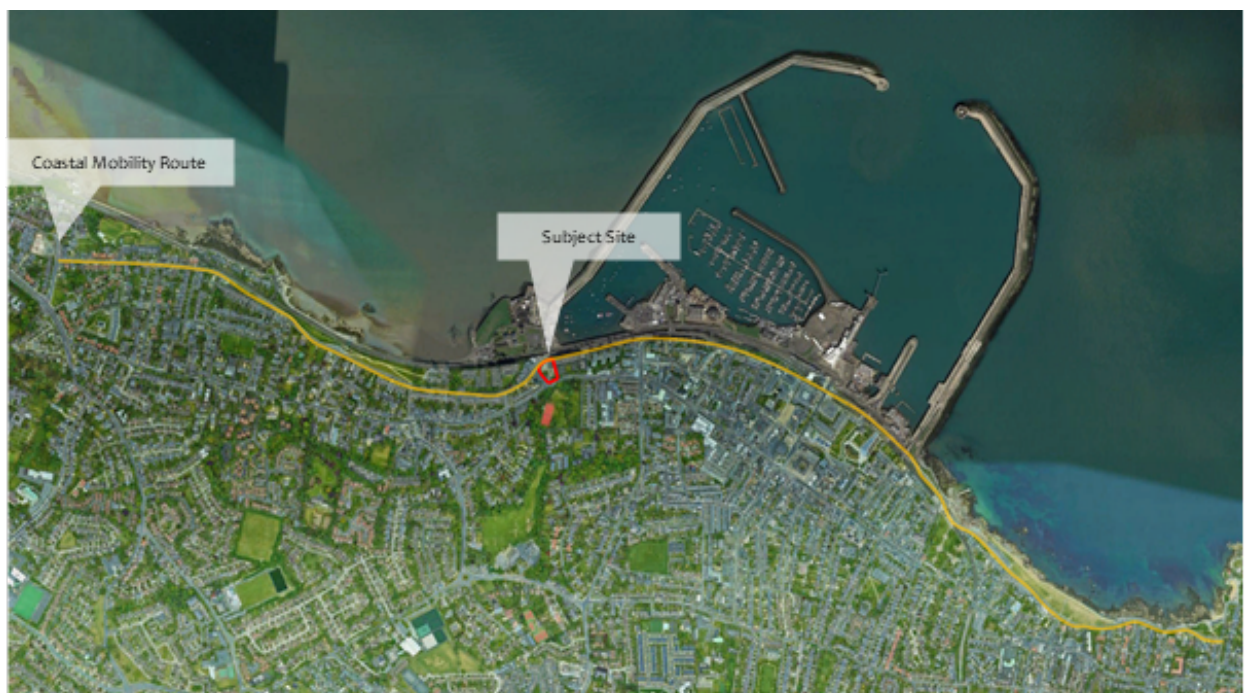


Figure 4: Location of site along Coastal Mobility Route



4.1 Existing Buildings on Site

The existing buildings on subject site comprise the following:

1 no. open shed structure (371.7m²), which is to be demolished as part of this application



Figure 5: Shed Structure to be demolished

A two storey over basement former office building known as Dun Leary House (a Proposed Protected Structure) located on the corner of Cumberland Street and Dun Leary Hill. This building will be incorporated into the development and will provide co-working office suites, as befits its original office use.





Figure 6: DunLeary House



Figure 7: Extension to DunLeary House

As detailed in the submitted material by MOLA Architecture and David Slattery Historic Building Consultants, the non original PVC/Glass atrium pictured above is to be demolished as part of this development.

4.2 Surrounding Context

The subject site is bound to the north west by the Old Dun Leary Road, to the south east by Dun Leary Hill, to the north west by Cumberland Street and the south west by the adjoining residential complex at Clear Water Cove.

Building heights in the vicinity of the site are 6/7 storey at Clearwater Cove to the East and 5/6 storeys at De Vesce Apartments to the west on the opposite side of Cumberland street.



Figure 8: Clearwater Cover – 6/7 storey



Figure 9: West Pier Business Campus – c.20m in height



Figure 10: De Vesci Apartments 5/6 storey



Figure 11: Harbour Square 7/8 Storey

The land use context in the vicinity of the site ranges from residential to commercial including a Service Station, offices, shops and restaurants. The site is centrally located in Dun Laoghaire urban core and is proximate to Monkstown village also.

The existing public realm and junction layout surrounding the site is considered to be of poor quality, for both vehicular traffic and pedestrian use. There is an opportunity to provide tangible improvements to this context by way of the subject proposal with vibrant, active street frontages.

The additional population arising from this development will add activity and vibrancy to this underutilised location and this would assist in supporting the viability of the existing commercial offering within the subject site as well as existing facilities in the wider area.

5 THE BUILD TO RENT (BTR) MODEL AND JUSTIFICATION FOR BTR

The application proposes Build to Rent (BTR) accommodation in the form of 146 apartments, together with associated and ancillary tenant facilities, services as well as a retail unit and co-working office suites.

This section sets out the background to the BTR concept, sets out details of the range of amenities to be provided, demographic trends and a justification for the location of BTR at the subject site.

5.1 The BTR Concept

The applicant and MOLA Architecture have proposed a world class BTR scheme with a focus on delivery of appropriate apartment sizes to meet changing demographic demands.

BTR can be defined as *'Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord.'* BTR units avail of residential support facilities, services and amenities.

The focus of the proposed development is the future occupants, with this in mind MOLA Architecture have included appropriately designed private apartments supplemented by excellent communal space, extensive tenant amenities as well as enlivened street frontages.

The BTR principle applied to the site delivers a viable long-term housing solution beyond traditional home ownership for those seeking an alternative to the current housing model. The BTR model delivered at the former Ted Castles site will provide rental properties as opposed to privately owned homes, which is a new and exciting way to meet the housing needs of specific key sectors of society including a young and increasingly internationally mobile workforce, as well as older persons who want to live independently.

A key component of successful Built-to-Rent developments is a generous provision of well-considered and high-quality amenity spaces for the benefit, comfort and convenience of the residents. The applicant (Ted Living Limited) has visited a large number of existing schemes across both Europe and the United States and has used this experience to design a best in class offering for the proposed development at former Ted Castles site. The scheme therefore consists of purpose built rental residential units which are centrally managed and maintained and include communal spaces, which will contribute to the residential amenity and sustainable management of apartment stock.

There is a commitment for the current BTR proposal to remain as a managed accommodation for 15 years, where no individual units can be sold or rented separately for this period of time. A draft legal covenant to this effect is enclosed as part of the SHD planning application to An Bord Pleanála.

The applicant believes that the scale and type of the proposed amenity is appropriate for and directly linked to the local market and the demand profile of the surrounding area.

Current statistics have confirmed that the average household size in Dublin is steadily decreasing. In 2016, the average household size in Dublin (city and suburbs) was 2.73 persons per household. This is down from 2.99 in 1996 and 3.94 in 1971. The proportion of 1 and 2 person households within the Dublin suburban area is also increasing, up from 42.8% in 1996 to 50.8% in 2016 ^a

The pattern of falling household sizes is set to continue and this is something that must be addressed by the introduction of new housing models. The proportion of adults living alone has also increased between 1996 and 2016 and population of Dublin is further set to expand with a population of 1.60 million expected by 2029.

When this empirical evidence is considered, the rationale for the delivery of BTR development comes to the fore. BTR development is a critical solution to addressing falling household sizes, demographic change and an increasing population. It is not intended to replace the traditional

^a "Demographic Drivers & Changing Housing Demands in Dublin over the coming decade", KPMG Future Analytics, July 2021

house ownership model, but provides an attractive option to a certain cohort of the population. The subject BTR proposal is an exceptionally well considered scheme, the applicant and MOLA Architecture have based the proposed development on the models of international best practice, with ready access to excellent residential amenities such as gyms, Sky Lounge, reception area and immediate access to frequent public transport services at the 2 no. nearby DART stations. The proposed conversion of DunLeary House to co-working office suites will provide an attractive workspace option for future residents in addition to the general public.

5.2 Build to Rent: Design Considerations for the Former Ted Castles Site

For the Resident

The proposed development has been designed as a ‘best-in-class’ Build to Rent development by the applicant, with a focus on retaining residents over the long-term. This includes a number of key elements such as:

- Durable spaces that ‘age’ as well as possible.
- Flexible spaces that can evolve and adapt to changes in living preferences and a changing target market. This is particularly the case with amenity spaces, which can be repurposed if unused in their existing form.
- Provision for staff welfare areas, promoting good quality management that creates a strong reputation over the long-term.
- Creating a strong sense of community. As well as creating a place where people enjoy living, residents are also more likely to stay and renew their leases if they know other residents.
- Creating a ‘churn’ of residents within the development. This is a common concept in mature Build to Rent markets, such as the US, where the aim is to retain residents at all of their life stages – so a single person might move into a larger unit if they become a couple (or vice versa, if they ‘decouple’).

For the Operator

The proposed development has been designed in order to minimise maintenance and management costs in the future, while still delivering an aspirational product for the target market. This incorporates an emphasis on:

- Durability of product, with little hands-on / staff related maintenance required, where possible.
- Easy access; maintenance and landscaped areas have been designed to be easily accessible for the operations team and cause as little disruption to the residents as possible. There will also be landlord/operator stores located throughout the scheme to store spare taps, door handles etc. and other items which might need replacing in the apartments from time to time. This will allow replacement to happen quickly and easily.



Figure 12: Amenity Space

Proposed Amenities

The amenity offering is one of the most significant considerations when designing a scheme specifically for BTR, as it helps to differentiate the offering from other nearby schemes.

The proposed design for The Ted includes a number of well-considered and high-quality amenity spaces for the benefit, comfort and convenience of the residents. The applicant has visited a large number of existing schemes across both Europe and The United States and has used this experience to design a thoughtful amenity provision, that is appropriate for the local market.

These amenity spaces are designed with the requirements of a range of demographics in mind, and are based on a wealth of research in order to successfully address the needs of future residents including:

1. Health & Wellness
2. Convenient Lifestyle (i.e. the ability to work from home)
3. A sense of Community
4. Residential Support facilities (such as laundry facilities, maintenance etc.)

The Proposed Atrium

The Atrium is a unique feature of the proposal development and will provide an impressive entrance for the scheme.

It will serve a number of purposes; a meeting place for residents, an opportunity for passive surveillance for an enhanced sense of security, and an informal central hub where letting activity and key estate management services will be based.

The warm and welcoming design of The Atrium will reinforce the overall quality of the development. It will be well-lit as a result of the generous rooflight above, and serve as a pleasant place for residents to enjoy.

It is envisaged that the community manager will have a presence in the atrium for day-to-day resident interactions and to welcome prospective residents. This is to maximise the efficiency of the use of space, but the manager will also have easy access to a private management/letting office where sensitive matters can be discussed and documentation stored in a secure way. The private office will also house key technical systems such as CCTV and key-fob control.

The Atrium will house the parcel storage system in order to encourage residents frequent use of the area. This will help to create a sense of community. The parcel storage system will be modular in nature so that it is futureproofed and scalable.



Figure 13: The Eddy Building, Boston



Figure 14: Sample quality amenities

The proposed Gym/Wellness Studio

Health and wellness is of huge importance to the target demographic market for the proposed Build to Rent scheme at the subject site and the presence of an on-site gym supports this.

The location of the gym and wellness area has been carefully selected, such that it is easily accessible and convenient for all residents in the scheme. It is located at the base of the scheme in order to ensure minimum noise pollution for the residential units, while still



benefitting from natural daylight provision. It also ensures that residents can avail of privacy while using the facility.



Figure 15: sample gym space

The proposed Sky Lounge

The Sky Lounge has been designed with flexibility in mind as a multi-purpose space for residents.

It will have kitchen facilities so that it is suitable for use as a shared gathering space e.g. for parties or other community group activities. This can be on a rental basis for the residents in the scheme or for group activities organised by the on-site team, open to all residents.

When not in use for a specific function, the Sky Lounge can be used by residents as an extension of their private living space, either to meet, chat with friends and other residents, or as informal 'work from home' space, a trend which is increasingly growing in popularity.



Figure 16: Sample Communal Space



The proposed Apartment Layouts

The proposed apartments have been designed with the health and wellbeing of the user in mind. The unit layouts have been devised with respect to equality with the provision of equal sized bedrooms. The design team considered the quality of the shared living spaces and the importance of natural daylight by providing large glazed windows. In addition, all units will comply with the accessibility requirements as included in the building regulations and the scheme is designed to incorporate passive surveillance of communal areas.

Other Aspects of the Proposed Build to Rent Scheme

Fob Access

Fob access to the main entrance, shared spaces such as the gym and sky lounge, and apartment units themselves will be provided at The Ted. This provides benefits to both the residents and the operator alike. From a resident point of view, it provides a sense of security. From an operational point of view, the fob access system will replace the need to keep a duplicate set of keys for every unit on site thereby reducing space requirements and security risk, and will allow access to be personalised for each user in relation to certain floors, lifts etc. The on-site team will be able to monitor usage of the different amenity features, to learn what is being used and when, and to adapt the amenity spaces to changing demand.

Owner / Operator Information

The management of the property will ultimately be the responsibility of the operator of this Build-to-Rent scheme. Consideration has been given to ensure that a comprehensive operations database will be compiled so that the on-site team has a clear understanding of the property. This database will typically include details of the property such as information in relation to connections with utilities and communication providers, contact details for all relevant suppliers and instructions for the use of any appliances and devices in the property.

Resident Induction

Resident packs prepared by the on-site team will be provided and will include information on day-to-day and emergency contact details, transport links and a clear set of rules and regulations for residents of the property. This will ensure residents are appropriately informed, so any issues can be addressed in a timely / efficient manner and ensure the successful operation of this Build-to-Rent scheme.

5.3 Key Demographics

This section has set out key demographic drivers and changing housing demands in Dublin, which are forecast for the coming decade. The following points are notable from the KPMG Future Analytics Report entitled '*Demographic Drives and Changing Housing Demands in Dublin Over the Coming Decade*' (July 2021)

- Dublin's population continues to expand robustly. In the ten years to 2016, it grew by 13.5% to 1.35 million.
- There also been a shift in household occupancy and composition within existing and new households. The primary driver of this shift is lower fertility rates. The fertility rate in Ireland and Dublin has dropped significantly over the past 50 years, with the replacement rate now below the rate of two children per woman. This reduction in fertility has decreased the average size of families and as a consequence, the demand for larger unit sizes.

- The average household size in Dublin was 2.73 persons per household in 2016. This is down from 2.99 in 1996 and 3.94 in 1971.
- Occupancy within the housing market also shifted significantly in the last number of years, evidenced by the relative growth of the private rental sector. The lack of housing supply, limited availability of finance for purchases, fall in property prices and increase in the unemployment rate all combined to see a transition away from the well-established owner-occupier market. The private rental sector has grown; increasing from 14.5% of households in 2002 to account for 23.9% of households in 2016. Its absolute growth has been from nearly 55,000 to over 114,000; growth of 109% between 2002 and 2016. Consequently, there is now a greater level of competition amongst those households choosing, or being forced to choose, privately rented housing.
- The proportion of adults living alone in Dublin has increased to 23.9% between 1996 and 2016.
- Dublin's population is set to continue expanding due to natural growth and net inward migration. Looking forward, year-on-year rates of growth are expected to pick up and the population is projected to reach 1.50 million by 2024 and 1.60 million by 2029.
- Looking ahead to 2029, the minimum cumulative housing requirement will increase by a further 45,159. The pattern of falling household size requirements will persist and the majority of this demand will be for 1-and 2-person households which will account for 31,816 or 70.5% of preferences. The annual requirement for completed units will be on average around 11,035 per year to meet the minimum requirements of Dublin's population over the coming decade.
- It is critically important that the construction of new housing reflects the altered demographics and housing supply must shift from traditional 2 storey houses to apartment units that meet demand.

It is evident from the above statistics that the average household size in Dublin is steadily decreasing. The pattern of falling households sizes is also set to continue and this is something that must be addressed by the introduction of new housing models. The proportion of adults living alone has also increased between 1996 and 2016 and population of Dublin is further set to expand with a population of 1.60 million expected by 2029.

It is in consideration of the above statistics that the delivery of BTR development comes to the fore. BTR development is a critical solution to addressing falling household sizes and an increasing population.

The subject BTR proposal is a high quality design with ready access to residential tenant amenities such a gym, sky lounge facilities and multifunctional reception area and also has good quality access to public transport in the form of DART and Dublin bus services. Furthermore, the model proposed is well placed in the market in terms of ability to get to work; access to public transport and will be affordable. These are fundamental requirements for the success of the BTR model. The quality of the development delivered is exceptional, meeting standard apartment requirements with the benefit of first class residential tenant amenities.

Demographic analysis for the Dublin area robustly supports the provision of Build to Rent development and it is in considering the trends set out above that the current concept should be positively considered.

5.4 BTR Housing and Planning Policy

Recent Planning policy has changed the perspective of how planning and housing delivery must respond to demand. The provision of BTR developments is a key focus of the current national policy mandate. This section sets out the key BTR planning policy provisions which the proposed development responds too.

The National Planning Framework (NPF)

The NPF estimates a need to house one million new people by 2040, focusing development on the top 5 cities, some 50% of that development within Dublin. This new development is to be targeted at brownfield and infill sites in the first instance. Sustainable and accessible sites near transport and employment have priority, and new mechanisms such as BTR apartments are a means of achieving this densification.

With regard to rental accommodation, the NPF sets (page 93) out the following key provision:

*“To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to **build inwards and upwards**, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.*

*This is underpinned by on-going population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a **higher proportion of households in the rented sector**”.*

A key benefit of BTR is the potential to accelerate the delivery of new residential units at a significantly greater scale than at present. This potential can make a significant contribution to the required increase in housing supply nationally, envisaged by the National Planning Framework.

The proposal for 146 build to rent residential units at the former Ted Castles site delivers on the vision set out by the National Planning Framework. The new residential population will have an exceptional level of on-site tenant amenities, in addition to easy access to the services and facilities located at Dun Laoghaire and Monkstown.

Rebuilding Ireland

Pillar 4 of the Rebuilding Ireland initiative focuses on the delivery of rental units in Ireland.

The overall vision of Pillar 4 is as follows:

*“Government housing policy aims to ensure that, to the greatest extent possible, every household can access secure, good quality and affordable housing suited to its needs and located within sustainable communities. Within that, our vision is for a strong, **viable and attractive rental sector** supported by a policy and regulatory framework that delivers long term affordable and high quality accommodation solutions meet diverse tenant needs, and a secure, predictable investment environment for landlords and accommodation providers (page 7).”*

*“A very significant proportion of the Rebuilding Ireland target of **delivering 25,000 units of housing supply per annum will need to be provided for in the rental sector**. The traditional dominance of the build to sell model must evolve to provide for increased delivery of housing intended specifically for rental purposes. Our perception of the sector as a short – term tenure option must also evolve. (page 7)”*

The delivery of 146 build to rent residential units, goes some way in addressing the demand for 25,000 rental units. There are limited brownfield zoned sites in the Dun Laoghaire Rathdown administrative area that can accommodate development of the scale proposed in this case. It is critically important that this key site is redeveloped to maximise the efficiency of the former Ted Castles site and contribute positively to housing supply and the creation of a vibrant streetscape at this location.

The Apartment Guidelines

The Department of Housing, Planning and Local Government, published the Apartment Guidelines ‘Sustainable Urban Housing: Design Standards for New Apartments’ in 2018 (updated in 2020) which brought the concept of Build to Rent Accommodation to the forefront in Ireland.

As set out in the enclosed separate *Statement of Consistency*, the Apartment Guidelines (2021) identify a number of key components for BTR developments. The specific BTR requirements and a detailed compliance response is set out in the enclosed *Statement of Consistency* for the benefit of An Bord Pleanála.

The Dún Laoghaire-Rathdown Development Plan 2016-2022

The Dún Laoghaire-Rathdown Development Plan 2016-2022 recognises that a wider mix of housing and apartment types are required within its functional area with Policy RES7 (*‘Overall Housing Mix’*) stating:

“The provision of a range of housing types and sizes in the County will increase in importance as trends show a decline in family housing and an increase in elderly and single person households. Many of the new households that will form in the County during the period of this Development Plan will be below the current average size and will often consist of one or two persons.”

Due to the acute housing shortage prevailing and the significant demand that exists in the Dún Laoghaire area, the site has been identified as an eminently suitable location for a ‘Build-to-Rent’ scheme which can provide purpose-built accommodation to meet the housing needs of a greater number of persons on a suitably zoned, brownfield urban site proximate to high frequency public transportation.

Policy Summary

Overall, the national policy mandate message is clear, a fully functioning rental market and one that is fit for purposes is a fundamental requirement in addressing current difficulties experienced in the Irish rental market.

The proposed development at the former Ted Castles site will make an important contribution in bridging the gap in the 25,000 new rental units envisioned for delivery nationally and will provide for a viable and alternative option to the private rental sector.

Furthermore, and as set out in the enclosed *Statement of Consistency* prepared by Brock Mc Clure Planning and Development Consultants, recent shifts in planning policy are lending significant weight to higher residential densities and taller buildings at appropriate locations. The opportunity to deliver these requirements at appropriate locations particularly on underutilised/infill/brownfield lands within Dublin city and suburbs in close proximity to public transport services are rare and must be expedited.

The BTR model is considered to be exceptionally well equipped in delivering these requirements and the subject site is considered highly suitable in terms of its zoning, location, and proximity to excellent public transport services is ideal for the delivery of this type of accommodation.

The proposed development is considered an exceptional opportunity to deliver on national policy requirements and the potential associated with the subject site; its location; and its ability to deliver a quality build to rent model must be recognised and full supported.

5.5 Suitability of the Site for BTR Development

The following section sets out a number of key points in support of the principle of BTR development at the subject site based on (a) site location and access public transport accessibility and (b) the proximity of the site to local employment centres.

Site Location and Access to Public Transport

The subject site is exceptional well served by public transport. The site is:

- c.300m from the nearest DART station at Salthill/Monkstown DART Station
- c. 900m from Dun Laoghaire DART Station.



- Proximate to Dublin Bus stops for the following routes:
 - No. 7 from Mountjoy Square to Brides Glen Luas Stop
 - No. 46A from Phoenix Park to Dun Laoghaire (High Frequency)
 - No. 111 from Dalkey to Brides Glen (via Dun Laoghaire)

Dublin City Centre can be accessed from the subject site with a journey time between c. 20 – 25 minutes by public transport.

Bray is c. 20 minutes via public transport are equally accessible by bus with journey times of approximately 25 minutes.

Aside from public transport facilities, the DBFL Traffic and Transport Report submitted as part of this SHD planning application to An Bord Pleanála confirms that traffic generated from the site will not cause excessive delays or queuing nor will junction capacity issues arise as a result of the proposals. Analysis shows that all junctions operate within capacity for the Horizon design year of 2037 within the local traffic network.

The site is also located directly on the Coastal Mobility Cycle Route which provides safe accessibility for cyclists along the coast between Blackrock and Dún Laoghaire.

Local Employment Centres

The former Ted Castles site is located in close proximity to the following key employers:

- The site is considered a central urban location in Dun Laoghaire proximate to the high frequency DART/rail services from Salthill Monkstown DART stations and Dun Laoghaire Rathdown DART station which will provides rapid transit to **City Centre Employment Centres** including the Dublin Docklands which can be access via the Grand Canal Stop.
- The subject site is located in close proximity to the **West Pier Business Campus** comprising c. 11,000sqm of office accommodation. West Pier Business Campus includes a number of key international employers including Lionbridge, RPS Consulting Engineers, Indaver Ireland HQ etc. This is within 5 minute walking distance of the subject site.
- The subject site is within close proximity to the extensive range of services and employers in **Dun Laoghaire** (including offices, hospitals, schools), **Monkstown** and **Blackrock**.
- The **National Rehabilitation Hospital** is located less than 3.5km to west of the former Ted Castles site. The hospital employs a significant number of healthcare professionals and administrative staff, which is proximate to the subject site and accessible via public transport.
- **The Dun Laoghaire Institute of Art, Design and Technology** is located c. 3.0km from the subject site. This institute is the only one of its kind in Ireland with a specific focus on the creative, cultural and technological sectors. The institute is currently home to c.2000 students.

Having considered the above, it is our professional opinion that the subject site's location in terms of accessibility to existing transport nodes and local and city centre employment areas makes it an ideal candidate for the BTR development model.

The delivery of a BTR proposal at this location is supported on the basis of the locational advantage of the site including its position relative to major employment centres in the surrounding area and the accessibility of the site to 2 no. DART stations at Salthill/Monkstown and Dun Laoghaire, which serves the city centre and beyond.

We trust that due consideration will be given to the suitability of the current site for BTR development and that the unique opportunity associated with the site for this form of development will be recognised.

6 PLANNING HISTORY

A brief synopsis of the planning history pertaining to the subject site and surrounding area is set out herein. There are a number of planning applications relating to the former Ted Castles site.

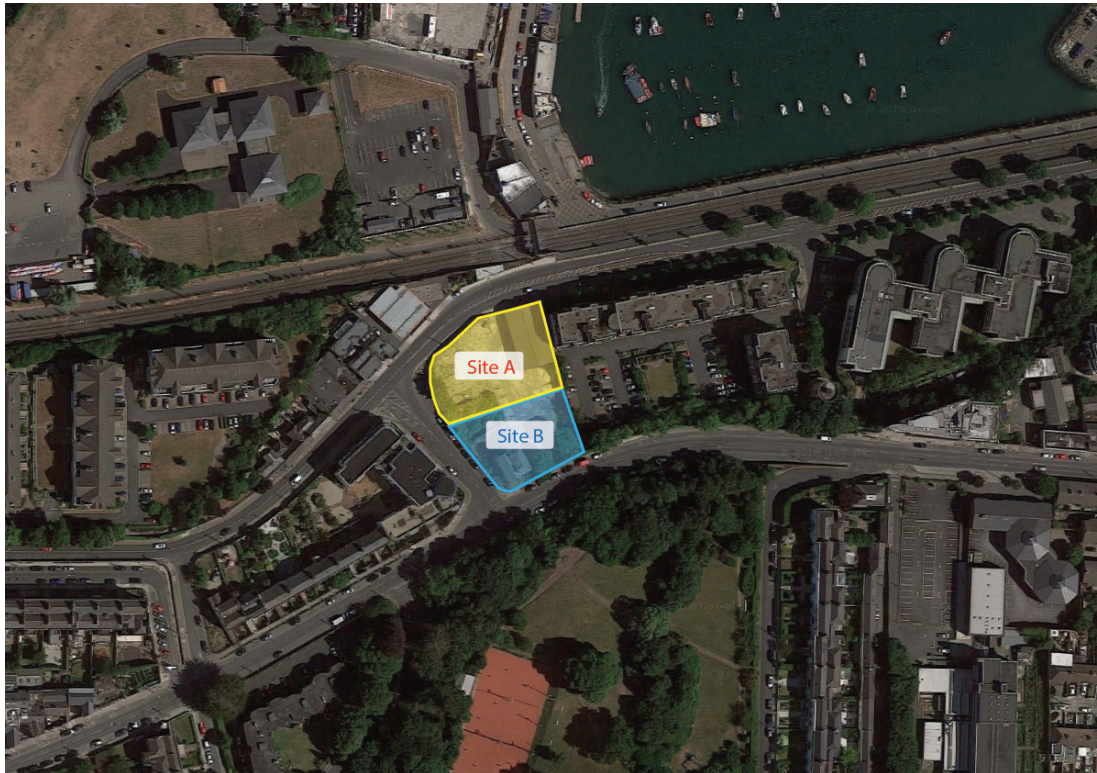


Figure 17 – Planning History of subject site (identified as Site A and Site B above)

6.1 Planning History

Site A:

Dun Laoghaire Rathdown County Council Planning Reg. Ref. D03A/0292

Permission was granted in 2003, for the demolition of the existing building on site and the construction of a 7 storey residential block comprising of 3 3-bed apartments, 52 2-bed apartments, 12 1-bed apartments with a coffee shop at ground level and a basement car park with 93 car parking spaces and a landscaped terrace. This was appealed in 2004 but permission was subsequently granted following conditions to reduce the height of the building by omitting the first floor. This omission brought the total number of permitted apartments to 55.

Dun Laoghaire Rathdown County Council Planning Reg. Ref. D06A/0312

In 2006 permission was granted for alterations to approved permission D03A/0292. This comprised of an additional 4 apartments, bringing the number up to 59, from the 55 approved and the 67 previously applied for. This involved a reconfiguration of the existing planning permission.

Site B:

Dun Laoghaire Rathdown County Council Planning Reg. Ref. D03A/0291 (An Bord Pleanála Ref. PL06D.204798)

Permission was granted in 2003, for the demolition of the existing building on site and the construction of a mixed-use development. This site includes the existing “DunLeary House”. The

development comprised of 2 retail units, offices, a gym/ health centre and a basement car park for 28 car parking spaces. The development (4 storeys in height) included a landscaped garden terrace and vehicular access to the adjoining site. The decision to grant was appealed in 2004, permission was subsequently granted with conditions to reduce the height of the building by omitting the second floor.

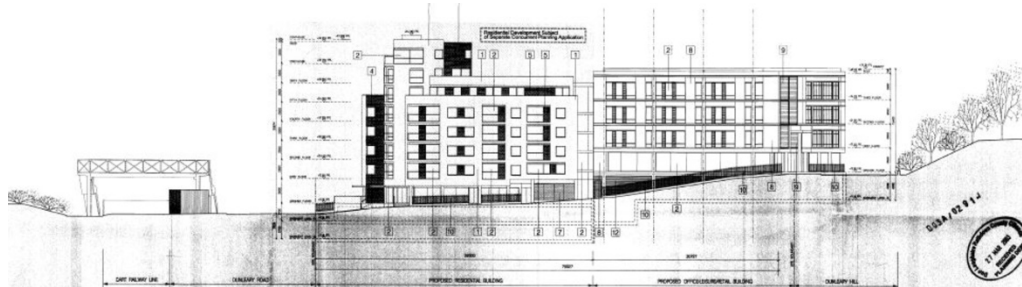


Figure 18: Previously Permitted Development

The permissions listed above have not been implemented on subject site and have since expired.

Applicant's Comment on Planning History:

- It is noted that Dun Leary House was permitted to be demolished in 2003 by An Bord Pleanála (under Planning Reg. Ref. D03A/0291- An Bord Pleanála Ref. PL06D.204798).
- Planning policy context for the subject site has altered significantly since those permissions were assessed and granted over 15 years ago. In particular the policies and associated with building height, delivery of housing and design have significantly evolved.
- The publication of the 'Building Height Guidelines' and 'The Apartment Guidelines' now frame the context for building height and apartment design. The applicant has ensured that the subject scheme represents an exemplar project addressing the requirements and clear mandate of the new Guidelines.

6.2 Surrounding Area

The site is immediately bounded by 6/7 storey and 5/6 storey residential developments. The surrounding context of Dún Laoghaire Town Centre includes some notable new developments either permitted or under construction. These developments reflect the policy direction to increase density at appropriate locations and promote town centre living.

6.2.1 Old Schoolhouse on Eblana Avenue Dun Laoghaire ABP 304249

Permission was granted for a Strategic Housing Development at the former Schoolhouse on Eblana Avenue located east of the subject site. The development comprises construction of a 4/6 storey Build- to-Rent Shared Living Residential Development comprising 208 No. single occupancy bed spaces and associated ancillary amenities. An Bord Pleanála granted permission on 26/07/2019 and construction is underway on site.



Figure 19: Southern Elevation of permitted development



Figure 20: Northwest Elevation of permitted development

6.2.2 Former St Michael's Car Park, Crofton Road ABP 309098-21

Permission was granted for a Strategic Housing Development on lands at Crofton Road, opposite Dún Laoghaire DART Station for the construction of 102 no. build to rent apartments across two buildings rising from 5 no. storeys to 13 no. storeys.



Figure 21: CGI of permitted development on Crofton Road

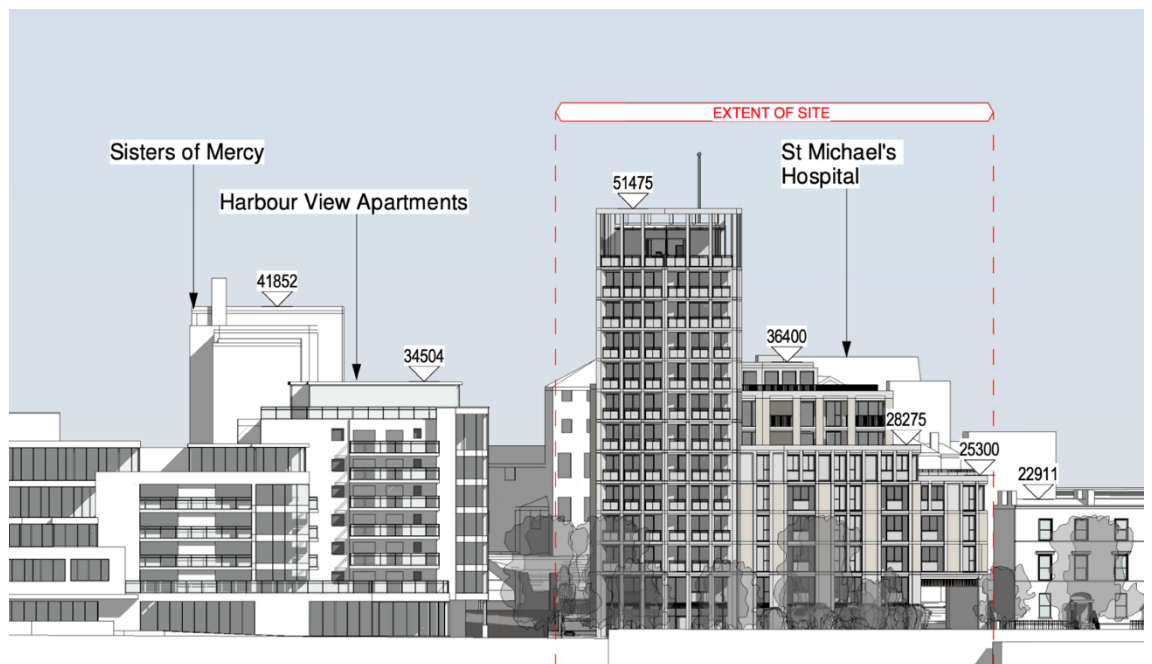


Figure 22: Northern Elevation of permitted development



6.3 Statutory Notice Check

Section 17 of the SHD Planning Application Form sets out a requirement to consider the following vis a vis the subject site:

Do any statutory notices (e.g. Fire Safety, Enforcement, Dangerous Buildings, Derelict Sites, Building Control etc.) apply to the site and/or any building thereon?

We note that there are no notices of immediate relevance to the subject site.

Fire Safety Certificate

No records on site.

Enforcement

No records on site.

Dangerous Buildings

No records on site.

Derelict Site

No records on site.

Building Control

No records on site.

Vacant Sites

The subject site is not included in the Vacant Sites register. It was removed from the Vacant Sites register by An Bord Pleanála Order dated 7th January 2019 (An Bord Pleanála Order relating to **ABP - 30211-18**).

7 SECTION 247 - PRE-PLANNING

Details on the Pre-Planning Meetings held are set out in brief below.

7.1 Pre-Planning Meeting

A pre-planning submission was lodged to the Planning Authority on 24 July 2019, with a follow up submission on 19 August 2019. A formal pre-planning meeting was subsequently on 19 August 2019. We have grouped the key points raised by DLRCC at this meeting by theme follows:

Architecture & Planning

- Concerns in terms of height, mass and scale, how building sits in the streetscape and overall composition of the building
- Noted the specific Site Objective relating to DunLeary House
- Proposals must meet amenity ratios as per the Apartment Guidelines.
- Confirmed that the proposal is along the right track in terms of Neighbourhood centre
- Suggested additional residential amenity will have to be clearly highlighted for the units that do not have balconies



- Overshadowing & Daylight on neighbouring building and internal courtyard will need to be assessed
- Verified view locations were discussed
- Part V was discussed
- Advised the elevations need to be broken down and the building needs to be lower in height

Lighting Proposals

- The existing light on Dun Laoghaire Hill not to be moved if possible
- Increased public lighting at Cumberland Street
- The proposed courtyard to be lit continuously but not over lit and can be dimmed at night

Transportation

- A Traffic impact assessment, Travel Plan and Construction Management Plan required
- The proposed scheme must comply with DMURS
- The proposed parking appears
- Motorbike parking be included
- Electric charging points be included
- A Letter of consent to be requested for works outside the site boundary

Parks & Landscape

- A Tree survey be prepared
- Plant selection is important due to local weather and wind.
- Overshadowing to be carried out for external terraces and internal courtyard.
- Ecology survey required
- Maintenance of landscape to be considered
- Bat survey required

Drainage Division

- Requested evidence that applicant can divert the sewer and requires sections to show this.
- Flooding – a site-specific Flood Risk Assessment is required
- Surface water diversion works had been carried out but advised there is still issues on the site.
- Applicant need to have consultation on the diversions
- Green roof – DLRCC noted that applicant cannot include podium area on top of basement in calculations. Green Roof needs to be on a building roof.

Waste Department

- Discussed Site Investigations and level of any contamination – applicant to provide details – to be included with the planning application
- Construction Management Plan to be included in the planning application
- Acoustic details will be required as part of the application – in relation to the position of the gym's proximity to apartments

Following this 247 Meeting, the design team produced various iterations of scheme development for review and comment by the Planning Authority. It is worth noting that draft proposals at this stage included the full demolition of DunLeary House, which is now to be retained and incorporated into the development.



8 STRATEGIC HOUSING DEVELOPMENT – PRE PLANNING REQUEST

On 8 November 2019, a formal Strategic Housing Development pre-planning request was lodged with An Bord Pleanála. Reg. Ref. ABP- 305866-19 refers.

The pre-application development consisted of 161 no. residential apartment units and demolition of DunLeary House. A comprehensive pre-application request was lodged with An Bord Pleanála setting out the basis on which the pre-application request could be favourably considered.

The key changes between the pre-application and current application stages largely relate to amendments to the no. of units, heights and massing, retention of DunLeary House and boundary and landscaping. These amendments were brought forward as part of the evolution of the design and the formal response required by An Bord Pleanála in relation to a number of items.

8.1 Planning Authority Opinion

As part of this pre-application process, Dun Laoghaire Rathdown County Council issued a formal opinion of the proposal, which was received by An Bord Pleanála on 06 December 2019.

8.2 Pre-Application Consultation Meeting

A pre-application consultation meeting was held to discuss the proposal on the 19th December 2019. Representatives from An Bord Pleanála, Dun Laoghaire Rathdown County Council and the Applicant attended this meeting.

8.3 An Bord Pleanála Opinion

Following consideration of the pre-application request, opinion of the planning authority and what was raised at the consultation meeting, a formal An Bord Pleanála Opinion was issued on the 17th January 2020. Having considered the issues raised during the pre-application consultation process the opinion was that the documents submitted with the request **constitute a reasonable basis for an application for strategic housing development.**

Specific information was also requested for submission with the application. A separate report has been prepared addressing the issues raised and outlining the specific information submitted.

9 Strategic Housing – Application Withdrawn

An application for Strategic Housing Development on the site was lodged with An Bord Pleanála on 30 June 2020. This application sought permission for *inter alia* 161no. residential units and the demolition of DunLeary House. This application was withdrawn on 21 September 2020 due to technical issues identified by Irish Water in their submission on the application. These matters have now been positively resolved. Please refer to the enclosed material from DBFL Consulting Engineers for further details.

During the period when the technical issues were being assessed and resolved, the Design Team were instructed to review the scheme from first principles and consider issues that had arisen during the planning process to date. This review focused on the Board's Opinion as issued under the Pre Planning Ref ABP 305866-19.

The Design Team carried out extensive studies which established that it would be possible to retain the main form of Dunleary House and boundary whilst allowing for the remainder of the site to be developed in accordance with national planning policy.

The subject scheme now reflects the design evolution and is submitted as a new application for assessment by the Board.

10 Description of Proposed Development

10.1 The Scheme



Fig 23 – CGI view of proposed development

The proposal now before An Bord Pleanála provides for the following development:

The development will consist of the construction of a new development of 146 no. units (34 no. studio apartment units, 77 no. 1 bed apartment units and 35 no. 2 bed apartment units), and associated ancillary residential tenant amenities (c.468 m²) including a gym, atrium/reception area and skylounge. A retail unit (c.290m²) addressing Old Dun Leary Road and Cumberland Street is also proposed. It is proposed to adapt and incorporate an existing 4 storey building “DunLeary House”(a proposed Protected Structure) on site into the development to provide co-working office suites (c.247m²). The proposed development has overall heights ranging from 6 storeys (with set backs from 4th & 5th storey) addressing Dun Leary Hill, to 5 and 8 storeys (with set back from 7th storey) addressing Old Dun Leary Road and 6-7 storeys (with set backs at 8th storey) addressing Cumberland Street.

Extensive residential amenity facilities are proposed (with a combined area c.468 m²) including a: gym and associated ancillary facilities at level 01G (c.120 sqm), multi-functional atrium/reception amenity areas at level 01G (c.251 m²); residential amenity (sky lounge facility approximately 97 sqm) with external terrace at level 7.

Private open space for the apartment units is proposed by way of balconies and shared landscaped terraces. Communal open space is provided in the form of a landscaped courtyard including a play area (c.482 m²) and landscaped roof terraces and external areas (c.392m² overall) with visibility from public areas

A part double height retail unit (c.290 sqm) addressing Old Dun Leary Road and the corner of Cumberland Street. 1 no. signage zone (c.6675mm x c.640mm;) on the façade addressing Old Dun Leary Road; 1 no. signage zone addressing corner Old Dun Leary Road and



Cumberland Street (c.800mm x 6000mm) and 2 no. signage zones (1 no. backlit horizontal sign (c. 6000 mm x 700mm) and 1 no. backlit vertical sign (c.5160mm x 800mm) along Cumberland Street main entrance.

The refurbishment, partial removal and adaptation of a 4 storey building on site known as “DunLeary House” (a proposed Protected Structure) to provide co-working office suites (c.247m²) at Levels 01,02 and 03. The works will include partial removal of original walls and floors, removal of non original extensions to DunLeary House, repointing and repair of brickwork and granite fabric, reinstatement of timber sash windows, removal of existing roof, removal; alteration and reinstatement of internal floor layouts, reinstatement of entrance point on DunLeary Hill, removal of non original level 00 and linking the existing building to the new development from level 00 to level 03 with the construction of 3 new floors of development (with set back at roof level) above the existing building. It is proposed to repair, reinstate and improve the existing boundary treatment to DunLeary House.

Provision of 52 no. car parking spaces in total - 44 no. car parking spaces provided at level 00. At Cumberland Street 11 no. existing on street car parking spaces will be removed and 8 no. on street car parking spaces provided. Provision of 277 bicycle parking spaces (94 no. cycle parking spaces accommodated in bicycle stands and 183 no. long term bicycle parking spaces within a secure storage area) and 4 no. motorbike parking spaces, all at Level 00. Level 00 will be accessed via a new gated vehicular entrance and gated dedicated bicycle path off Old Dun Leary Road.

All associated ancillary plant areas/switch rooms/ESB substation/waste management/storage areas to be provided at level 00, with provision of green roofs (c. 1,157m².) at roof areas on levels 01, 06,07 and 08.

Significant Public Realm improvements including the provision of footpath upgrades, a signalised junction on Old Dun Leary Road and Cumberland Street including pedestrian crossings on all arms, landscaping and 32 no. bicycle parking spaces (located to the front of the proposed retail unit and at the corner of Cumberland Street), the inclusion of car parking spaces (as referenced above) on Cumberland Street and new public lighting.

All associated ancillary site development works including:

- Demolition of open fronted shed (371.7m²) located at the north eastern corner of the site with works including replacement of part of the boundary wall adjoining Clearwater Cove.
- all associated landscape and boundary treatment proposals
- all associated ancillary water and drainage works (including the diversion of existing sewer at Cumberland Street).

The extent of the site layout is detailed in the attached Architectural Design Statement and drawings prepared by MOLA Architecture.

10.2 Residential Development

A total of 146 residential units (Built to Rent) are proposed as part of a mixed use development

Residential Mix is as follows:

- 34 x Studio Units (23.3%)
- 77 x 1 Bedroom Units (52.7%)
- 35 x 2 Bedroom Units (23.9%)

65 of the proposed 146 units proposed have the benefit of dual aspect equating to c44.5% of the residential units, above the minimum standard required for this centrally located urban site.

Heights range from 6 storeys (with set backs from 4th and 5th storey) addressing Dun Leary Hill, to 5 and 8 storeys (with set backs from 7th storey) addressing Old Dun Leary Road. The proposed heights are considered appropriate to the site and surrounding context framed by existing developments. The proposal completes the urban block by terminating the existing terrace at Clearwater Cove along Old Dunleary Road.

The architectural language responds to the context of the surrounding buildings, in particular the Victorian terraces, and provides 3 no. terraced building linked by the central circulation atrium.

10.3 Demolition

The demolition works comprise the full removal of 1no. open shed structure (c.371.7m²)



Figure 24: Shed to be demolished

It is also proposed to demolish non-original extensions to DunLeary House and carry out works necessary to incorporate the existing building into the development. The works will include partial removal of original walls and floors, removal of non original extensions to DunLeary House, repointing and repair of brickwork and granite fabric, reinstatement of timber sash windows, removal of existing roof, removal; alteration and reinstatement of internal floor layouts, reinstatement of entrance point on DunLeary Hill, removal of non original level 00 and linking the existing building to the new development from level 00 to level 03 with the construction of 3 new floors of development (with set back at roof level) above the existing building.

The extract below from the MOLA Architecture Design Statement summarises the works proposed. For full details, please refer to architectural drawings and the Architectural Heritage Impact Assessment.

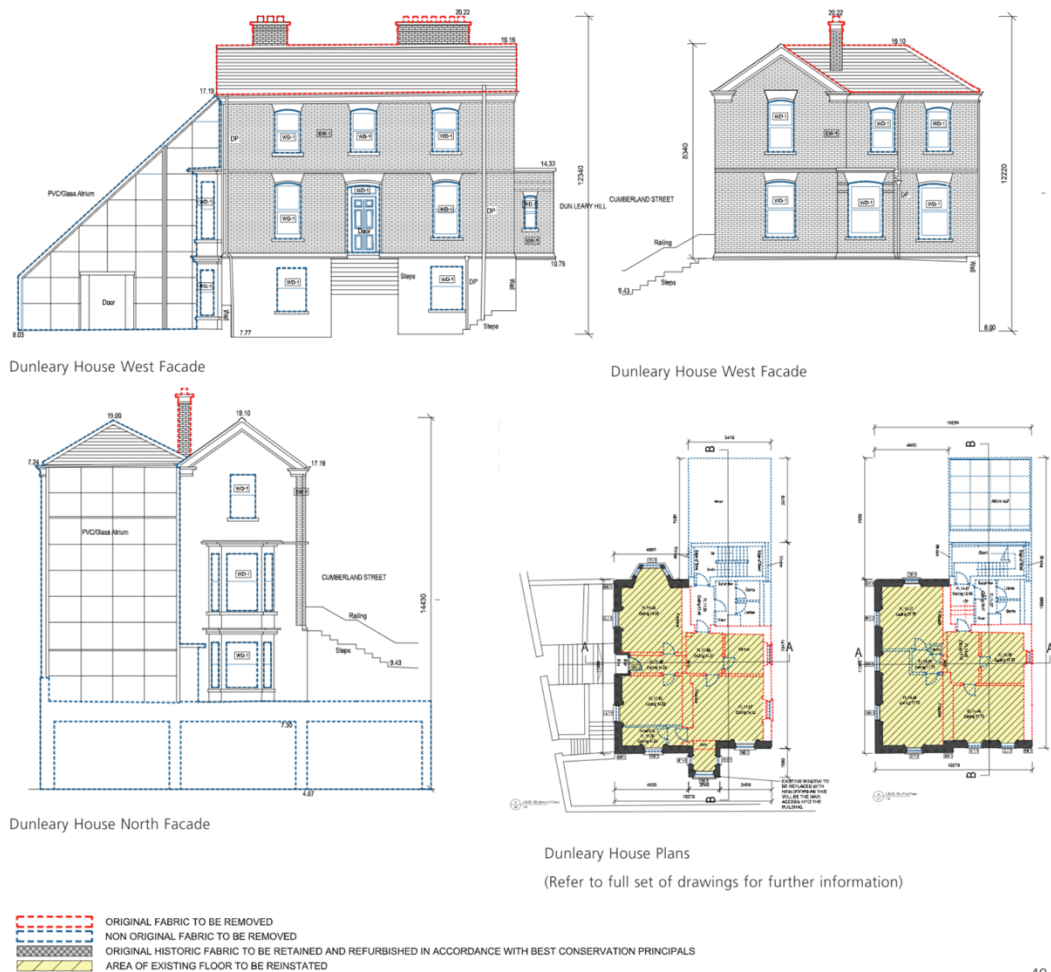


Figure 25: DunLeary House works (extract from MOLA Architecture Design Statement)

10.4 Public Realm Improvements

This application includes c. 2469m² of lands in the control of Dún Laoghaire Rathdown County Council (refer to letter of consent enclosed) which will be upgraded and enhanced as part of the development. The interface and road layout between Old Dun Leary Road and DunLeary Hill has long been an area of concern for the Council, with the wide road alignment and poor pedestrian facilities. The introduction of the Coastal Mobility Route has benefited the area, but the general streetscape is poor quality and hostile to pedestrians.

As detailed in the enclosed plans, this scheme provides for:

- large corner plaza area for pedestrian amenity and additional traffic calming measures
- Wider footpaths on Cumberland Street, road alignment and improved traffic junctions
- New and improved signalised pedestrian crossing on Old Dunleary Road to support pedestrian access to DART
- Cumberland Street narrowed for road safety
- Landscape measures in order to create a distinctive sense of place.



CHARACTER AREA 1: GROUND FLOOR PUBLIC REALM



Location plan

CHARACTERISTICS:

- » A high-quality materials and planting creating a welcoming environment
- » Retail with external seating area surrounded by dense, evergreen planting
- » Bicycle parking (on-street) for visitors
- » Improved public realm

KEY ELEMENTS:

- | | |
|----------------------------------|--------------------|
| 1. Retail terrace | 4. Cycle stands |
| 2. Versatile planting raised bed | 5. Hardscape areas |
| 3. Indoor retail | 6. Shrub planting |



Fig 26: Extract from Cameo & Partners Public Realm Landscape Plan

10.5 DunLeary House

DunLeary House has been a central consideration in the design evolution of this scheme from the outset.

10.5.1 Review of Board's Opinion

Item 1 of the Board's Opinion stated that *"notwithstanding that the proposal constitutes a reasonable basis for an application, the prospective applicant should satisfy themselves that the proposal to remove Dunleary House and associated boundary provides the optimal urban design and architectural solution for this site"*. The Opinion of the Board on this matter led to further reflection on the possibilities for DunLeary House and the elements of the building that positively contributed to the character of the area. The Design Team carried out extensive studies which established that it would be possible to retain the main form of DunLeary House and boundary whilst allowing for the remainder of the site to be developed in accordance with national planning policy.

It is now therefore proposed to incorporate the existing building into the proposed development for the overall site and to make it a focal point with the main entrance formed against the northern façade of the building. This will involve the retention of key facades and the repointing and repair of the brickwork and granite fabric as well as the reinstatement of one over one timber sash windows to the facades and the repair and reinstatement of the historic ironwork to the boundary. The bay window element to the northern façade is also to be retained and restored. It is proposed to retain the main spaces within the building as historic office suites serving the overall development with cornices, internal window and door linings and leafs all retained and reinstated. It is proposed to provide additional floors of accommodation above on an identical footprint but in a contemporary manner.

It is also proposed to demolish non-original extensions to DunLeary House and carry out works necessary to incorporate the existing building into the development. The works will include partial removal of original walls and floors, removal of non original extensions to DunLeary House, repointing and repair of brickwork and granite fabric, reinstatement of timber sash windows, removal of existing roof, removal; alteration and reinstatement of internal floor layouts, reinstatement of entrance point on DunLeary Hill, removal of non original level 00 and linking the

existing building to the new development from level 00 to level 03 with the construction of 3 new floors of development (with set back at roof level) above the existing building.

The retention of the main structure and boundary of Dunleary House accords with SLO 153 of the County Plan: ***“The Dunleary House (Yellow Brick House) and associated boundary be retained in situ and renovated”*** and the objectives of the Dun Laoghaire Urban Framework Plan which has ‘ideas’ for the Tedcastles site including : ***“Explore retention of existing house in order to provide scale and detail to street”***. It is clear that the architectural value of the existing building and boundary is the contribution of its two principle elevations to the streetscape at this corner of DunLeary Hill. This streetscape value is retained and enhanced by way of the subject scheme.

Dunleary House was constructed as a dual purpose building on a large industrial site, both a family home and commercial offices. The dual use of the building has led to an unusual design whereby both the south-facing elevation facing onto Dunleary Hill and the west-facing elevation facing onto Cumberland Street appear to be the front elevation. This dual use of the building has also led to an unconventional interior floor plan. Conservation Assessments have indicated that the floor plan of the original structure was re-ordered to adapt the structure for office use only. Major interior changes occurred which resulted in a loss of original fabric. The structure has lost many important original features including the original slate roof, original windows, original railings from boundary walls and entrance steps and original staircase, original interior joinery elements including the original staircase and original floor plan.

10.5.2 Draft County Development Plan 2022-2028

The applicant received notification on 15 January 2021 that it is proposed to ***“include the House at Dunleary House, Old Dunleary Road, Dún Laoghaire, Co. Dublin in the Record of Protected Structures (Appendix 4) in the Draft County Development Plan 2022-2028”***. The letter does not provide any rationale for inclusion of the building on the RPS, as required by the Architectural Heritage Protection Guidelines.

It is submitted that the RPS is not the appropriate mechanism to ensure that this building remains part of the streetscape. The inclusion of this building on the RPS has not come from the Minister for Housing, Local Government and Heritage. There is no NIAH survey relating to this building. Its inclusion on the RPS is explicitly not supported by the Council’s Conservation Officer or Senior Planner.

The Chief Executive’s Report on the Draft County Development Plan (July 2021) recommends a material amendment to the Draft Plan to delete Dun Leary House from the Record of Protected Structures. The Chief Executive’s Commentary on this issue (Page 630 of Report) is noted as follows:

“The building in question is not considered to be of sufficient Architectural, Historical, Archaeological, Artistic, Cultural, Scientific, Social or Technical interest to merit inclusion onto the Record of Protected Structures. Section 2.5.16 of the Department of the Arts Heritage and the Gaeltacht, ‘Architectural Heritage Protection Guidelines for Planning Authorities’ states that social interest can be attributed to a structure which has become of spiritual, political and/or symbolic interest – such as a holy well, a memorial, a statue. It can also be attributed to structures illustrating the social philosophy of a past age, as in the case of philanthropic housing (i.e. Almshouses).

The building is of relatively modest architectural merit and displays no external features of significant interest having been extensively refurbished in the past which has resulted in the loss of original windows, roof materials, and an extension that severely detracts from its appearance.

The value of this building lies solely with its contribution to the streetscape in this regard SLO 37 which states: “That Dunleary House (Yellow Brick House) and associated boundary be retained in situ and renovated and ensure its rehabilitation and suitable reuse of the building which makes a positive contribution to the character and appearance of the streetscape at this location” would retain the contribution of the structure within the streetscape. It is considered, however, that SLO37 is somewhat restrictive in nature and could be re-phrased in a manner that would allow for meaningfully development of the house and wider site whilst maintaining the character along the street.



The restoration and use of the structure is not a County Development Plan matter, rather this would be considered through the development management process.”

The Chief Executive’s Recommendation is that the building is deleted from the Record of Proposed Protected Structures as set out in the Draft County Plan. It is also recommended that the SLO relevant to the site is amended as follows:

“That Dunleary House (Yellow Brick House) and associated boundary be ~~retained in situ and renovated and ensure its rehabilitation and suitable~~ incorporated into any development of the site and suitably reuse of the building to reflect its positive contribution to the character and appearance of the streetscape at this location.

In October 2021, the Elected Members voted against the Recommendation of the Chief Executive and at the time of writing, the building is a Proposed Protected Structure. We note that the proposed amendments to the Draft Plan that are now on public display (November 2021) propose to amend the wording of the listing of this building as follows:

(351) Amend an item listed in Table 4.1 ‘Record of Protected Structures’ (page 152) of Appendix 4 as follows:

Dunleary House		Old Dunleary Road, Dún Laoghaire, Co. Dublin	Former House (excluding later 20th Century extensions)	2131	3
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10.5.3 Assessment of Impact

We refer the Board to the enclosed Architectural Heritage Impact Assessment prepared by David Slattery Conservation Architects and to the detailed drawings of the building prepared by MOLA Architecture.

The Slattery Conservation Assessment states:

It is proposed to retain and restore the former house/office building and carry out restoration works to its façade fabric - including the reinstatement of historic, multi-pane, timber sash windows, cleaning and repointing of brick and granite to the facades and boundary constructions - and to incorporate ancillary ‘historic’ office suites into the restored interiors which will retain and reinstate cornices and linings to windows and doors.

It is considered that the proposed redevelopment of the subject site is an appropriate proposal that respects the architectural heritage value of the former/house/office building. It is considered that the proposal will have a positive impact on the site, returning it to use after several years of sitting vacant. This will in turn have a positive impact on the character of the wider context.

The visual presence of the two front façades to the former house/office building has been respected in the proposed works, and this façade will be retained and conserved, thereby enhancing the contribution it makes to the character of the surrounding area.

Reinstatement of historic sash windows to match the original pattern and profile on the primary facades of Block A will have a positive impact and enhance the architectural heritage significance of the building.

The subject proposal involves the demolition of sheds and outbuildings on the site. These are not of architectural interest, have not been identified for protection and make no contribution to the character of the streetscape or of the surrounding area. These elements do not form part of the curtilage of Dunleary House and have clearly been omitted from the inscription for the proposed addition.

It is submitted that the works proposed to Dunleary House are appropriate and necessary in order to knit the building into the new development. There will be some removal of the existing building

fabric, as detailed in the MOLA Architecture drawings, in order to incorporate it successfully into the new development.



Fig 27: CGI Image by 3DBB of DunLeary House incorporated into new development

DunLeary House is to be given a new lease of life as the ‘Coal Offices’, with each floor being developed as co-working office suites, open to the general public. This land use echoes the original purpose of the building and will provide animation and activity to the corner streetscape.

The original boundary condition at the corner of DunLeary Hill/Cumberland Street is to be retained and incorporated into the development. This approach accords with SLO 153 of the County Plan and acknowledges the architectural value of this building in its relationship with the street.

10.5.4 Works to former industrial buildings

We note there is well established precedent in Dublin city for works to Protected Structures to allow for their regeneration and incorporation into contemporary projects. We refer in particular to 73 North Wall Quay (DSDZ2204/20) where a 9 storey office building is permitted to be constructed within the Protected Structure:



Figure 28: 73 North Wall Quay (a Protected Structure)



Figure 29: 73 North Wall Quay Permitted Development



No. 82 North Wall Quay (DSDZ2939/16 and DSDZ3119/18) is a 7 storey over double basement hotel building constructed within and above the Protected Structure:



Figure 30: 82North Wall Quay (a Protected Structure)



Figure 31: 82 North Wall Quay as constructed



Finally, Nos.10-12 Hanover Quay (DSDZ3856/17) is the redevelopment of a Protected Structure warehouse building to provide a multi storey office building within and above the original building.



Figure 32: 10-12 Hanover Quay (a Protected Structure)



Figure 33: Hanover Quay Re-development



Figure 34: Hanover Quay re-development.

As noted by David Slattery Conservation Architects Ltd., the retention of the outer walls of a historic structure can protect and maintain its contribution to the character of the streetscape and of the wider area, while facilitating the contemporary redevelopment of the site. As demonstrated in the examples above, the new structures constructed behind/within the historic walls are of high architectural quality and are clearly modern and contemporary in style. This ensures clear legibility of the extents of the historic building.

This is comparable to the proposed redevelopment of the former Tedcastles site, where a new multi-storey block will be constructed behind the existing western and southern walls of the Proposed Protected Structure. The relative height of the proposed new structure compared to the existing structure is considered to be appropriate to the domestic scale of the existing structure. The existing eaves of the historic structure will be retained, illustrating the original form of the roof.

10.5.5 Co-Working Office Space

The regenerated building will return to its original purpose as commercial office space within the new scheme. It is considered that this use is most appropriate for the building and will meet predicted demand in the locality for alternative work locations. The co-working office suites will be located at level 01, 02 and 03 of the building and will be accessed via Cumberland Street. It is proposed to re-instate an original entrance on Cumberland street and retain or enhance the existing boundary conditions.

The co-working space extends to c.247m² over 3 floors and has been designed to be flexible in format to suit a future operator. It is envisaged that the space will be centrally managed separate to the residential scheme, and will be fully available to the general public. We trust that matters such as hours of operation, waste management and signage can be addressed by condition once an operator has been secured to run the facility.

10.6 Tenant Residential Amenity

In accordance with the specific requirement of the Apartment Guidelines (2020) relating to Build to Rent Schemes, the proposed development provides for c. 458.9 sq m of tenant amenity Space.

This includes a:

- gym and associated ancillary facilities at level 01G
- multi-functional atrium/reception amenity area at level 01G
- a sky lounge facility with external terrace at level 7

These proposals are considered a significant addition to the overall scheme and further enhances the residential amenity associated with the proposal.

10.7 Building Height

Overall heights ranging from 6 storeys (with set backs from 4th storey) addressing Dun Leary Hill, to 5 and 8 storeys (with set backs from 7th storey) addressing Old Dun Leary Road.



Figure 35: CGI view from Old Dunleary Road

The architectural language responds to the context of the surrounding buildings, in particular the Victorian terraces, and provides 3 no. terraced building linked by the central circulation atrium. The issue of appropriate building height has been carefully considered from the outset of the design process, with heights being carefully modulated and tested for impact.

The result is a scheme that offers an exceptional level of residential amenity and an attractive visual landmark for Dun Laoghaire.

The heights proposed in this case are reflective of existing building heights in the immediate context and the development will therefore assimilate successfully into the existing streetscape.

As detailed in the enclosed Architectural Design Statement by MOLA Architecture the range of heights proposed within the former Ted Castles Site:



- Reinforces the Urban Core of Dun Laoghaire and creates a landmark entrance development at the Gateway into Dun Laoghaire from the west.
- Creates an Architectural language which responds to the context of the surrounding buildings, in particular the Victorian terraces, and provides 3No. terraced building linked by the central circulation atrium.
- Provides a landmark 'high profile' corner terminating distant views in accordance with the Dun Laoghaire Rathdown Urban Framework Plan.
- Provides a scale, height and massing which responds to its status within the Urban Core of Dun Laoghaire and surrounding buildings.
- Maximises the topography of the site utilising the 2 storey difference in height between Old Dunleary Road and Dunleary Hill.
- Delivers a strong presence whilst ensuring a sensitive approach along the site boundaries, particularly where the subject site adjoins existing residential development to ensure an appropriate transition in scale.
- Delivers a distinctive sense of place by mean of the quality Architectural form and design as well as the provision of extensive public realm improvements and the provision of a wide range of residential amenity facilities. In combination these elements will encourage social integration through the creation of a local sense of community.

It is noted that the Landscape and Visual Impact Appraisal (LVIA) prepared by Mitchell & Associates states that:

The design of the proposed development aims to provide a high-quality build-to-rent development with interface elements at ground floor level which provide an active frontage at the Old Dunleary Road/Cumberland Street junction, which will be complimentary to the commercial elements across the road. The scale of the proposed development overall is also broadly in keeping with the adjacent residential developments along the seafront. This, and its proposed lighter-toned finishes, offer continuity and harmony to the full complement of seafront buildings along this part of the town, as evidenced by the views looking back from the harbour area. The subject site is eminently suitable for such development, however in addition, the proposed design will provide a gateway to the town, of appropriate scale and of significant architectural quality.

Further details relating to the proposed height are set out in the Statement of Consistency and the Material Contravention Statement prepared by Brock McClure Planning and Development Consultants.

10.8 Retail Unit

A retail unit extending to c.290m² is proposed at ground floor level on the corner of Old Dunleary Road/Dunleary Hill. This unit will provide activity and animation to the corner, thereby enhancing the public realm.



10.9 Aspect

65 no. units (44.5%) of the 146 provided have dual aspect, maximising sunlight as well as providing cross ventilation into these units. Living spaces are carefully placed to maximise daylight in these areas. The units considered to be dual aspect have been carefully developed by MOLA Architecture to deliver an excellent standard of amenity to future residents.

In addition, the applicant appointed KPMG Future Analytics to provide an independent audit of the units proposed as dual aspect. The Report by KPMG Future Analytics provides a useful overview of metrics used to assess dual aspect residential units, which is just one indicator of housing quality, and the trends evident in decisions by the Board relative to this issue. The Report appraises the subject scheme and concludes that 65 units in the development are considered to be dual aspect (44.5% overall).

In addition to the Dual Aspect provision, additional daylight is provided into a significant amount of the single aspect Ted units as the Living Room floor to ceiling height varies from 2.6m up to 2.9m in the majority of units, with an increased window heights within units along Old DunLeary Road.

At Ground level, own door units accessible directly off the public street have a provision of private threshold space set behind a separation line and at a higher level from the public footpath.

10.10 Amenity Space

Of the 146no. units there are a total of 16no. units without a balcony (coloured orange in matrix of the HQA). Due to the predominantly north facing orientation of these 16no. units, it is proposed that the required private amenity space for these units is allocated in the form of dedicated communal rooftop terraces rather than private balconies. The design proposal provides for residents of these 16no. apartments to have controlled access to a dedicated shared large south facing terrace at level 05:

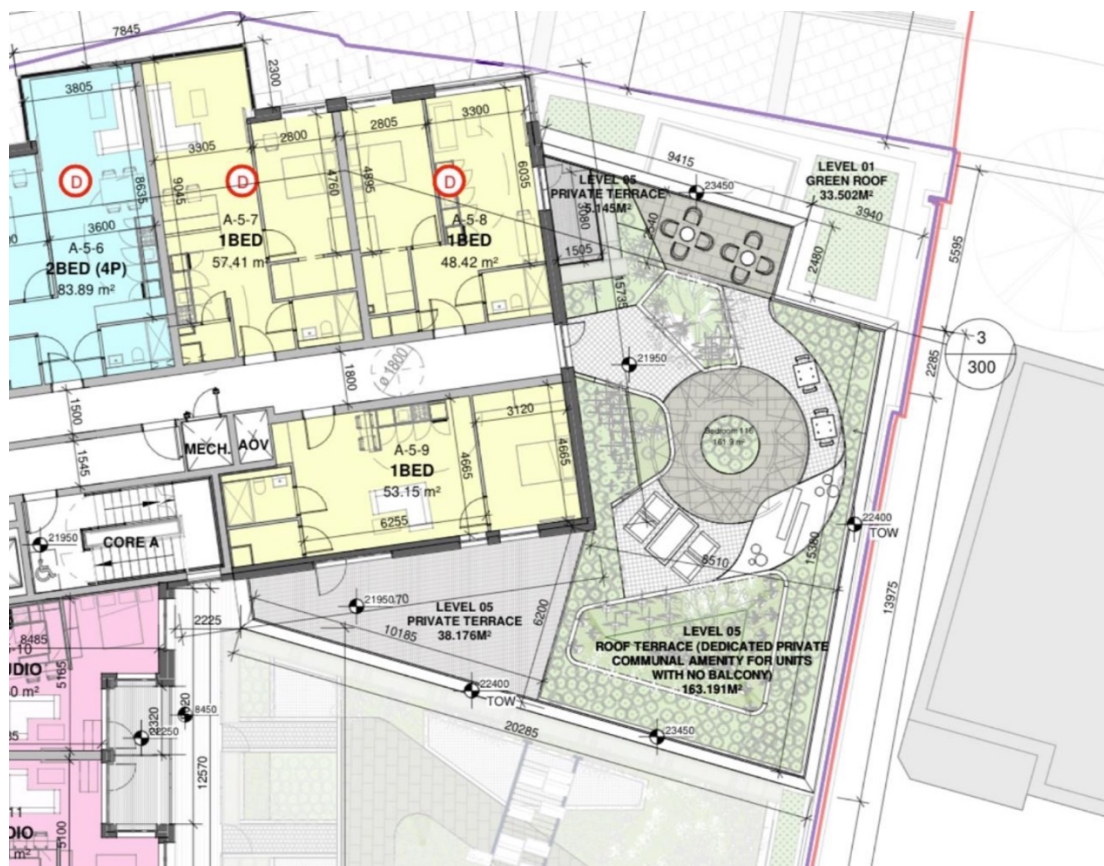


Figure 36: Extract from MOLA Architecture Level 05 Plan showing dedicated communal terrace

A total of 163sqm additional landscaped communal amenity has been provided for these 16no. units. This is in excess of the 102sqm required as the standard private amenity space combined for these units. The location of these 16 units relative to their dedicated terrace space is highlighted within the MOLA Architects Design Statement.

These communal terraces, will have high quality landscaping and will be protected from the wind. It is submitted that these communal terraces will be more beneficial and useable than small individual north facing wind swept balconies. It is submitted that the additional compensatory amenity of the shared private terrace is a higher quality amenity offering for future residents.

10.11 Community Facilities

A Community Infrastructure Statement is enclosed for review by the Board. In relation to the provision of Childcare Facilities, an assessment was carried out based on demographic analysis.

The Childcare Guidelines (2001) recommendation for new housing developments is the provision of 1 facility providing for a minimum 20 childcare places per approximately 75 dwellings. The relevant guidelines state that if it's assumed 50% of units will require childcare in a new housing area of 75 dwellings, approximately 35 will need crèche provision. However, one bedroomed units are not considered to contribute to the childcare provision under the new apartments guidelines. This may also apply in part to the provision of 2 bedroom units.

The proposed development is comprised of 146 build to rent units. **Studio units and one bedroom units are not considered to contribute to the childcare provision under the Apartment Guidelines.** In addition, it is suggested in the Apartment Guidelines that some 2 and 3 bedroom units will not require childcare.

The overall development mix is as follows:



- 34x Studio Units (23.3%)
- 77 x 1 Bedroom Units (52.7%)
- 35 x 2 Bedroom Units (24%)

It is submitted that the nature of the Build to Rent development will not require significant childcare demand given the number of studio and 1 bed units proposed (111 units in combination) and the small quantum of 2 bed units delivered. The following requirements are therefore identified:

- 50% of all 2 bed units proposed = $35/2 = 18$ units
- 18 units - 1 facility required for every 75 units = $18/75 = 0.24$
- childcare spaces required for every 75 units = $20 \times 0.24 = 5$ spaces are required to address the requirements of the proposed scheme.

Having regard to the above, it is considered that the childcare need requirements generated by the proposed Build to Rent scheme can be readily accommodated in the vicinity of the subject site.

The policy basis on which the above calculations are applied are set out further in the Statement of Consistency enclosed herewith.

10.12 Car/Bicycle/Motorcycle Parking

The enclosed documents prepared by DBFL set out full details of the car parking, cycle parking and motorcycle parking provisions of the proposed development. In summary the proposal provides:

PARKING SCHEDULE		
	BASEMENT	ON STREET
CAR PARKING (EXCLUDING ELECTRIC VEHICLE & CAR SHARE)	37	8
ELECTRIC VEHICLE (EV) CAR PARKING	4	"
CAR SHARE	1	"
DISABLE CAR PARKING	2	"
MOTORCYCLE PARKING	4	"
LONG-STAY CYCLE PARKING	183	"
SHORT-STAY CYCLE PARKING	62	32

10.13 Communal Open Space

The delivery of a central public area of open space and a quality landscape plan has been a key objective from the outset of design.

The scheme delivers central communal open space facilities in the form of an internal landscaped courtyard area (c. 481 sqm) as well as landscaped communal terraces which will be accessible to all residents of the proposed scheme, as detailed by Cameo Landscape Architects.

These terraces afford optimum views south over De-Vesci Gardens above the tree lined perimeter thus maintaining the privacy of this private parkland.

In addition, views northwards towards Dun Laoghaire harbour and Dublin Bay beyond with the added benefit of optimum orientation creates a high quality amenity provision for the residents.

The current proposal has successfully delivered on the communal open space standards of the Apartment Guidelines. The scheme provides c. 875 sqm communal open space. The details of the communal open space provision are detailed in the MOLA Architecture Housing Quality Assessment.

10.14 Density

Given the proximity of the subject site to high frequency public transport, ie the DART Stations at Monkstown/Salthill and Dun Laoghaire as well as high frequency Dublin Bus routes the residential density proposed at this site is set out as 146 units on a c. 0.559 ha site. This equates to a density of 261 units per ha.

The site area referenced above includes the public realm improvement works that form part of the application as agreed with Dun Laoghaire Rathdown County Council. A letter of consent is enclosed as part of this SHD planning application. The net density, excluding the public realm works is 474 units per hectare, which is based on the immediate ownership site of 0.308ha.

Give the high quality of the architectural proposals, the associated ancillary residential amenity space, private open space provision and communal space provision it is considered that the proposed Build to Rent Scheme will deliver a quality attractive residential development. A density of this nature is supported by national policy which is aiming to deliver increased height and densities at appropriate locations.

10.15 Part V Provision

The proposal provides for 15 Part V residential units within the scheme, which is a significant number of units in meeting the social housing requirements of Dun Laoghaire Rathdown County Council.

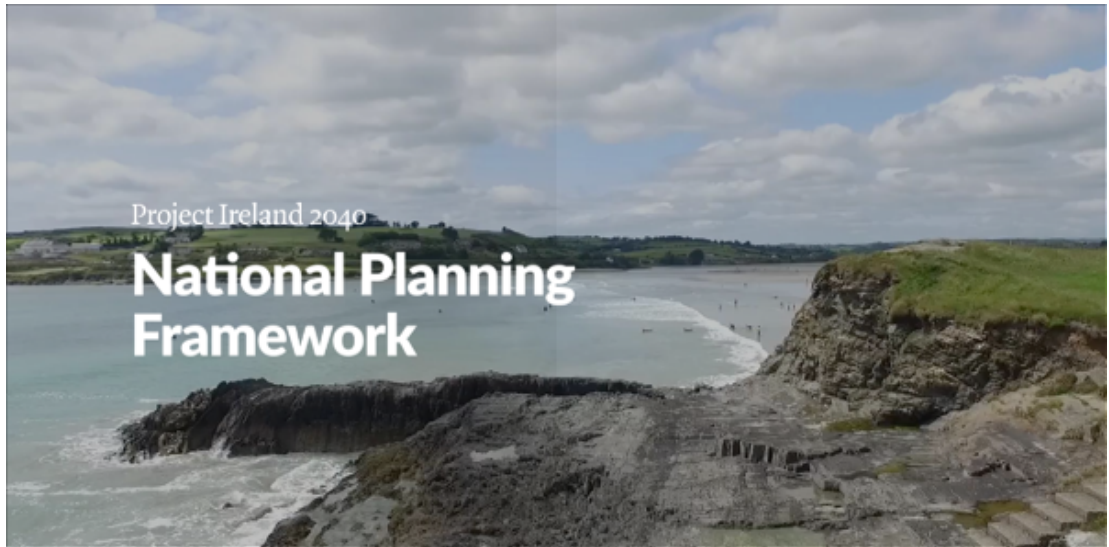
We refer the competent authorities to the detailed Part V drawing and schedule prepared by MOLA Architecture.

Note: Please note that the content of this proposal is purely indicative and is intended to provide a reasonable estimate of the costs and values of the units based on construction costs and values prevailing at the time of the application. Please also note that the information set out herewith is purely for the purposes of facilitating the making of a valid planning application and will ultimately be subject to possible amendment and formal agreement with the Local Authority. The financial data contained herein is provided to the level of detail commensurate with this stage of the Part V process having regard to Circular Letter 10/2015 and should be read as being indicative as a result. We note under the Amendment to the Act and its accompanying Regulations that the ultimate agreement with regard to Part V is dependent a) upon receipt of a final grant of permission and b) upon a site value at the time the Permission is granted; neither of which can be available at this time.

The above is obviously subject to change depending upon the nature of any final grant of permission, including Conditions and the assessment by the Housing Authority of the ultimate proposal. Final costs will be based on site value at the time the Permission is granted. Finally, we would wish to highlight that the above information is being provided on a wholly without prejudice basis in order to comply with the Planning & Development Regulations in force at this time. The final details of any agreement with the Local Authority regarding compliance with Part V, including agreements on costs will not be arrived at until after planning permission has been secured as is provided for under the Planning & Development Act 2000, as amended.

11 NATIONAL PLANNING POLICY

11.1 Project Ireland - National Planning Framework (2040)



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that it intends to achieve this vision by:

- Developing a new region-focused strategy for managing growth;
- Linking this to a new 10-year investment plan, the Project Ireland 2040 National Development Plan 2018-2027;
- Using state lands for certain strategic purposes;
- Supporting this with strengthened, more environmentally focused planning at local level; and
- Backing the framework up in law with an Independent Office of the Planning Regulator.

The strategy for the capital is as follows:

- Supporting the future growth and success of Dublin as Ireland's leading global city of scale, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new greenfield sites for housing and particularly those close to public transport corridors is key to enabling growth.

The following policies are considered the relevant policy objectives in the context of this site:

National Policy Objective 1 -



Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e. a population of around 2.85 million;

National Policy Objective 3a -

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 3b -

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

National Policy Objective 11 –

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13 –

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

National Policy Objective 31 -

Prioritise the alignment of targeted and planned population and employment growth with investment in the provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built up areas that meet the diverse needs of local populations.

National Policy Objective 32 -

To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33 -

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 35 -

Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

It is evident that the National Planning Framework (NPF) 2018, recommends compact and sustainable towns / cities and densification of urban sites including brownfield and infill sites. The themes of compact and sustainable development are further reinforced by policy objective NPO 35 from the NPF as this policy recommends increasing residential density in settlements including infill development schemes and increasing building heights.

Having considered the above, the current proposal complies with the above national policy on the following basis:

- The application for 146 residential units in a development of 4-8 storeys in height is a well - designed, high quality scheme and one that has carefully considered existing levels of residential amenities at adjoining residential development at the former Ted Castles site.

We note in particular that the residential amenity of the proposed development was considered in detail at a very early stage in the design evolution. This application includes supporting documentation from MOLA Architecture and O Connor Sutton Cronin Engineering Consultants which demonstrates specifically how the proposed development maintains existing and proposed levels of residential amenity in terms of urban design and access to daylight and sunlight specifically.

- The site is considered a central and accessible urban site and one that is appropriate for increased residential densities and heights. This is particularly the case given proximity to public transport nodes. Most notably, the site is located adjacent to 2 no. DART stations at Salthill/Monkstown and Dun Laoghaire. The site is therefore well placed in terms of exceptional public transport accessibility.
- The site represents a central location in the Dun Laoghaire urban core which can accommodate a high quality landmark residential development. The proposed development ensures a cohesive and efficient use of well serviced underutilized site.

Having considered the above, the current proposal for 146 new residential units, a retail unit, refurbishment of DunLeary House and extensive residential tenant amenity space will deliver on key objectives contained within the NPF.

We submit to the Bord that the current proposal is supportive of the objectives of the National Planning Framework for 2040.

11.2 Rebuilding Ireland: Action Plan for Housing and Homelessness



The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The plan outlines that “Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.”

The plan repeatedly states the need for housing to be in appropriate locations, locations within Dublin and urban or central locations, “In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 146 build to rent units at a key brownfield site in Dun Laoghaire. The proposal for Build to Rent Accommodation will provide alternative, affordable residential accommodation in an area of high demand. The site has the benefit of accessibility to both DART and Bus public transport services and is considered a significant opportunity site for the delivery of residential units.

Pillar 4 of the Rebuilding Ireland initiative also focuses on the delivery of rental units in Ireland.

The overall vision of Pillar 4 is as follows:

*“Government housing policy aims to ensure that, to the greatest extent possible, every household can access secure, good quality and affordable housing suited to its needs and located within sustainable communities. Within that, our vision is for **a strong, viable and attractive rental sector supported by a policy and regulatory framework that delivers long term affordable and high quality accommodation solutions meet diverse tenant needs, and a secure, predictable investment environment for landlords and accommodation providers** (page 7).”*

It is further stated that delivering on this vision will require “a comprehensive set of measure based around strategic objectives over short, medium and long term horizons. The primary focus must be on addressing the root cause of the current difficulties, which centres around a lack of supply, particularly in the middle to lower segment of the market. **A very significant proportion of the Rebuilding Ireland target of delivering 25,000 units of housing supply per annum will need to be provided for in the rental sector. The traditional dominance of the build to sell model must evolve to provide for increased deliver of housing intended specifically for rental purposes. Our perception of the section as a short - term tenure option must also evolve.** (page 7)”

This scheme for rental accommodation is considered particularly supportive of Pillar 4 of the Rebuilding Ireland Initiative. It is considered that the current proposal is a significant move forward within the Dun Laoghaire Rathdown Area in terms of the delivery of accommodation for Build to Rent Accommodation.

11.3 Regional Spatial and Economic Strategy



The RSES provides a:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.

- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the ‘Dublin City and Suburbs’ and is part of the Dublin Metropolitan Area.

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities.’”

“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”

Aside from the above core policy objectives, it is clear that the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities. In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density on the subject site and has regard to specifically to standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for planning Authorities (2020)’

and 'Urban Development and Building Heights Guidelines for Planning Authorities (2018)' in ascertaining an appropriate residential density, height and car parking provision for the site.

- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor.
- The proposal utilises a key brownfield site within the metropolitan area of Dublin in close proximity to high frequency public transport services. The delivery of residential development at this location is considered appropriate to this built up area of Dublin.

11.4 National Policy Summary

The National Planning Framework signals a shift in Government policy towards securing more compact and sustainable urban development, which requires at least half of new homes within Ireland's cities to be provided within the existing urban envelope.

A significant and sustained increase in housing output and apartment style development is therefore necessary to support government policy. National policy also recognises that at a metropolitan scale, development should focus on underutilised land within the canals and the M50 ring and a more compact urban form should be facilitated through well designed higher density development.

National policy further supports and reinforces the need for urban infill residential development in close proximity to quality transport routes and within existing urban areas. The current proposal is one such location with the site located in close proximity to 2 no. DART stations as well as Dublin bus routes and proximate to urban areas of Dun Laoghaire and Monkstown.

Given the site's zoning (which is Neighbourhood Centre and permits residential use in principle); proximity to public transport; and accessibility to local services, the current proposal is considered to comply with national policy objectives. More specifically, the delivery of residential development on this prime, infill, underutilised site, in a compact form, comprising well designed, higher density units, it is our considered view that the proposal would be consistent with the policies and intentions of the National Planning Framework, Rebuilding Ireland and Regional Spatial and Economic Strategy.

12 CONCLUSION

In conclusion, we invite the Board to consider the following:

- The applicant, Ted Living Limited (which is part of the Ardstone Group) is recognised as setting the standard in terms of the development and operation of high quality accommodation, resident amenities and professional management.
- The key objective for the site is to create a vibrant community and neighbourhood where residents will want to live underpinned by a focus on industry leading urban design, placemaking, sustainability and technological innovation.
- The subject site is a central and accessible urban location, proximate to key public transport nodes (including the DART stations at Dun Laoghaire and Salthill Monkstown as well as Dublin Bus stops) and major areas of employment.
- The apartments units proposed are of exceptional quality, with appropriate floor areas, access to quality private open space provisions, connections to public transport, bicycle and motorbike parking and car parking facilities.
- The site is optimally located and zoned to support a Build to Rent development, higher residential density and additional height in response to the current National Planning Policy mandate. The Build to Rent units are of excellent quality, with generous floor areas, communal open space provisions, improved public realm (including pedestrian crossings), thereby improving connections to public transport.
- Careful attention has been given to permeability with the surrounding context. We note specifically that the proposed includes public realm improvements (which have been discussed and agreed with Dun Laoghaire Rathdown County Council) includes the provision of footpath upgrades, a signalised junction at the Old Dun Leary Road and Cumberland Street including pedestrian crossing on all arms, provision of associated landscape measures in order to create a distinctive sense of place.
- The provision of a retail unit at Old Dun Leary Road and the re-development of DunLeary House into co-working office suites, will contribute to the integration of the proposed development to its surrounding area in accordance with the Neighbourhood Centre zoning.