



PLANNING REPORT

DUNDRUM CENTRAL SHD

PROPOSED STRATEGIC HOUSING DEVELOPMENT (SHD) ON LANDS AT CENTRAL MENTAL HOSPITAL, DUNDRUM ROAD, DUNDRUM, DUBLIN 14



Image credit - Reddy Architecture + Urbanism

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MARCH 2022



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1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, is instructed by the Land Development Agency (LDA) (referred to from hereon as the 'Applicant'), to submit this planning application for a Strategic Housing Development (SHD) on lands at the Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14. The lands remain in the ownership of the Office of Public Works (OPW) (please see enclosed Letter of Consent).

The proposed development will provide a significant and strategically important residential development, comprising 977 no. affordable new homes. As well as responding to acute housing need, the proposed development will provide approximately 3.05 ha of public open space which has been carefully designed to serve both the new and existing communities as well as maintaining the open character and important landscape features, unique to these former Institutional lands.

Given the former 'institutional' nature of the lands, the proposed development is subject to specific policy objectives pertaining to institutional lands. This includes (*inter alia*) a requirement to produce a Masterplan in consultation with the local authority and retain the open character of the lands whilst providing a minimum of 25% open space.

In this regard, the redevelopment of the application site is supported by a comprehensive Masterplan which provides for approximately 1048 no. units and fully accounts for the provisions of the Institutional policy objective attached to the lands. The Masterplan has been developed by a multidisciplinary project team, in consultation with the public and Dún Laoghaire Rathdown County Council. The enclosed *Masterplan* document, provides further details of this process including the key design parameters.

The proposed SHD forms part of a Masterplan for the wider site area of 11.39 ha. In addition to the development described in this Statement, the site wide Masterplan provides for the adaptive re-use of the main hospital building, associated open space and further residential development to the rear of hospital (approximately 71 no. additional units). The LDA intend to submit a separate planning application to Dún Laoghaire Rathdown County Council under Section 34 of the *Planning and Development Act 2000*, in respect of the aforementioned adaptive re-use. This application submission relates to the SHD proposal only. The development strategy briefly touched upon here is discussed in greater detail in Section 1.2 of this Report.

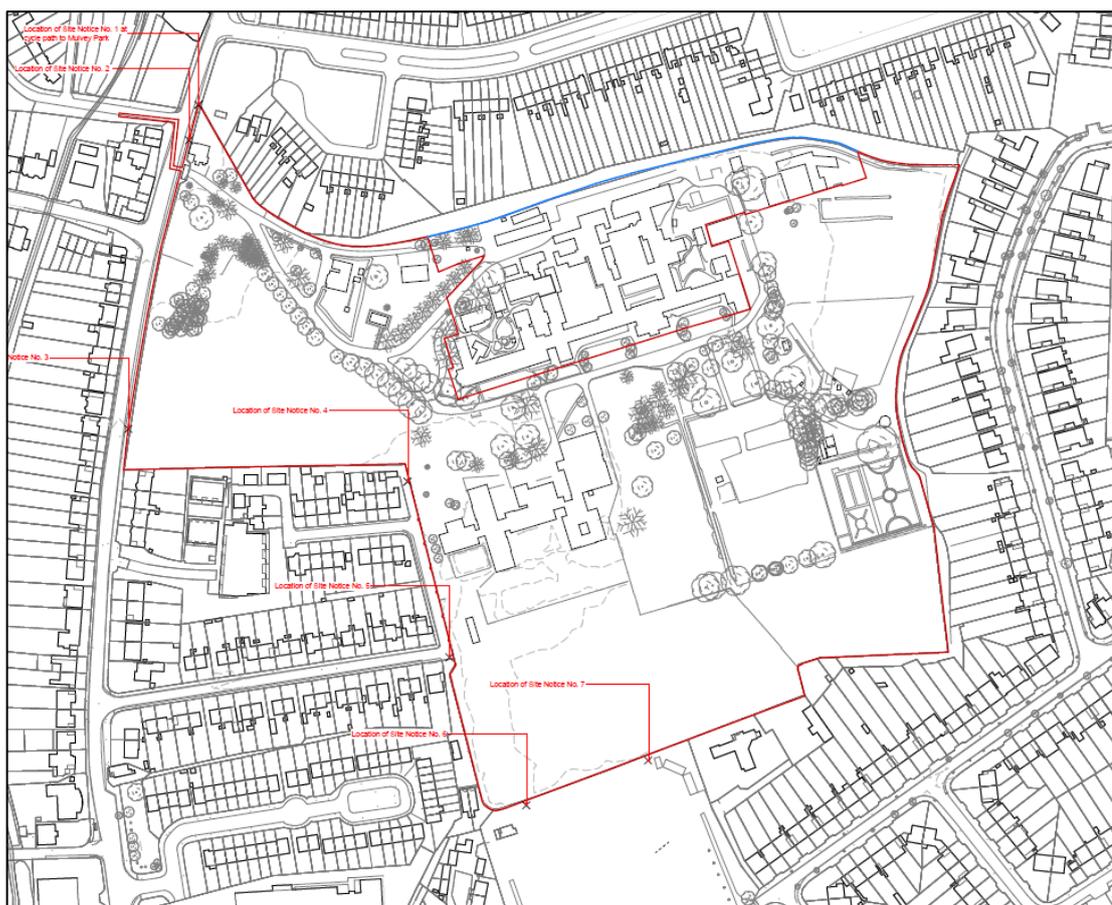


Figure 1.1: Extract from the Site Location Plan, prepared by Reddy A+U.

1.1 Rationale for Development and Vision for the Central Mental Hospital Lands

The LDA is making a significant positive contribution towards enabling an affordable housing sector in Ireland. As part of this, the LDA is working towards providing new homes and making them available to individuals and families through the schemes provided by the enactment of the *Affordable Housing Bill 2020*.

Within the remit of the LDA to deliver significant housing growth, it is the LDA's vision to transform the Central Mental Hospital site in Dundrum into a leading example of sustainable living which delivers a mix of tenures where people of all ages can live, whilst retaining and celebrating the site's historic assets and providing an outstanding destination for leisure with distinctive and diverse public spaces. Further to this, the LDA is focused on realising compact growth which promotes modal shift towards healthy, active and sustainable mobility.

Further detail surrounding the function of the LDA is contained within Section 14 of the *Land Development Agency Act 2021*.

1.2 Development Strategy

In summary, the development strategy surrounding the delivery of the Masterplan for the entire land holding comprises a dual application approach, includes:

- i) a SHD planning application to An Bord Pleanála (this application); and
- ii) a Section 34 planning application to Dún Laoghaire-Rathdown County Council.



Both planning application proposals have been designed to 'standalone' to enable independent assessment and implementation. They will be submitted in a consecutive fashion with the submission of the Section 34 application following the determination of the SHD application.

The Masterplan provides a comprehensive plan for the entire landholding and underpins the two planning applications. Importantly, the development strategy prioritises the delivery of a significant number of homes, in line with the specific remit of the LDA to provide new homes and make them available to individuals and families through the schemes provided by the enactment of the Affordable Housing Act 2020.

The proposed development strategy is further rationalised and contextualised below.

1.2.1 Rationale and Context for Development Strategy

The application site's Institutional/ INST Objective designation and the associated policy requirements under Policy RES5: 'Institutional Lands' and Section 8.2.3.4 'Additional Accommodation in Existing Built-up Areas', contained within the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, requires the preparation of a Masterplan for the lands.

In accordance with the above policy requirements, the Applicant has prepared a comprehensive Masterplan for the Central Mental Hospital lands which provides a detailed proposal for these Institutional lands in their entirety. The Masterplan proposal has evolved over a 12-18 month period and has been subject to a detailed consultation process with the public, Dún Laoghaire-Rathdown County Council (DLRCC) and An Bord Pleanála, in line the Development Plan requirements, the SHD process and the LDA's responsibilities as a state body. The consultation process is further detailed in the enclosed *Report on Stakeholder and Community Engagement*, prepared by KPMG and summarised in Sections 2.6 and 2.7 of this Report.

The delivery mechanism for the Masterplan itself is not prescribed by planning policy; there are no planning policy or legislative requirements that direct a particular development strategy. We note that the masterplan itself does not set the framework for any development consent nor has it, or will it, be adopted by DLRCC. The development strategy for the Central Mental Hospital lands is underpinned by the Masterplan proposal which provides a detailed framework for planning application proposals at the site. The strategy reflects a number of site-specific circumstances, their interaction with the SHD provisions, and the LDA's remit to deliver a significant number of new homes.

As noted briefly above, the particular development strategy for the delivery of the Masterplan comprises the lodgement of a Strategic Housing Development (SHD) for the main residential element of the Masterplan (this planning application) which will be considered by An Bord Pleanála under the SHD provisions, and a further planning application to DLRCC under Section 34 of the *Planning and Development Act 2000* (as amended) relating to the non-residential adaptive re-use of the existing buildings and some further residential development. This is shown by the illustrative Development Strategy Plan below.



Figure 1.2: Image depicting the Development Strategy, showing the SHD red line boundary vs. S34 red line boundary, prepared by Reddy A+U.

It is further noteworthy that the *Environmental Impact Assessment Report (EIAR)*, which accompanies this SHD planning application, includes detailed cumulative impact assessment of the SHD proposal and the Section 34 proposal. This recognises the close relationship between the two planning application proposals and ensures full environmental assessment of all cumulative impacts should both developments be implemented, as planned.

The development strategy is largely influenced by the SHD legislative provisions which limit the quantum of non-residential floorspace that can be applied for in an SHD application. In this regard, the internal form of the Main Hospital Building (which forms an important component in realising the sustainable development of the lands) reflects its historical (and current) use as a high security mental health facility, which, paired with the sensitivity of the building fabric from a built heritage perspective, results in significant constraints surrounding the future use of the building. The Masterplan proposal for the main hospital building reflects this; the proposed enterprise centre use is considered to be an appropriate use of the building, giving consideration to existing internal layout and the amount of unacceptable intervention that would be required to achieve residential conversion. By virtue of the scale of the Main Hospital Building, the proposed adaptive re-use to a non-residential use is not achievable through the SHD process and is therefore proposed to follow the Section 34 planning application process.

Further to this, the Masterplan proposal includes a quantum of residential development to the rear of the Main Hospital Building which is included within the Section 34 proposal. This recognises the integral relationship between this particular area of residential development and the Main Hospital Building and the potential complexities from an assessment perspective should it form part of this SHD proposal (as raised by DLRCC and ABP during pre-application consultation). The revised placement of the red line boundary between the two proposals therefore responds to the concerns raised in this regard.

Additionally, the preparation and submission of the planning applications has been constrained by the delayed vacation of the Central Mental Hospital complex by the HSE and



associated service users. This has resulted in restricted access to the main hospital building for the detailed survey work that is required to support an application for the adaptive re-use of the building.

We therefore confirm that the two applications will be submitted consecutively, with the submission of the Section 34 planning application following the determination of this SHD application. Under this development strategy, the SHD proposal will be determined by the Board, before DLRCC are required to assess the Section 34 proposal. This will enable a clear planning baseline for the purposes of the assessment of the Section 34 application; the latter application will have the benefit of review of the SHD planning decision and its related assessment and can ensure any issues arising can be addressed in full.

This development strategy also prioritises the SHD and delivery of a significant number of new homes in line with the LDA's remit.

In conclusion, the proposed development strategy is underpinned by a detailed Masterplan proposal which facilitates the realisation of the LDA's vision for the entire Central Mental Hospital lands. The dual planning application approach responds to a number of site-specific circumstances, their interaction with the SHD provisions, and the LDA's remit to deliver a significant number of new homes. Importantly, the proposed strategy utilises a well-established statutory planning mechanism introduced to fast track the delivery of residential development, which aligns with the LDA's remit to deliver housing. In addition to this, we confirm that the LDA are fully committed to the delivery of the adaptive re-use of the Main Hospital Building and consider it to form an integral part of their vision for the lands. To mitigate complexities surrounding assessment and delivery, each application proposal has been carefully designed to stand alone from both an assessment and delivery perspective but equally, will be seamlessly deliverable in tandem.

1.2.2 Application for 10 no. Year Planning Permission

Due to the length of the construction programme, arising from the scale of the proposed development, it is considered prudent to apply for a 10 year planning permission to facilitate the required period of construction.

Refer to the *Construction and Environmental Management Plan*, prepared by Barrett Mahony Consulting Engineers.

1.3 Summary of Proposed Development

In summary, the proposed development will have a total gross floor area of c. 106,770 sq m (c. 106,962 sq m excluding retained existing buildings) and will consist of the following:

- 977 no. residential units;
- 3,889 sq m of non-residential floorspace;
- c. 3.05 ha (c. 30,513.9 sq m) 'public open space', c. 31.8 % of the total site area.
- Partial demolition of perimeter wall and creation of new vehicular, cyclist and pedestrian access points;

- Demolition of existing structures (3,497 sq m);
- Ancillary development, including 547 no. car parking spaces.

1.4 Overview of Changes Since Pre-App Submission

Since the pre-application stage, a number of design changes have occurred. Both the site wide Masterplan and the detailed SHD scheme have been revised to address a number of issues identified by the pre-application consultation process, design team and Applicant.

The changes to the Masterplan are detailed within the enclosed *Masterplan Report*.

A summary of the main changes to the SHD scheme is provided below:

- Changes to the development strategy and associated changes to the SHD red line boundary;
- Amendments to the building height strategy resulting in an overall reduction of height and maximum height of 6 storeys;
- Amendments to the residential car parking ratio to increase the number of spaces provided;
- Alterations to the design of works to the Gate Lodge to increase permeability and to facilitate new cyclist connection to Mulvey Park;
- General design changes to the built form and landscape to enhance design quality of scheme and relationship with context

1.4.1 The Pre-Application SHD Scheme Vs. Final SHD Scheme

Table 1.1: Comparison between Pre-Application Scheme and Final SHD Scheme

Development Statistic	Pre-Application SHD Scheme	Final SHD Scheme (current scheme)
Site Area	10.9 ha	9.6 ha
No. of Residential Units	1,259 no. units	977 no. units
Non-Residential Floorspace	4,450 sq m	3,889 sq m
Gross Residential Density	115 units p/h	102 units p/h
Net Residential Density	117 units p/h (based on net site area of 7.1 ha)	150 units p/h (based on net site area of 6.54 ha excluding public open space and Gate Lodge*)
Plot Ratio	1:2:1	1.11
Site Coverage	32.6%	32%
Height	2 – 11 storeys	2 – 6 storeys (with 7 storey elements at Block 03 and 10 due to lower ground floor)
Car Parking	540 no. spaces (390 no. residential spaces (0.3 spaces per unit) and 150 no. non-residential and visitor)	547 no. spaces (489 no. residential spaces (0.5 spaces per unit) and 58 no. non-residential and visitor)

1.5 Project Team

This submission was prepared on behalf of the Land Development Agency by the following expert team:

Table 1.2: Key Consultants of Project Team

Discipline	Consultant
Project Lead/ Lead Architect	Reddy Architecture + Urbanism
Masterplanner	Tyréns UK
Town Planning Consultant	Tom Phillips + Associates
Engineer	Barrett Mahony Consulting Engineers
Transport Consultant	ILTP
Heritage Consultant	Alastair Coey Architects
Landscape Architect	Aecom
Ecologist	Altemar Ltd.
Ornithologist	MKO and Flynn Furney Environmental Consultants.
Daylight and Sunlight Consultant	GIA
Townscape and Visual Impact	Macroworks
Archaeologist	IAC
Noise Consultant	AWN
Waste Consultant	AWN
Air Quality Consultant	AWN
Wind Consultant	B-Fluid

1.6 Purpose of this Report

This Planning Report should be read in conjunction with the *Statement of Consistency*, prepared by Tom Phillips and Associates, which outlines the overall compliance of the proposed development with national, regional and local planning policy. This Report sets out an overview of the proposed development, the site context from a locational, planning and environmental context and any relevant planning history. The enclosed *Response to ABP Opinion*, prepared by Tom Phillips and Associates, also provides a detailed reasoning for any changes made to the scheme in respect to either An Bord Pleanála or DLRCC concerns/comments.

For full details on the design and the design quality of the proposed development, refer to the enclosed *Design Report*, prepared by Reddy Architecture and Urbanism and the *Landscape Architecture and Public Realm Design Report*, prepared by Aecom. The design quality and standard of accommodation proposed by the residential component of the scheme is detailed in the *Housing Quality Assessment (HQA)*, prepared by Reddy Architecture and Urbanism.

For site wide context, refer to the enclosed *Masterplan* document, prepared by Reddy Architecture + Urbanism in conjunction with Tyréns UK.

1.7 Structure of Planning Documentation – Addressing the *Draft Dún Laoghaire Rathdown County Development Plan 2022-2028*

The nature and extent of the planning documentation and assessment provided in respect of the proposed development recognises that it is a period of transition for planning policy in Dún Laoghaire-Rathdown.



In this regard, we note that the Draft County Development Plan 2022-2028 went on public display on 12 January 2021.

The County Development Plan 2022-2028 was adopted by elected members on 10th March 2022. It is understood that the adopted Plan will come into force 6 weeks after it was adopted on 21st April 2022.

We note that while the *Dún Laoghaire-Rathdown Development Plan 2016-2022* remains in legal effect at the point of the lodgement, we expect that the new County Development Plan 2022-2028 will be in legal effect at the time that the decision is made by An Bord Pleanála.

To this end, we confirm that a supplementary version of both the *Statement of Consistency* and *Material Contravention Statement*, which address the compliance of the proposed development with the Draft County Development Plan, also accompany this planning application submission. In our view, this provides An Bord Pleanála with all the information required to determine the planning applicant against whichever is the relevant Plan at that time.

We note that the final wording of the new County Development Plan is not in the public domain at the time of writing, however, this submission provides as much information and assessment as possible in this regard.

2.0 SITE AND PLANNING CONTEXT

2.1 Site Location

The application site is located at the Central Mental Hospital lands in Dundrum, Dublin 14. The site is currently still occupied by the HSE and is expected to be vacated in 2022.



Figure 2.1: Aerial image of the entire Central Mental Hospital site of approx. 11.3 ha (i.e. the Masterplan lands), shown in the context of surrounding existing development (annotated by Reddy Urbanism and Architecture, 2021)

The SHD application site is 9.6 ha, is bound by a 4 – 5 m perimeter wall and is accessed via an entrance off Dundrum Road. The overall site which is 11.3 ha comprises a number of existing buildings including the Main Hospital Building, the Chapel, the Infirmary and a number of associated buildings and small temporary structures. The site also consists of a number of landscape features such as a walled garden, an orchard and mature trees.

In terms of statutory designations, both the Main Hospital Building and the Chapel appear on the National Inventory of Architectural Heritage (NIAH):

- Hospital (Reg. No. 60220001) – Rated as ‘National’ importance;
- Chapel (Reg. No. 60220002) – Rated as ‘Regional’ importance.

Furthermore, the *Dún Laoghaire Rathdown Draft Development Plan 2022-2028*, which was issued for display in January 2021, listed a number of structures at the site as ‘proposed Protected Structures’. The ‘Asylum’, ‘Catholic Chapel’ and ‘Hospital Building’ were also included in the Record of Protected Structures:

- Asylum (RPS No. 2072);
- Catholic Chapel (RPS No. 2071); and
- Hospital Building (RPS No. 2073)

In terms of surrounding existing context, Dundrum Road and the Luas Green Line is located to the west of the site, each providing a strong north-south connection. The site is bound by residential properties and gardens at Mulvey Park to the north, at Friarsland Road to the east, at Larchfield Road to the south and south east and at Annaville Grove, Annaville Park and Annaville Terrace to the west. The surrounding residential properties are generally one or two storeys in scale with a four storey apartment block located close to the site boundary near Annaville Grove. In addition to the residential properties referred to above, part of the sites southernmost boundary abuts Rosemount Green, a DLRCC public open space and football pitch.

The site is well served by existing public transport infrastructure; the nearest Luas Green line stop is located approximately 450m west of the site at Windy Arbour. Dublin Bus network infrastructure includes stops at Dundrum Road (R117), Goatstown Road (R825), Churchtown Road and Taney Road (both R112).

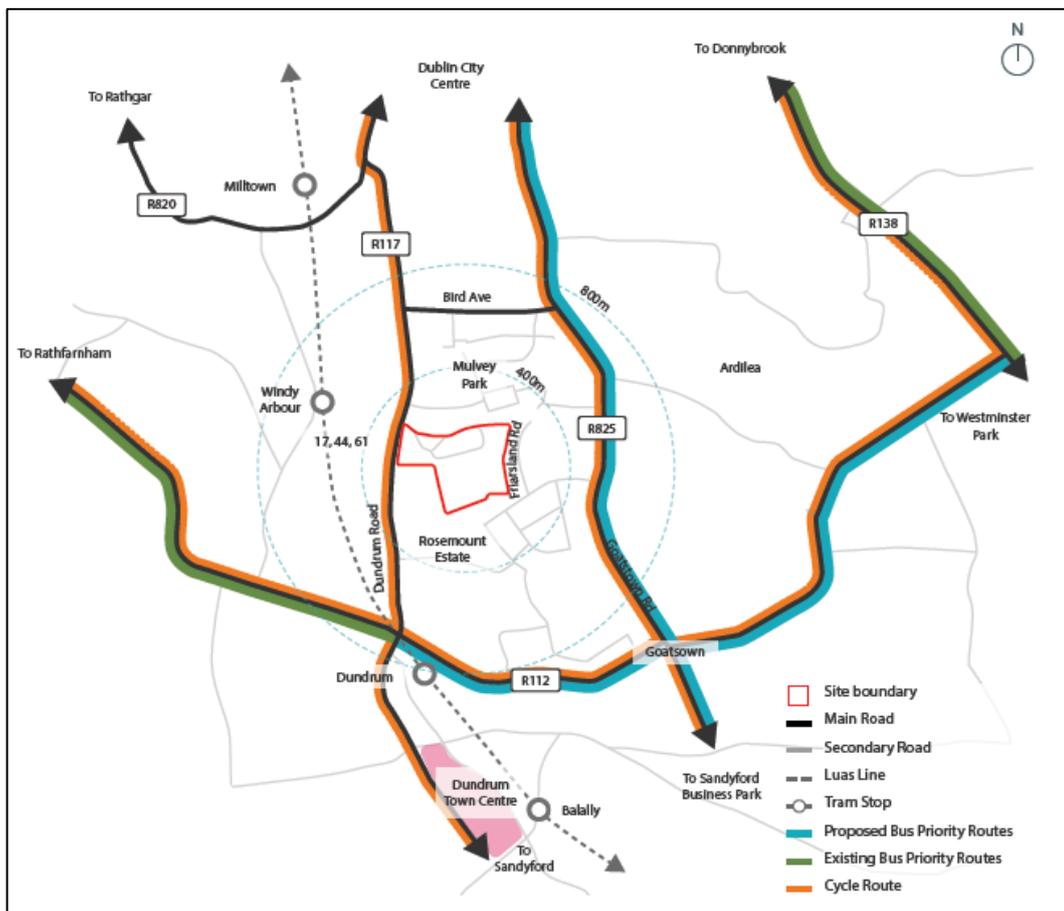


Figure 2.2: Extract from the *Masterplan* document showing wider site context, including transport connectivity.

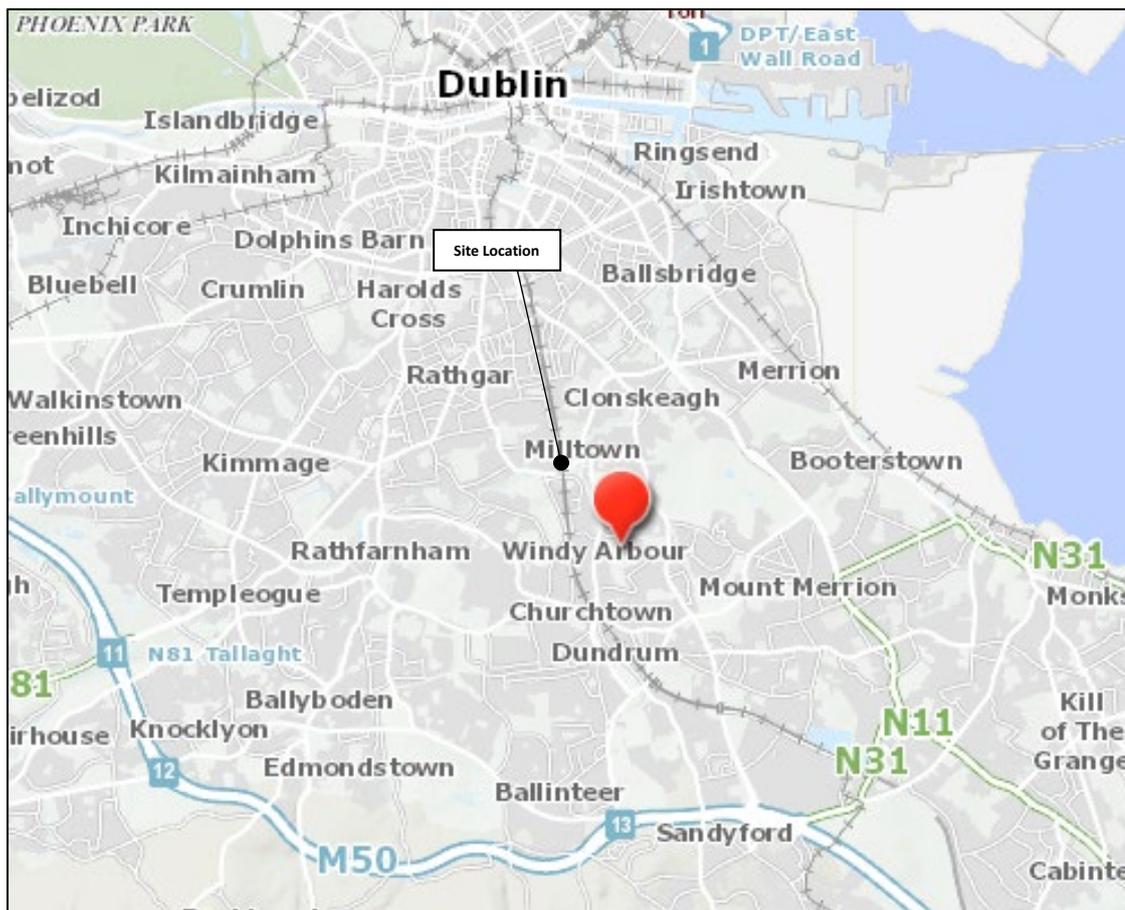


Figure 2.3: Urban Context Map (Source: www.geohive.ie, cropped by TPA, 2021)

2.2 Characteristics of the SHD lands

As set out Section 1.2 of this Report, this planning application relates to the lands associated with the SHD component of the site-wide Masterplan only.

The majority of the existing site buildings that would be considered to have most heritage value are located outside of the application red line boundary, with exception of the Gate Lodge, located close to the existing site entrance. Other existing buildings which are proposed for demolition are included within the red line boundary and comprise the following:

- Former swimming pool / sports hall and admissions unit;
- Two storey redbrick building;
- Temporary structures including single storey portacabins, sheds, greenhouses etc.

The perimeter wall, which is 4-5 m in height is also included within the red line with exception to the stretch of wall located to the rear of the Main Hospital Building.

In terms of landscape features, the existing walled garden, the vast majority of mature trees and the orchard are within the SHD application site.



Figure 2.4: Aerial Imagery of the subject site and surrounds; SHD site boundary shown in red.

2.3 Wider Environment of Subject Site

The wider environs of the site are predominantly characterised by low scale residential. However, there are a number of commercial uses within close proximity.

This includes Dundrum Town Centre (and Shopping Centre), approx. 1.6 km to the south of the application site entrance. From the site, Dundrum Town Centre is reachable in 20 minutes by foot, 6 minutes by bike and 7 minutes by bus.

Dundrum Business Park is located approximately 200m to the north of the site which comprises a number of office blocks and associated car parking.

Dublin City Centre is located approximately 7.2 km from the application site and accessible by both Luas (27 minutes) and bus (22 minutes).

There are a number of schools in close proximity, namely, Our Lady's National School, Jesus and Mary College, Our Lady's Grove and Our Lady's Grove Primary School. University College Dublin (UCD) is located within c. 1 km (as the crow flies) to the northeast of the application site.

In terms of retail provision, as noted above, the proposed development site is located c. 1km north of Dundrum Town Centre, which is identified as a 'Level 2 – Major Town Centre' within the Retail Hierarchy for the Greater Dublin Area (GDA) set out in the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*.

2.3 Masterplan Context

The SHD proposal is underpinned by a site wide Masterplan, prepared in line with the Development Plan policy requirement arising from the site's Institutional Lands designation and to ensure the comprehensive redevelopment of this 11.3 ha landholding. As noted



previously, the Masterplan itself does not set the framework for any development consent nor has it, or will it, be adopted by DLRCC

The Masterplan provides for approximately 1,048 no. residential units and forms the basis of the high-quality and sustainable redevelopment of the subject lands and conveys the development vision of the LDA embedded within urban design principles for density and sustainable design. It provides a firm basis for the development of an accessible, permeable and environmentally sustainable neighbourhood. It takes into consideration the site's unique location and heritage while balancing considerations of affordability, environmental sustainability, development standards and safety, mobility, conservation and placemaking.

As part of this, and in line with the aforementioned requirements arising from the Institutional nature of the lands, the Masterplan retains the open character of the lands and provides a significant quantum of high-quality open space which incorporates a number of important landscape features unique to the Central Mental Hospital lands.

Furthermore, the Masterplan underpins the dual planning application approach discussed in detail in Section 1.2 of this Report, with the proposed SHD development forming a key delivery mechanism for the redevelopment of the lands.

The Masterplan has been developed in consultation with DLRCC and has been subject to a public consultation process with the community and local stakeholders. As described within the *Masterplan Report*, the Masterplan has evolved since the pre-application stage to respond to a number of concerns and issues identified by the An Bord Pleanála, DLRCC, the design team and Applicant. The masterplanning of the site has therefore been an ongoing process and has adapted to site specific complexities, with a number of interactions between constraints which have resulted in amendments to the Masterplan itself.

Whilst the current Masterplan does not vary significantly from the pre-application stage Masterplan, in our view, the current Masterplan results in a site-wide proposal that optimises the development potential of the lands whilst balancing various challenges surrounding site and delivery constraints.

Refer to the *Masterplan Report* for full details.



Figure 2.5: Illustrative masterplan for the Central Mental Hospital lands, prepared by Reddy A+U.

2.4 Environmental Context

Environmental Impact Assessment

In accordance with the EIA Directive and the *Planning and Development Regulations 2001 (as amended)*, the SHD application is supported by an *Environmental Impact Assessment Report (EIAR)*.

As set out within the introductory chapters of the enclosed EIAR, Schedule 5 (Part 2) of the *Planning & Development Regulations 2001 (as amended)* sets mandatory thresholds for each project class for which EIA is required. Sub-sections 10(b)(i) and 10(b)(iv) address ‘*infrastructure projects*’ and refer to housing and urban developments. We set out the basis upon which an EIAR for this project is required below.

Subsection 10(b)(i):

“Construction of more than 500 dwelling units”

This Project comprises a strategic housing development including 977 no. residential units and c. 3,889 sq m of other (non-residential) uses. The Project exceeds this threshold and therefore an EIA is required in the context of this Class of the Regulations.

Subsection 10(b)(iv):

“Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere”



(In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)”

The SHD Project relates to a site of c.9.6 ha and is located within an area which comes within the definition of “*other parts of a built-up area*”. The Project therefore does not exceed the threshold of 10 hectares, with respect to site area of the proposed development, however it is noted that the overall Central Mental Lands (to which the Masterplan relates) are 11.3 ha in area. Regardless, an EIAR is already triggered in respect of 10(b)(i).

Importantly, especially given the development strategy that underpins this proposed SHD, we confirm that the enclosed EIAR includes a detailed and robust cumulative impact assessment which has regard to the impact of the proposed SHD in combination with applicable surrounding committed and planned projects. This includes the Section 34 proposal. The other development projects considered relevant for cumulative impact assessment were identified in line with methodology which is explained in detail in Chapter 22 of the EIAR.

In respect of the planned projects identified, we further note that planning permission may have been granted in relation to any of the below planned/ undetermined schemes at the point at which An Bord Pleanála assess the proposed development. We do however note that the Board will therefore be in a position to take account of such projects as part of its assessment process, assisted by the assessment provided within the EIAR in respect of these projects.

Appropriate Assessment

In addition, this planning application submission is accompanied by a *Natura Impact Assessment* (NIS), prepared by Altemar Ltd., which supports the Appropriate Assessment Process in line with the EU Birds and Habitats Directives.

Ecological Surveys

Furthermore, we confirm that extensive ecology survey work has been undertaken to support this application, providing a strong basis for the assessment undertaken in respect of the Biodiversity Chapter of the EIAR and the NIS. We confirm that the following surveys have been undertaken:



Table 2.1: summary of the ecology surveys undertaken in respect of the proposed development.

Survey	Surveyor	Date
Habitat	Bryan Deegan (MCIEEM)	13 th August 2020 21 st August 2020 10 th August 2021
Flora	Bryan Deegan (MCIEEM)	13 th August 2020 15 th September 2021 10 th August 2021 12 th October 2021
Bat Surveys (inspections, static detector and emergent)	Bryan Deegan (MCIEEM)	13 th August 2020 21 st August 2020 10 th August 2021 12 th October 2021
Mammal	Bryan Deegan (MCIEEM)	23 rd February 2021
Wintering Bird 2020/2021	Kathryn Sheridan and Donnacha Woods	12 no. surveys from September 2020 to the March 2021.
Wintering Bird 2021/2022	Flynn Furney Environmental Consultants (Billy Flynn and Eric Dempsey)	Surveys from November 2021 to February 2022 (ongoing to March 2022)*

* The 2021/2022 season of wintering bird surveys at the site are ongoing at the time of writing. Flynn Furney Environmental Consultants have prepared a *Winter Bird Survey Report* (appended to the EIA as Appendix 8.2) which reports on survey findings up until February 2022. On this basis, this submission is considered to provide as up to date as possible survey data surrounding wintering birds whilst allowing the planning application submission, including the EIA preparation process, to be finalised ready for timely submission in the context the SHD deadlines.

Flood Risk

The site features a gradual slope downwards from the southwest corner towards the northeast corner, and from the western portion of the site downwards to the Dundrum Road entrance. The site also features 2 no. natural catchment areas.

The subject site is in Flood Zone C, which describes a site “where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1,000 for both river and coastal flooding”.

The proposed development falls under the OPW classification of Highly Vulnerable Development due to the presence of residential units across the site, but is situated in Flood Zone C which is at the lowest flood risk level and therefore is an appropriate site for Highly Vulnerable Development.

A *Site-Specific Flood Risk Assessment*, prepared by Barratt Mahony Consulting Engineers, is enclosed with the application.

2.5 Strategic Planning Context

As set out in detail in the *Statement of Consistency*, there is a full suite of national and regional planning policy and guidelines which supports the proposal of a significant quantum of

housing in the context of achieving higher density development, increased building height and compact growth.

Alignment of the proposed development with the relevant national and regional policy objectives is set out in Section 3 of the *Statement of Consistency*. It confirms that as a brownfield, publicly owned, well-located site in an existing urban area, this application site and the development proposed has the potential to significantly contribute to national policy objectives surrounding compact growth.

In terms of the local policy context, the subject lands benefit from a residential land zoning under the provisions of the *Dún Laoghaire-Rathdown Development Plan 2016-2022* (as varied) - the specific zoning 'Objective A' is "*to protect and/or improve residential amenity*". As well as residential development being 'permitted in principle', we confirm that the proposed non-residential uses are 'open for consideration' under this zoning objective.

Furthermore, the application site is subject to the INST objective, arising from the Institutional nature of the lands. This attracts specific Development Plan policy requirements which are provided for as part of the proposed development and referred to in greater depth in the *Statement of Consistency*.

At a strategic level, we note that the Core Strategy of the Development Plan, on the basis of projected housing demand, supports the overall delivery of 33,600 new homes during the Plan period. We therefore highlight that the proposed development, which seeks to deliver 977 no. new residential units on serviced well connected land, would make a significant contribution towards housing delivery in Dún Laoghaire-Rathdown.

The enclosed *Statement of Consistency* also addresses the compliance of the proposed development with the Draft *Dún Laoghaire-Rathdown Development Plan 2022-2028*. From a strategic standpoint, we note that the site is identified as a 'Strategic Regeneration Site'; such sites have been identified in recognition of their potential role in increasing the efficiency of urban land-use and delivering compact growth targets.

In addition to this, we acknowledge the 'Strategic Outcomes' of the Draft Development Plan, as outlined in Figure 1.4 of Chapter 1 *Introduction, Vision and Context*. We draw particular attention to DLRCC's strategic commitments in relation to the "*creation of a climate resilient County*", the "*creation of a compact and connected County*" and the "*creation of an inclusive and healthy County*". We highlight the positive alignment of the Council's draft strategic outcomes with the LDA's remit to deliver significant housing growth, enable an affordable housing sector in Ireland and realise compact growth which promotes modal shift towards healthy, active and sustainable mobility.

Further to this, we note the Housing Target for the draft Core Strategy, which based on the RSES, sets out a requirement for the delivery of an additional 20,669 residential units during the Plan period (up to the year 2028). In the *Residential Development Capacity Audit* (Table 2.8, page 30), the draft Core Strategy highlights the significant role that 'Tier 1'¹ lands will play in the realisation of the County's housing targets. We therefore highlight the role that Tier 1 sites such as the Central Mental Hospital can play in the delivery of the significant quantum of housing required to meet the Core Strategy Housing Target, in line with the projected growth contained within the RSES and NPF.

¹ Tier 1 lands are serviced, and in general, part of or contiguous to the built-up footprint of an area (Section 2.3.7.2, Chapter 2, page 30 of Draft Development Plan).

2.6 Part V and Affordable Housing

The proposed development will be an 100% affordable housing scheme. 20% of the units will be provided in line with Part V of the *Planning and Development Act 2000* (as amended) with the remaining 80% delivered as affordable housing under the *Land Development Agency Act 2021*.

We therefore confirm that the proposed development is subject to the requirements of the Part V of the *Planning and Development Act 2000* (as amended). 196 no. units, as agreed with DLRCC, will be provided as Part V units.

A letter from Dún Laoghaire–Rathdown County Council, dated 21st March 2022, is enclosed with this application and notes the engagement of the Applicant with regard to Part V requirements and the approximate costs provided to DLRCC (see Appendix A of the Report).

2.7 Pre-Application Consultation

2.7.1 Consultation with An Bord Pleanála

Following submission of the Section 5 Pre-Application Consultation to the Board, a tripartite meeting was held which was attended by representatives from the Applicant team, Dún Laoghaire Rathdown County Council and An Bord Pleanála. An Bord Pleanála subsequently issued their Notice of Pre-Application Consultation Opinion in October 2021.

The discussions and following Opinion from the Board (which is addressed in detail in the *Response to An Bord Pleanála's Opinion*, prepared by Tom Phillips + Associates) resulted in a number of changes to the scheme, including a revised development strategy. Refer to the enclosed *Response to An Bord Pleanála's Opinion* for full details.

2.7.2 Consultation with Dún Laoghaire Rathdown County Council

Significant pre-application consultation has taken place with Dún Laoghaire Rathdown County Council (DLRCC). In the first instance, 4 no. Masterplan focused meetings were held, followed by 2 no. SHD specific S247 pre-planning meetings. The minutes of these meetings are appended to the SHD Planning Application Form as Appendix B.

The meeting dates are listed below:

- Masterplan Meeting No. 1 – 1st October 2020;
- Masterplan Meeting No. 2 – 30th October 2020;
- Masterplan Meeting No. 3 – 20th November 2021;
- Masterplan Meeting No. 4 – 15th January 2021;
- SHD S247 Pre-Planning Meeting No. 1 – 26th February 2021;
- SHD S247 Pre-Planning Meeting No. 2 – 29th April 2021.

Throughout the pre-application consultation process with DLRCC, discussions were undertaken with the following Council departments:

- Planning
- Conservation

- Roads and Transportation
- Parks and Landscaping
- Drainage

DLRCC were copied to the Applicant's *Section 5 Pre-Application Consultation Request* which comprised full details of the pre-application scheme. In line with the SHD process, DLRCC issued their Chief Executive's report which, pursuant to Section 6(4)(b) of the relevant SHD legislation, provided their opinion in respect of the SHD pre-application scheme. A full response to the points raised within the Chief Executive's report is located at Appendix B of the *Response to An Bord Pleanála's Opinion*, prepared by Tom Phillips + Associates.

Following the tripartite meeting, the Applicant sought to further engage with DLRCC Planning in respect to the updates to the site-wide Masterplan. Unfortunately, DLRCC Planning were unable to facilitate further engagement, in line with their interpretation of the SHD process in the context of the *Planning and Development Act 2000 (as amended)*, and the *Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended)*.

We note that further engagement took place between the project engineers and the DLRCC Drainage Department after the tripartite meeting. DLRCC Transportation were also present at the meeting towards the Applicant and the National Transport Authority (NTA) which is further detailed below.

2.7.3 Consultation with Irish Water

Consultation was first undertaken with Irish Water in the form of a pre-connection enquiry back in April 2020 as the Masterplan proposal was emerging to ensure sufficient capacity in the system. It was confirmed that subject to further details and conditions, the proposed connection to Irish Water network(s) to provide for the proposal could be facilitated.

Subsequently, following discussions with Irish Water, a new Pre-Connection Enquiry was made by Barrett Mahony Consulting Engineers (BMCE) in respect of the pre-application scheme. In September 2021, Irish Water confirmed that the proposed water and wastewater connections from the development to their networks were feasible, subject to implementation of site-specific comments. This detailed in the Confirmation of Feasibility letter from Irish Water enclosed as Appendix 5 of the *Infrastructure Report* prepared by BMCE.

In summary the project works associated with the Irish Water comments are as follows:

1. Water: An upgrade of the existing water main on the Dundrum Road approximately 720metres in length will be required to facilitate the development.
2. Wastewater: A pumping station will be provided on site to limit the outflow from the site to the combined sewer in the Dundrum Road in front of the development.
3. Surface Water: All surface water (rainwater) collected on site will be discharged to a separate system within the site which in turn will discharge to a surface water sewer on St. Columbanus Road close to the existing entrance off the Dundrum Road.

Further to this, a design submission was made to Irish Water on the basis of the final proposal. On 3rd March 2022, Irish Water confirmed that it has no objection to the proposals. The Design Acceptance letter is appended to the *Infrastructure Report* prepared by BMCE.



2.7.4 Consultation the National Transport Authority (NTA)

Further pre-consultation engagement was undertaken with the NTA which comprised a meeting, held on 14th January 2022, between the Applicant team, the NTA and DLRC Transportation Department. The purpose of the meeting was to discuss the changes that had occurred to the scheme between the pre-application stage and final SHD proposal and to ensure that the overall proposed development was consistent with the transport planning for the area.

2.8 Public Consultation

The LDA launched an extensive Community and Stakeholder and Engagement process in September 2020 which included leaflet distribution, information gathering through surveys, virtual consultation rooms, a project website, webinars and email correspondence.

The process is summarised in the enclosed *Report on Stakeholder and Community Engagement*.

3.0 PLANNING HISTORY

3.1 Overview of Planning History

We conducted a planning history search of the site using Dún Laoghaire Rathdown County Council's online planning history search facility and that of An Bord Pleanála, in order to establish the planning history of the subject site and of similar sites in the vicinity.

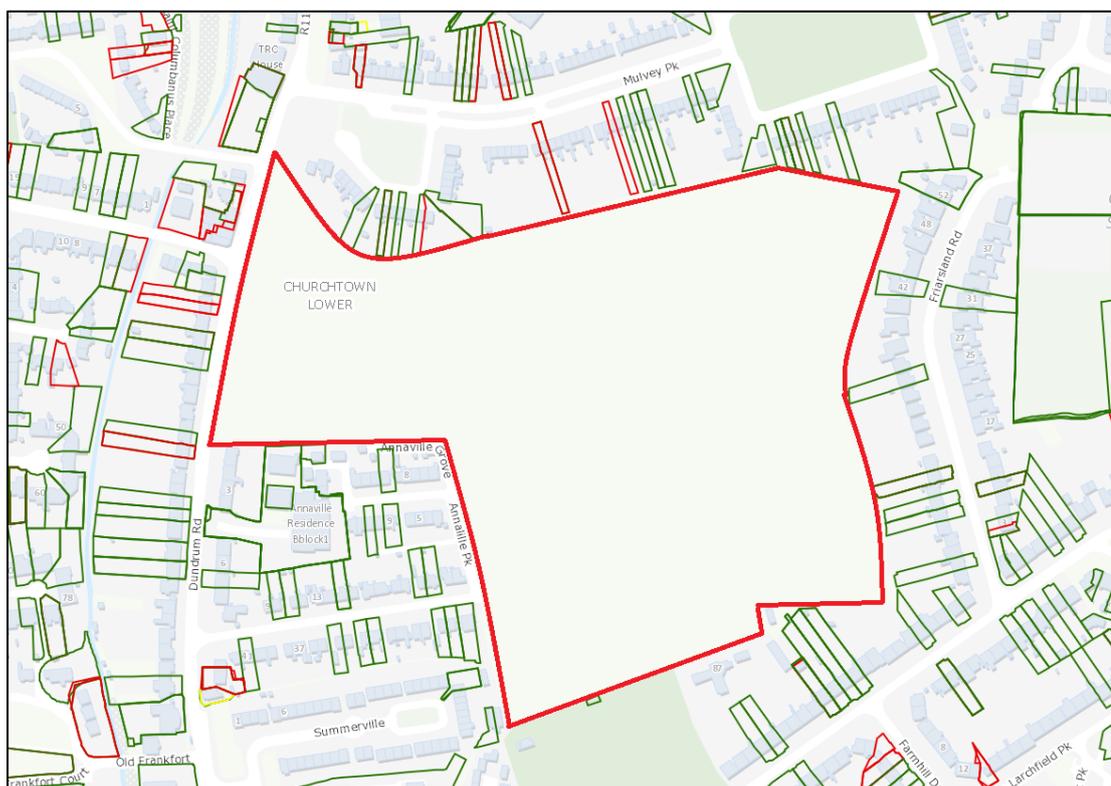


Figure 3.1: Extract from Dun Laoghaire-Rathdown County Council Planning Map Search.

We note that there are no previous planning applications within the application site. We further note that the Main Hospital Buildings are pre-1963.

However, there are many applications for small scale residential development (i.e. residential extensions) which border the subject site. We have reviewed these applications but have not elaborated given their scale and nature.

3.2 Surrounding Relevant Development Projects

As outlined in Section 2.3 of this Report, the enclosed EIAR includes a detailed and robust cumulative impact assessment which has regard to the impact of the proposed SHD in combination with applicable surrounding committed and planned projects.

This has involved a detailed review of all planning history and current/ planned planning applications within a 2km radius of the subject site. The projects considered relevant for the purposes of the EIAR and cumulative assessment are noted below; Chapter 3 of the EIAR provides further details in relation to the below projects.

Table 3.1: Surrounding development permitted projects identified as relevant to the assessment of the proposed project.

DLRCC/ ABP Reg. Ref.	Address	Overview of Development
D16A/0818	Site of approximately 1.23 hectares at Greenacres, Kilmacud Road Upper, Dublin 14	Planning permission granted on 11 th September 2017 for 120 no. apartments.
ABP31013821	Mount Saint Mary's and Saint Joseph's, Dundrum Road, Dundrum, Dublin 14	Planning permission granted on 25 th August 2021 for a SHD for 231 no. units.
D19A/0162	Former Shell Garage, Roebuck Road, Clonskeagh, Dublin 14	Planning permission granted on 8 th August 2019 for a 43 no. residential units.
ABP30835320	The car sales premises currently known as Vector Motors (formerly known as Victor Motors), Goatstown Road, Dublin 14, D14FD23	Planning permission granted on 3 rd February 2021 for a SHD (Student accommodation for 239 no. bed spaces).
D20A/0328	University College Dublin, Belfield, Dublin 4	Planning permission granted on 21 st January 2021 for an extension to the existing car park to provide 239 no. additional car parking spaces, resulting in a total permanent surface car park comprising 300 no. car-parking spaces and modifications to Athletics Track development permitted under Dun Laoghaire Rathdown County Council Reg. Ref. D19A/0001, to omit 185 no. permitted temporary car parking spaces, resulting in a total of 70 no. temporary car parking spaces being delivered as part of the permitted Athletics track development.
ABP30943021	2.12 ha at Our Lady's Grove, Goatstown Road, Dublin 14	Planning permission granted on 3 rd June 2021 for a SHD (student accommodation for 698 no. bed spaces).
ABP31128721	c.0.9ha at No. 97A Highfield Park (D14P710), and No. 1 Frankfort Castle (D14 HY03), No. 2 Frankfort Castle (D14DE72) and Frankfort Lodge (D14C9P2), Old Frankfort, Dublin 14	Planning permission granted on 20 th December 2021 for a SHD for 115 no. apartments.



The below projects are planned projects that are at various stages of the planning process. The key distinction from the projects listed above is that they do not have planning permission at the time of writing. Whilst development without planning permission would not usually form part of the planning history considerations for a site, the below planned projects are considered relevant for the purposes of the EIAR. Refer to Chapter 3 of the EIAR for further details.

In this regard, we further note that planning permission may have been granted in relation to any of the below planned/ undetermined schemes at the point at which An Bord Pleanála assess the proposed development. We do however note that the Board will therefore be in a position to take account of such projects as part of its assessment process, assisted by the assessment provided within the EIAR in respect of the below projects.

Table 3.2: Surrounding development planned projects identified as relevant to the assessment of the proposed development.

DLRCC/ ABP Reg. Ref.	Address	Overview of Development
ABP31182621	Lands at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.	An application has been submitted for an SHD (an amendment to the permitted Phase 2 scheme) lodged on 1 st Nov 2021 with ABP, with the decision due on 28 th Feb 2022 for 227 no. units (134 no. additional units from permitted SHD). (At the time of writing, ABP had confirmed a delay surrounding the determination of this application)
ABP312935	Sommerville House, Dundrum Road, Dublin 14.	An application has been submitted for an SHD, lodged on 7 th March 2022 with ABP, with the decision due on 27 th June 2022 (111 no. units)
TC06D.311553	Old Dundrum Shopping Centre and Other Properties, Main Street, Dundrum, Dublin 14.	SHD Pre-Application Consultation Request lodged with ABP. ABP feedback provided on 14 th Jan 2022 in respect of 884 no. apartments.
N/A	Lands at Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14	Second component of the site-wide Masterplan for the subject lands. Pre-application engagement commenced with DLRCC. Planning application due to be lodged with DLRCC when the SHD (the proposed development) has been decided. This future proposal is further detailed below: 3,540 sq m demolition; 71 no. residential units; 5,566 sq m non-residential floorspace and 60 no. car parking spaces.

3.2.1 Details of Future Planning Application at the Subject Lands

This section provides further detail in relation to the future planning application which will be submitted by the Applicant to Dún Laoghaire-Rathdown County Council under Section 34 of the *Planning and Development Act 2000* (as amended) once the proposed SHD has been decided. This proposal relates to the Central Mental Hospital lands and reflects the second component of the delivery of the site-wide Masterplan for the lands which is described in detail across this submission.

The proposed development strategy in respect of the delivery of the site-wide Masterplan is covered in depth in Section 1.2 of this Report. The compatible, yet standalone, nature of the two relevant planning proposals is further detailed.

For context and for the purposes of the cumulative impact assessment undertaken within the EIAR, an overview of the Section 34 proposal is set out below, including an extract from the draft Site Plan for the Section 34 application showing the red line boundary and site layout.



Figure 3.8: Extract from the draft Site Plan prepared by Reddy A+U for the Section 34 proposal at the Central Mental Hospital lands.

At the time of writing, it is envisaged that the future Section 34 proposal will comprise 71 no. residential units and 5,536 sq m of non-residential floorspace:

- 3,101 sq m of demolition, including:
 - Outbuildings and ancillary structures to rear of Main Hospital Building;

- Eastern wing of Main Hospital Building (later addition to building);
 - Chimney structure;
 - Structures adjacent to farm buildings.
- Change of use and adaptation of the following existing buildings:
 - Main Hospital (5,266 sq m) – Enterprise Centre
 - Chapel (107 sq m) – Community Use
 - Infirmary (158 sq m) – Community/ Enterprise Use
 - Coach House (35 sq m) – Storage
 - Farm Buildings (246 sq m) – Residential
 - Workshops (151 sq m) – Residential
 - New residential buildings:
 - Block 01 (1,111 sq m (incl. farm buildings) – 12 no. residential units
 - Block 11 (3,528 sq m) – 36 no. residential units
 - Block 12 (2,133 sq m) (incl. workshops) – 20 no. residential units
 - 62 no. car parking spaces.

An extract from the draft Schedule of Accommodation, prepared by Reddy A+U, for the Section 34 proposal is provided below.

Block	Apartments					Duplex Apartments		Houses		Total	Application
	Studio	1-Bed	2-Bed (3P)	2-Bed	3-Bed	2-Bed (D)	3-Bed (D)	House (3-Bed)	House (4-Bed)		
Block 01	1	1		3				7		12	S34
Block 11		18	7	4	1				9	39	S34
Block 12		2		3			5	4	6	20	S34
Total	1	21	7	10	1		5	11	15	71	
%	1%	30%	10%	14%	1%		7%	15%	21%		

Figure 3.9: Extract from draft Schedule of Accommodation for the future Section 34 proposal, prepared by Reddy A+U.

It should be noted that the Applicant intends to continue pre-application engagement with Dún Laoghaire-Rathdown County Council in respect of the Section 34 proposal before the scheme is fully finalised. This is due to the outstanding survey work that that is required to be undertaken in respect of the internals of the existing buildings to better inform proposals and assessments of potential impact (which has been delayed due to restricted access to the buildings arising from a delayed vacation of the HSE and service users). Furthermore, given that the submission of this application will follow the determination of the proposed SHD project, it is possible, should planning permission be granted, that the Section 34 proposal will require amendment to respond to any planning conditions imposed in respect of the SHD scheme.

4.0 THE PROPOSED STRATEGIC HOUSING DEVELOPMENT

4.1 Description of Development (as per Statutory Notices)

The Land Development Agency intend to apply to An Bord Pleanála (the Board) for a 10 year permission for a Strategic Housing Development, with a total application site area of c.9.6 ha, on lands at the Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14. The subject site is in the immediate setting and curtilage of a number of proposed protected structures, namely the 'Asylum' (RPS No. 2072), the 'Catholic Chapel' (RPS No. 2071) and the 'Hospital Building' (RPS No. 2073).

The development will consist of the demolition of existing structures associated with the existing use (3,736 sq m), including:

- Single storey former swimming pool / sports hall and admissions unit (2,750 sq m);
- Two storey redbrick building (305 sq m);
- Single storey ancillary and temporary structures including portacabins (677 sq m);
- Removal of existing internal sub-divisions/ fencing, including removal of security fence at Dundrum Road entrance;
- Demolition of section of porch and glazed screens at Gate Lodge building (4 sq m);
- Removal of walls adjacent to Main Hospital Building;
- Alterations and removal of section of wall to Walled Garden.

The development will also consist of alterations and partial demolition of the perimeter wall, including:

- Alterations and removal of section of perimeter wall adjacent to Rosemount Green (south);
- Formation of a new opening in perimeter wall at Annville Grove to provide a pedestrian and cyclist access;
- Alterations and removal of sections of wall adjacent to Dundrum Road (including removal of existing gates and entrance canopy), including reduction in height of section, widening of existing vehicular access, provision of a new vehicular, cyclist and pedestrian access;
- Alterations and removal of section of perimeter wall adjacent to Mulvey Park to provide a pedestrian and cyclist access.

The development with a total gross floor area of c. 106,770 sq m (c. 106,692 sq m excluding retained existing buildings), will consist of 977 no. residential units comprising:

- 940 no. apartments (consisting of 53 no. studio units; 423 no. one bedroom units; 37 no. two bedroom (3 person) units; 317 no. two bedroom (4 person) units; and 110 no. three bedroom units) arranged in 9 blocks (Blocks 02-10) ranging between 2 and 6 storeys in height (with a lower ground floor to Block 03 and Block 10, resulting in part 7 storey), together with private (balconies and private terraces) and communal amenity open space provision (including courtyards and roof gardens) and ancillary residential facilities;
- 17 no. duplex apartments (consisting of 3 no. two bedroom units and 14 no. three bedrooms units located at Blocks 02, 08 and 09), together with private balconies and terraces.

- 20 no. two and three storey houses (consisting of 7 no. three bedroom units and 13 no. four bedroom units) and private rear gardens located at Blocks 02, 08 and 09).

The development will also consist of 3,889 sq m of non-residential uses, comprising:

- Change of use and renovation of existing single storey Gate Lodge building (reception/staff area) to provide a café unit (78 sq m);
- 1 no restaurant unit (307 sq m) located at ground floor level at Block 03;
- 6 no. retail units (1,112 sq m) located at ground floor level at Blocks 03 and 07;
- 1 no. medical unit (245 sq m) located at ground floor level at Block 02;
- A new childcare facility (463 sq m) and associated outdoor play area located at ground floor level at Block 10; and
- A new community centre facility, including a multi-purpose hall, changing rooms, meeting rooms, storage and associated facilities (1,684 sq m) located at ground and first floor level at Block 06.

Vehicular access to the site will be from the existing access off Dundrum Road, as revised, and from a new access also off Dundrum Road to the south of the existing access.

The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, wetland feature, part-basement, car parking (547 no. spaces in total, including car sharing and accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections (including connection into existing surface water sewer in St. Columbanus Road); ducting; plant (including external plant for district heating and pumping station); waste management provision; SuDS measures (including green roofs); attenuation tanks; sustainability measures (including solar panels); signage; public lighting; any making good works to perimeter wall and all site development and excavation works above and below ground.

4.2 Development Statistics

Table 4.1: Development Statistics for the Proposed SHD

Development Statistic	Proposed Development
Site Area	9.6 ha
Net (Residential) Site Area (excluding public open space and Gatelodge*)	6.54 ha
No. of Residential Units	977 (957 no. apartments (including 17 no. duplex units) and 20 no. houses)
Non-Residential Floorspace	3,889 sq m
Gross Residential Density	102 units per hectare
Net Residential Density	150 units per hectare
Plot Ratio	1.11
Site Coverage	32% (including basements)
Height	2 – 6 storeys (with 7 storey elements at Block 03 and 10 due to lower ground floor)
Car Parking	547 no. spaces (489 no. residential spaces (0.5 spaces per unit) and 58 no. non-residential and visitor) 70 no. Motorbike Spaces (49 no. residential spaces and 21 no. spaces). 12 no. Car Club spaces; 15 no. Travel Club

*Refer to Section 5.4 for detail on net site area and density calculations.

4.3 Overview of Proposed Development

977 NO. RESIDENTIAL UNITS

The proposed development will deliver 977 no. residential units arranged in 9 no. blocks (Blocks 02-10) ranging between 2 and 6 storeys in height (with 7 storey elements at Block 03 and 10 due to lower ground floor).

The proposed scheme wide housing mix is as follows:

Table 4.2: Proposed scheme wide unit mix.

	Apartments	Duplexes	Houses	Total	
Studio	53			53 (5.4%)	
1 bed	423			423 (43.3%)	
2 bed (3 person)	37			357 (36.5%)	
2 bed	317	3			
3 bed	110	14	7	131 (13.4%)	144 (14.7%)
4 bed			13	13 (1.3%)	
	940	17	20	977	

The proposed unit mix pertaining to the apartment component development is as follows:

Table 4.3: Proposed apartment development unit mix.

	Apartments	Duplexes	Total	
Studio	53		53 (5.5%)	
1 bed	423		423 (44%)	
2 bed (3 person)	37		357 (37.3%)	
2 bed	317	3		
3 bed	110	14	124 (12.9%)	124 (12.9%)
4 bed			0	
	940	17	957	

The proposed residential units will be arranged as follows:

Block 02

Block 02 is located within the north-eastern part of the site, adjacent to the Main Hospital Building and consists of a new apartment block with a central podium space. The podium space comprises a landscaped communal courtyard with parking below. The height of Block 02 ranges between 2 and 6 storeys in height, with a half basement. The building has a gross floor area of 13,640 sq m and comprises 134 no. residential units, including:

- 134 no. apartments (4 no. studio units, 68 no. 1 bed units, 8 no. 2 bed 3 person units and 44 no. 2 bed 4 person units);
- 3 no. duplex apartments (3 no. 2 bed units); and
- 7 no. houses (7 no. 3 bed units)

The proposed medical floorspace (245 sq m) is located within Block 02.

Block 03

Block 03 is located towards the centre of the site, to the west of the Walled Garden. The building ranges between 4 and 6 storeys in height with half-basement (resulting in 7 storeys of stacked apartments in one location) and is arranged around a central podium which provides a landscaped communal courtyard with car parking below.

The building has a gross floor area of 16,881 sq m and comprises 161 no. residential units, including:

- 161 no. apartments (18 no. studio units, 68 no. 1 bed units, 20 no. 2 bed 3 person units, 55 no. 2 bed 4 person units and 10 no. 3 bed units)

Proposed retail units and a restaurant unit are located at the ground floor of Block 03.

Block 04

Block 04 is located in the far south eastern corner of the site and is to the south of the Walled Garden. It is arranged around a central podium comprising a communal landscaped courtyard and car parking below and ranges between 4 and 6 storeys in height.

The building has a gross floor area of 11,689 sq m and comprises 104 no. apartments, including:

- 104 no. apartments (10 no. studio units, 58 no. 1 bed units, 8 no. 2 bed 3 person units, 32 no. 2 bed 4 person units and 12 no. 3 bed units).

Block 05

Block 05 is located in the centre of the southern part of the site and is arranged around a central podium comprising a communal landscaped courtyard above car parking. It ranges between 4 and 6 storeys in height.

The building has a gross floor area of 11,489 sq m and comprises 118 no. residential units, including:

- 118 no. apartments (5 no. studio units, 67 no. 1 bed units, 40 no. 2 bed 4 person units and 6 no. 3 bed units)

Block 06

Block 06 is located in the south western corner of the site and ranges between 2 and 4 storeys in height. The building comprises two landscaped roof gardens which are accessed from the residential cores. At ground and first floor level, the building includes community facilities consisting of a multipurpose hall, community rooms and sports changing facilities (1,684 sq m).

The building has a gross floor area of 5,960 sq m and comprises 43 no. residential units, including:

- 43 no. apartments (7 no. studio units, 21 no. 1 bed units, 5 no. 2 bed 4 persons and 3 bed units).

Block 07

Block 07 is located in the centre part of the site, adjacent to the proposed plaza. The building ranges between 4 and 6 storeys in height and is arranged around a central podium comprising a landscaped communal courtyard and car parking below.

The building has a gross floor area of 23,596 sq m and comprises 211 no. residential units, including:

- 211 no. apartments (82 no. 1 bed units, 1 no. 2 bed 3 person units, 101 no. 2 bed 4 person units and 27 no. 3 bed units)

The building also comprises retail floorspace (810 sq m) at ground floor level, arranged in 4 no. units.

Block 08

Block 08 is located along the western site boundary, adjacent to Annville Park. The building heights range between 2 and 3 storeys and comprises a mix of unit type. External residential

amenity is provided by way of private rear gardens, in addition to balconies and terraces, depending on unit type.

Block 08 has a gross residential area of 2,756 sq m and comprises 25 no. residential units, including:

- 10 no. apartments (9 no. 1 bed units and 1 no. 2 bed 4 person units)
- 8 no. duplex units (8 no. 3 bed units)
- 7 no. houses (7 no. 4 bed units)

Block 09

Block 09 is located in the north western corner of the site, adjacent to the boundary with Annaville Grove and comprises primarily 3 storey housing with some apartments and duplex units close to the proposed new Dundrum Road entrance. External residential amenity is provided by way of private rear gardens, in addition to balconies and terraces, depending on unit type.

Block 09 has a gross residential area of 2,612 sq m and comprises 23 no. residential units, including:

- 11 no. apartments (6 no. 1 bed units, 2 no. 2 bed 4 person units and 3 no. 3 bed units)
- 6 no. duplex units (6 no. 3 bed units)
- 6 no. houses (6 no. 3 bed units)

Block 10

Block 10 is located on the western side of the site, adjacent to the boundary with Dundrum Road. The buildings are arranged around a central podium comprising a communal landscaped courtyard and car parking below and range between 4 and 6 storeys in height with a half-basement resulting in 7 storeys of stacked apartments in one location.

Block 10 has a gross floor area of 17,241 sq m and comprises 158 no. residential units, including:

- 158 no. apartments (9 no. studio unit, 70 no. 1 bed units, 37 no. 2 bed units and 42 no. 3 bed units)

The building also comprises a childcare facility (463 sq m) with external amenity space at ground floor level.



Figure 4.1: Extract from Reddy Architecture and Urbanism's *Architectural Design Report* showing the proposed SHD site layout.

3,889 SQ M OF NON-RESIDENTIAL FLOORSPACE

The proposed development will deliver a varied non-residential provision which will be integrated into the proposed residential blocks (mainly at ground floor level) and within the existing Gate Lodge.

The proposed non-residential uses include a childcare facility (463 sq m), a medical centre (245 sq m), a restaurant (307 sq m), a café (78 sq m), 6 no. retail/ café units (1,112 sq m) and a community facility (1,684 sq m). The new community centre facility includes a multi-purpose hall changing rooms and meetings rooms.

The proposed non-residential uses will serve both the residents of the proposed development and the existing community.

Table 4.4: Proposed apartment development unit mix.

Building	Unit	Area (GIFA)
Gate Lodge	Café	78
Block 02	Medical	245
Block 03	Restaurant	307
Block 03	Retail 01	170
Block 03	Retail 02	132
Block 06	Community	1,684
Block 07	Retail 03	229
Block 07	Retail 04	78
Block 07	Retail 05	78
Block 07	Retail 06	425
Block 10	Creche	463

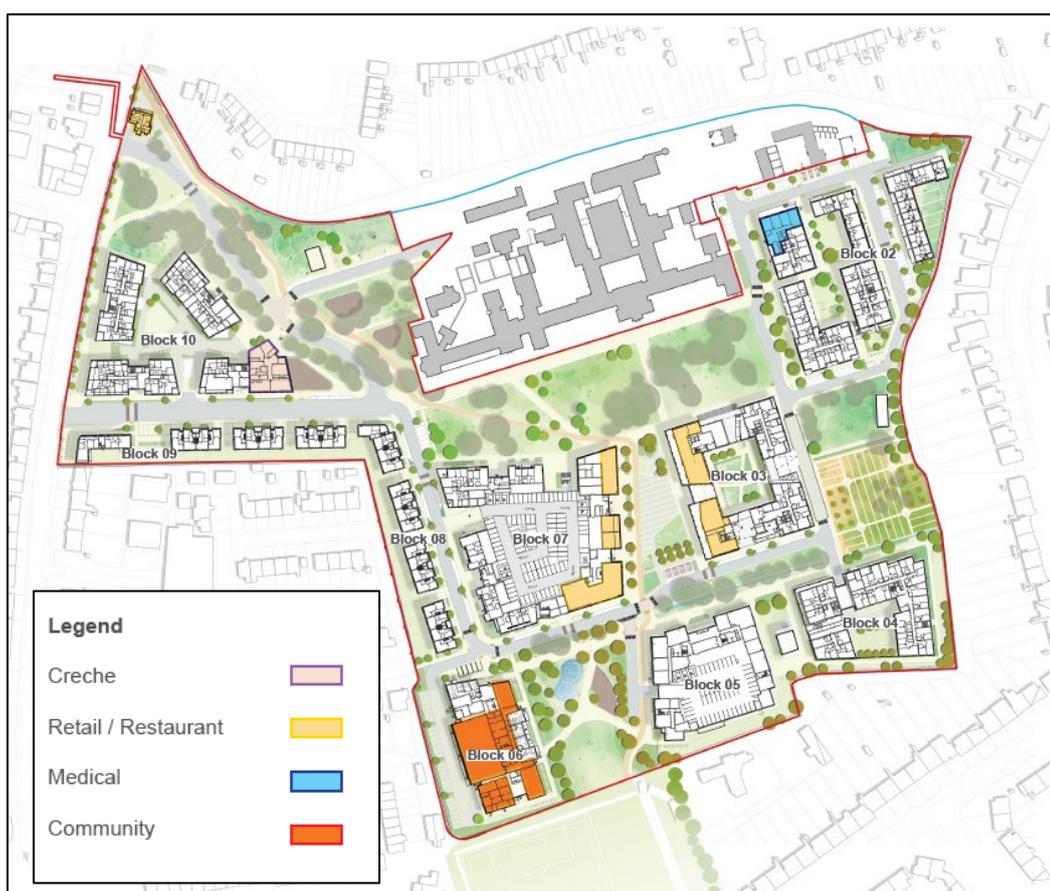


Figure 4.2: Extract from Reddy A + U Architectural Design Report showing the proposed non-residential uses.

c. 30,513.9 SQ M (c. 3.05 HA) OF PUBLIC OPEN SPACE

The proposed development provides a significant quantum of high-quality open space which will be accessible to the public. The proposed public open space provision equates to c. 32% of the total SHD site area. The space has been designed inclusively to serve the existing community as well as the residents of the proposed residential development. The removal of the southern section of the existing perimeter wall will result in a continuation of public open space between the proposed development and the existing Rosemount Green.

The proposed public open space incorporates a number of landscape features, such as the walled garden, mature trees and courtyard and open green space that contribute to the setting of the Hospital Building.



Figure 4.3: Extract from Reddy A + U *Architectural Design Report* showing the proposed public open space provision (c.3.05ha of open space)

PARTIAL DEMOLITION OF PERIMETER WALL AND CREATION OF NEW VEHICULAR, CYCLIST AND PEDESTRIAN ACCESS POINTS

In order to integrate the proposed development into the surrounding area, ensure permeability and improved connectivity between the application site and surrounding streets and achieve a positive interface with the surrounding public realm, the proposed development includes the removal of a number of sections of existing perimeter wall.

This will include the removal of the section of perimeter wall adjacent to Rosemount Green (south) to provide an interface with Rosemount Green and associated pedestrian connectivity. It is proposed that sections of perimeter wall adjacent to both Annville Grove (west) and Mulvey Park (north) are removed to provide pedestrian and cyclist access.

Further to this, it is proposed that sections of the perimeter wall, adjacent to Dundrum Road (west), are removed and/ or altered to provide a new vehicular, cyclist and pedestrian access.

The proposal also includes the widening of the existing Dundrum Road access.

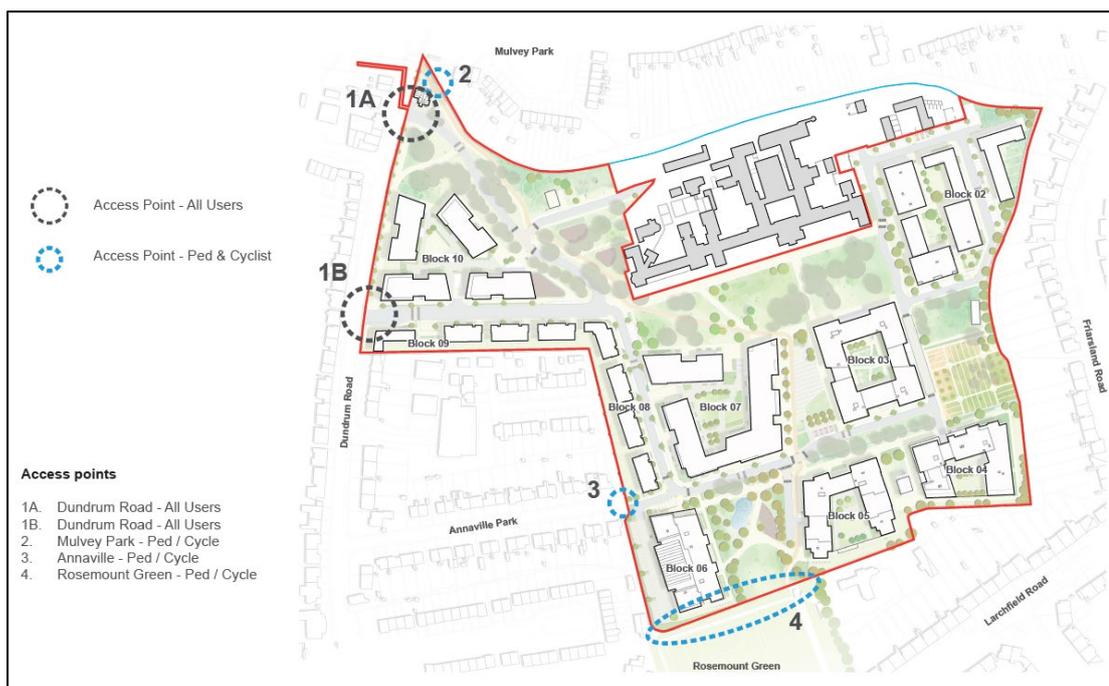


Figure 4.4: Extract from Reddy A + U Architectural Design Report showing proposed access points and breaks in the perimeter wall.

DEMOLITION OF EXISTING STRUCTURES 3,736 SQ M)

The proposed development will include the demolition of a number of existing buildings and structures across the site with a total floorspace of 3,736 sq m. This includes the former swimming pool/ sports hall and admissions unit, a two storey redbrick building, temporary structures including portacabins, an element of the Gate Lodge and the removal of the security fence at Dundrum Road.

ANCILLARY DEVELOPMENT

The proposed development will provide a total of 547 no. car parking spaces, including visitor spaces and spaces that serve the non-residential element of the scheme, accessible spaces and car sharing provision.

In total, the residential car parking will be provided at a ratio of 0.5 space to each residential unit, with additional non-residential and visitor car parking provision.

The proposed development will also provide 2,186 no. bicycle parking spaces (1,670 no. long stay and 516 no. short stay/ visitor).

4.4 Site-Specific Management

This section provides details of site management in respect of the public open space throughout the site, the community facilities proposed and car parking. It also has regard to taking in charge and site safety. This should be read in conjunction with the *Management Strategy Report*, prepared by Savills which specifically addresses the management of the residential units and associated facilities.



In general, we note that the management of the community facilities, as described below, represents the Applicant's strong intentions which will be further development and procured subject to a successful grant of planning permission.

4.4.1 Taking in Charge

A Taking in Charge Plan (Dwg. No. DCD-RAU-02-SW_XX-DR-A-1007) is enclosed with this planning application submission. It is proposed that all internal roads, pathways and public open space within the site boundary are taken in charge by Dún Laoghaire-Rathdown County Council (DLRCC). It is therefore envisaged that DLRCC will manage these spaces in line with Council procedures and protocols, subject to agreement.

4.4.2 Public Open Space

The proposed development includes a significant quantum of public open space. As set out above, it is proposed that this will be taken in charge by DLRCC. On this basis, we confirm that it is not intended that the upkeep of the public open space will fall under the same management regime as the residential units, which will be managed by a management company, and may be subject to service charges etc.

A number of new vehicular, cyclist and pedestrian access points are proposed as part of the development. It is proposed that 24 hour access will be maintained at each access point, enabling 24 hour access for the public (unless restricted for one off events/ maintenance).

In this regard, we further note the new positive interface between the subject lands and Rosemount Green at this location which is facilitated by the proposed removal of a significant section of perimeter wall. The enhanced permeability in this location will provide for an increased movement and fluidity of pedestrians and cyclists between the two public spaces, providing greater opportunities for a range of users and activities.

Although subject to agreement with DLRCC, the taking in charge of the proposed public open space will ensure a seamless integration with Rosemount Green, an existing DLRCC managed public open space.

4.4.3 Site Safety

The public realm throughout the site has been designed to ensure the delivery of a safe place to live, work and visit. In this regard, the following key design principles have been incorporated into the design strategy:

- The maximisation of active frontages which provide activation and natural surveillance to public spaces;
- The provision of non-residential uses at ground floor level, including associated outdoor seating, to activate apartment blocks and adjacent public spaces and provide activity at different times of the day;
- Legible routes, throughout site to ensure safe movement of people, included designated cycle lanes;
- Siting of surface car parking and play spaces in locations where they are overlooked to provide passive surveillance;
- Comprehensive public lighting scheme in respect of all open spaces, roads, car parks and access points;

The *Management Strategy Report*, prepared by Savills, makes reference to a number of security measures that will be considered to supplement the above and ensure the safety of the development.

4.4.4 Community Facilities

The proposed development includes a large community facility at the ground and first floors within Block 06. The new community centre facility includes a multi-purpose hall, changing rooms, meeting rooms, storage and associated facilities with a total floor area of 1,684 sq m. The proposal in this regard has been developed in consultation with DLRCC and local residents (through the public participation process) and has been designed to provide a genuine community facility that can provide for a range of functions and users within the local community, including local sports groups, community groups, events and local businesses (not exhaustive).

The community facility is located at the southernmost part of the site, where the proposed development interfaces with Rosemount Green, an existing public open space. This is considered to provide for an enhanced network of community facilities within the Dundrum area which will be further enhanced with the delivery of the remaining Masterplan proposals. This also aligns with the proposed Specific Local Objective (SLO) 113, contained within the Draft County Development Plan, which applies to both the subject lands and Rosemount Green and states:

“Any integration of/ or connectivity between the Central Mental Hospital lands with the adjoining residential area should include the development of enhanced sporting facilities/ infrastructure for existing and future residents.”

The management of the community facility was discussed during the pre-application stage with DLRCC Planning Department and it is acknowledged that DLRCC are keen to understand how the facility will be managed, especially given its location within the envelope of a residential building. In response to this, the Applicant sought engagement with DLRCC Community and Cultural Development Department with the intention of opening discussion in respect of Council-led management options for the community facility. However, given that the proposal is currently at the planning stage, DLRCC considered it to be a premature stage in the process to reach any agreements or further any discussions in this regard. We confirm that the Applicant is committed to undertake further engagement with DLRCC at the appropriate time in the process.

Nevertheless, as set out above, the facility has been designed to be used for a range of activities by a range of users with the public consultation process providing an opportunity for the Applicant and design team to understand the needs of the local community. Its location ensures accessibility for the local wider community and a positive relationship with the existing community space at Rosemount Green.

The LDA are committed to creating a sustainable, publicly accessible, community centre at this location and will seek further engagement with DLRCC at the appropriate time in the process, subject to a grant of planning permission.



4.3.5 Car Parking

Car parking management is detailed in the *Traffic and Transportation Assessment* (TTA), prepared by ILTP and also discussed within the *Management Strategy Report*, prepared by Savills. Most importantly from a management perspective, we note that the residential car parking spaces will be allocated in line with the management regime for the residential development. As part of this, parking spaces will be allocated at the contract stage in line with the car parking allocation ratios set out in the TTA.

The implementation of the *Mobility Management Plan* (MMP) prepared by ILTP is also a key element of transport management at the site. The MMP provides for the appointment of a Mobility Manager by the management company for the residential development who will promote and monitor the provisions of the MMP.



5.0 KEY PLANNING ISSUES FOR THE CENTRAL MENTAL HOSPITAL LANDS

This section refers to key planning issues pertaining to the Central Mental Hospital lands and should be read in conjunction with the following reports, also prepared by Tom Phillips + Associates:

- *Planning Statement of Consistency*
- *Response to ABP Opinion*
- *Material Contravention Statement*

For the avoidance of doubt, this Planning Report is not intended to provide a further full assessment of the scheme. Instead, it provides supplementary commentary surrounding what we would consider to be the key issues for the redevelopment of the lands. The below assessment is therefore not to be taken as an exhaustive review of the scheme.

5.1 Policy Context

As noted previously, the *Statement of Consistency*, prepared by Tom Phillips + Associates, provides a full commentary on all relevant planning policy and demonstrates the general policy compliant nature of the proposed development. For full details on compliance with the relevant national, regional and local planning policy and guidance documents, refer to the *Statement of Consistency*.

As set out in Section 1.7 of this Report, whilst the *Dún Laoghaire Rathdown County Development Plan 2016-2022* is the current development plan at the time of writing, the planning documentation submitted also covers the eventuality that the new (currently draft) *Dún Laoghaire Rathdown County Development Plan 2022-2028* is in legal effect at the time that An Bord Pleanála determine this planning application. To this end, we confirm that a supplementary version of both the *Statement of Consistency* and *Material Contravention Statement*, which address the compliance of the proposed development with the Draft County Development Plan, also accompany this planning application submission.

5.2 Principle of Development

The proposed development which comprises a residential development with some non-residential supporting facilities is acceptable in principle, having regard to the policy designations pertaining to the lands.

As confirmed in Section 2.5 of this Report, the subject lands benefit from a residential land zoning under the provisions of the *Dún Laoghaire-Rathdown Development Plan 2016-2022* (as varied) - the specific zoning 'Objective A' is "to protect and/or improve residential amenity". As well as residential development being 'permitted in principle', we confirm that the proposed non-residential uses are 'open for consideration' under this zoning objective.

The residential zoning of the lands is maintained under the *Draft Dún Laoghaire-Rathdown Development Plan 2022-2028*. On this basis, we confirm that the proposed development is also supported in principle by the Draft County Development Plan.

5.3 Institutional Lands – ‘INST’ Objective Designation

As outlined throughout this submission, the application site is subject to the INST objective which attracts a number of specific planning policy requirements contained within Section 8.2.3.4 and 2.1.3.5 (which contains Policy RES5: *Institutional Lands*) of the Development Plan.

Section 8.2.3.4 *Additional Accommodation in Existing Built-up Areas* of the Development Plan provides information surrounding the policy requirements for those lands subject to the ‘INST’ objective. In the first instance it states:

“Where no demand for an alternative institutional use is evident or foreseen, the Council may permit alternative uses subject to the area’s zoning objectives and the open character of the lands being retained.” (page 179)

In this regard, we note that the subject lands are state owned and no longer required for institutional use. It is highlighted as a national priority, and part of the LDA’s remit, to optimise state lands to deliver compact urban development and affordable housing. We therefore confirm that the subject lands have been identified, at a national level, to contribute to the fulfilment of the above stated objective and are not required for an alternative institutional use.

Furthermore, the key policy requirements arising from the INST designation are set out below. These are addressed in full in the *Statement of Consistency* prepared by Tom Phillips + associates, but briefly addressed below.

- Provision of a Masterplan for the lands
- Open space requirement of 25%
- Publicly accessible open space
- Account for site’s built heritage and natural assets
- Maintain open character of site
- Consider average net densities of 35-50 units p/ha for Institutional lands (higher densities accepted)

Compliance with the built heritage, natural assets and density requirements are addressed under their respective sections.

5.3.1 Masterplan Requirement

As also noted throughout this submission, the application site’s INST Objective designation and the associated policy requirements under Policy RES5: *Institutional Lands* and Section 8.2.3.4: *Additional Accommodation in Existing Built-up Areas*, contained within the *Dún Laoghaire-Rathdown County Development Plan 2016-2022*, requires the preparation of a Masterplan for the lands.

In line with this requirement, the Applicant team has prepared a Masterplan for the entire Institutional landholding and undertaken extensive pre-application consultation with DLRCC, as required by the relevant policy requirements.

The *Masterplan Document* prepared by Reddy A+U provides an overview of the masterplanning process and the supporting assessments.

The policy requirement set out by Policy RES5, suggests that the Masterplan prepared for the lands should be agreed with the Planning Authority. This has been acknowledged through the significant engagement undertaken with DLRCC during the masterplanning and SHD preparation process.

Whilst the final masterplan complies with the spirit of this policy requirement through very significant consultation, explicit 'agreement' from DLRCC has not been received in respect of the Masterplan proposal and a number of outstanding concerns can be identified within their pre-application correspondence to date. This includes concerns relating to the movement strategy and the overall development strategy. Although we provide detailed rationale and justification in respect of these issues throughout this submission and DLRCC has advised of its agreement in principle with the majority of the principles underpinning the Masterplan, we have identified the lack of clear 'agreement' from DLRCC, in respect of the Masterplan, as a material contravention. This is to address any potential procedural issue that could arise in this regard and is not intended to undermine the merits of the scheme, from an assessment perspective.

Despite this, we maintain that the Masterplan provides for the comprehensive redevelopment of the entire lands. It forms a strong basis for the delivery of high-quality and sustainable redevelopment of the subject lands and conveys the development vision of the LDA embedded within urban design principles for density and sustainable design. It provides a firm basis for the development of an accessible, permeable and environmentally sustainable neighbourhood. It takes into consideration the site's unique location and heritage while balancing considerations of affordability, environmental sustainability, development standards and safety, mobility, conservation and placemaking.

5.3.2 Public Open Space Provision and Open Character of Lands (and Landscape Design)

For Institutional lands, the Development Plan requires a minimum open space provision of 25% of the total site area (or a population-based provision in accordance with Section 8.2.8.2 whichever is the greater). It further requires that the open space provision must be sufficient to maintain the open character of the site.

The proposed design strategy prioritises the provision of open space across the site. The overall provision comprises the following:

Table 5.1: Breakdown of proposed open space provision.

Category of Open Space	Description	Proposed Provision
Public Open Space	Open space that is fully accessible to the public and provides for a range of functions, users and activities.	3.05 ha (31.8%)
General landscaped areas/ open space	All open spaces provided across the site, including landscaped areas and small green areas/ buffer strips adjacent to built form which contribute to the open character of the lands.	3.05 ha (publicly accessible) and an additional 0.36 ha open visual amenity space. 3.41 ha total (35.5%)
Communal Open Space	Provided in the form of roof gardens and landscaped courtyards at podium level for the apartment blocks and open spaces at surface level for the duplex units at Blocks 08 and 09.	0.63 ha in total provision.
Private Amenity Space	Provided in the form of balconies, terraces and rear gardens; accessible only for the occupier of the associated units.	Provided in line with the Apartment Guidelines.

As demonstrated in the table above, the proposed development provides 31.8% public open space, or 35.5% when considered in the context of the additional green space and landscaped areas that is considered to contribute to the overall open character of the lands.

Per person, the proposed development provides 19.09 sq m of open space per person (communal and public), or 15.5 sq m if accounting for the public open space only.

Figure 5.2: Proposed open space provision as a population-based calculation.

Open Space Provision	Calculation Applied	Open Space Provision per Person
Public Open Space only	3.05 ha/ 1,754 people	17.39 sqm per person
Public Open Space + Communal Amenity Space (as required by Section 8.2.8.2)	3.05 ha + 0.63 ha = 3.68 ha 3.68 ha/ 1,754 people	21 sq m per person

From a quantum perspective, the proposed development therefore provides a significant amount of open space for both the future residents and the existing local community in line with the relevant policy requirements.

In this regard, we also note the new positive interface between the subject lands and Rosemount Green at this location which is facilitated by the proposed removal of a significant section of perimeter wall. The enhanced permeability in this location will provide for an increased movement and fluidity of pedestrians and cyclists between the two public spaces, providing greater opportunities for a range of users and activities. The proposed open space,

together with its connectivity with the existing open space to the south, will significantly enhance the green infrastructure network in the local area.

In terms of the nature of the proposed open space, the landscaping strategy identifies a number of key open spaces/ character areas, including: The Parkland, Central Landscape, Central Square, Walled Garden Landscape, Elm Park Stream Corridor and Rosemount Park.

The landscaping strategy comprises a strong hierarchy of public spaces, ranging from open parkland and a central square to eco-corridors and tree lined areas which foster habitat creation to intimate pockets of space which provide opportunity for quiet/ passive activity. From a placemaking perspective, the variation of open spaces within the development is considered to play a key role in the fostering of a sustainable mixed and balanced community with a variety of recreational needs.

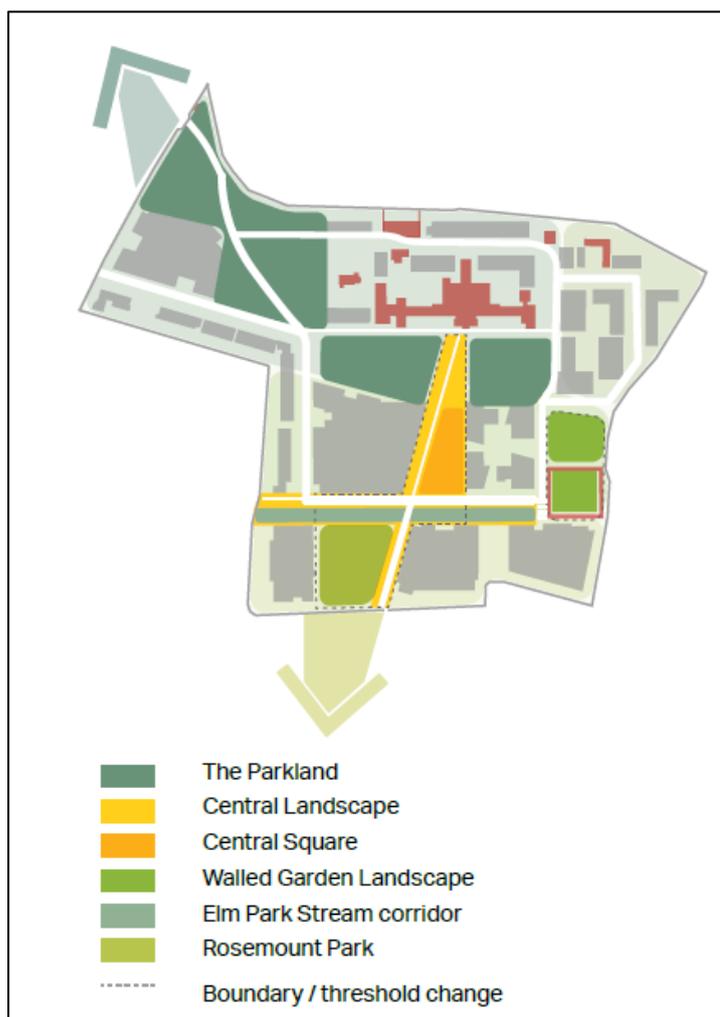


Figure 5.1: Extract from Landscape Architecture and Public Realm Design Report, prepared by Aecom, showing key open areas.

As well as providing significant amenity provision for a range of activities and users, the proposed open space retains the open character of the lands, as well as the special landscape features/ natural assets of the lands, including mature trees, tree lined avenue and the walled garden. As well as fulfilling the policy objective in respect to Institutional lands, this ensures a high-quality response to the redevelopment of the lands in townscape/landscape and visual terms, which is addressed in detail in Chapter 13 of the EIAR.

Further to the above, we note that the proposed development derives from a landscape-led masterplanning exercise which, in consultation with the DLRCC Parks Department, determined the sensitive and compatible arrangement of built form within an existing mature landscape. We highlight the positive feedback communicated from DLRCC Parks throughout the pre-planning process.

As a result, the proposed public open space has been designed to protect the landscape character of the site whilst ensuring the provision of extensive high quality open space. On this basis, in our opinion, the proposed development provides open space of exceptional quality, unlocks a significant quantum of urban greenery that is currently inaccessible to the public and provides a strong contribution to the green infrastructure provision in Dundrum and the surrounding area.

The relevant policy requirements and development standards in respect of open space and amenity space provision are addressed in full in the *Statement of Consistency*.

5.4 Residential Density

The proposed SHD development has a gross residential density of 102 no. units per hectare, based on 977 no. units and a site area of 9.6 ha approximately. The overall Masterplan area (11.3 ha) has a gross residential density of 93 no. units per hectare).

Taking the SHD net site area into account (excluding public open space provision and a standalone non-residential building), the proposed development will provide a net residential density of 150 no. units per hectare (based on a net site area of 6.5 ha).

We note that the above densities have been calculated in accordance with Appendix A of the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities* (2009) which states that a “gross density measure is best applied to estimating overall land areas required for mixed use developments or for Local Area Plans”.

Appendix A of the above guidelines also references ‘net site density’ as a more ‘refined’ estimate of density, primarily to be used where residential uses only are being proposed. These guidelines define net density as follows:

“A net site density measure is a more refined estimate than a gross site density measure and includes only those areas which will be developed for housing and directly associated uses. These will include:

- *access roads within the site;*
- *private garden space;*
- *car parking areas;*
- *incidental open space and landscaping; and*
- *children’s play areas where these are to be provided.*

It therefore excludes:

- *major and local distributor roads;*
- *primary schools, churches, local shopping etc.;*
- *open spaces serving a wider area; and*

- *significant landscape buffer strips.*

A net density is the most commonly used approach in allocating housing land within Local Area Plans and is appropriate for development on infill sites where the boundaries of the site are clearly defined and where only residential uses are proposed. It is also appropriate where phased development is taking place in a major development area (perhaps spanning different plan periods) and individual housing areas have been identified.”

Whilst the proposed development does not comprise residential uses only, the net density has been provided for completeness. Importantly, the net density figure excludes the public open space (3.05 ha) (on the basis that it will ‘serve the wider area’, i.e. beyond the residents themselves) and the footprint of the Gate Lodge, a standalone non-residential building, which will provide 78 sq m of café floorspace. The majority of the non-residential floorspace has not been excluded from the calculation on the basis that it is integrated within the residential blocks.

For ease of reference, the various density calculations are set out again below in Table 5.1:

Table 5.3: Density calculations.

Density Measure	Density (u/ph)
Masterplan Gross	93 units p/ha
SHD Gross	102 units p/ha
SHD Net	150 units p/ha

Referring to the policy objectives surrounding residential density, we reiterate that the Development Plan states that it is Council policy to promote higher residential densities provided that proposals ensure a balance between the reasonable protection of existing residential amenities and the established character of the areas with the need to provide for sustainable residential development. We further note that the Development Plan seeks minimum residential densities of 35 u/ph. For sites with high public transport accessibility, the Draft Development Plan requires higher densities at a minimum of 50 units per hectare.

We further acknowledge the Institutional designation of the subject lands and the specific policy requirements that accompany this designation. Policy RES5 policy notes (as detailed within the *Statement of Consistency*) that where such lands are proposed for redevelopment, it is Council policy to retain the open character and/or recreational amenity of these lands wherever possible, subject to the context of the quantity of provision of existing open space in the general environs. The overriding policies in relation to development on Institutional lands include the preservation of the open character of the lands and the achievement of a sustainable amount of development, while ensuring the essential setting of the lands and the integrity of the main buildings are retained. As set out above, Policy RES5 refers to a residential density range (35-50 units p/ha) which is to be considered in the context of achieving the objective to retain the open character of the lands.

As set out within the *Statement of Consistency*, it is our view that the proposed residential density contributes towards the objective of retaining the open character and recreational amenities of the lands by facilitating the provision of c.32% of the site area as publicly accessible public open space. The concentration of development in certain parts of the site ensures the proposal of appropriate and sustainable density (in line with wider policy

objectives) whilst delivering significant planning gain to the area in the form of public open space which also retains the open character and recreational amenity of the lands.

Notwithstanding the circumstances referred to by Policy RES5 whereby higher densities may be allowed, we highlight that the proposed residential density at the site exceeds the density range set out in relation to Institutional lands (35-50 units p/ha) and is therefore identified as a material contravention which is dealt with in the *Material Contravention Statement*. However, from a design perspective, we consider that the site-specific assessments that support this planning application demonstrate the appropriateness and acceptability of the residential density proposed. In this regard, despite the higher density proposed, the proposed development is considered to deliver an exceptionally high development. These considerations are summarised below:

- The standard of residential accommodation proposed is of a high quality with excellent adherence to the BRE Guidelines from a daylight and sunlight perspective.
- The concentration of development in parts of the site is achieved without giving rise to unacceptable impact upon neighbouring residential amenity. For example, in this regard, the *Daylight and Sunlight – Impact on Neighbouring Properties Report*, prepared by GIA, demonstrates that 99% of applicable neighbouring windows would maintain good levels of daylight with the proposed development in place, when assessed against the Vertical Sky Component (VSC).
- The Landscape/ Townscape Visual Impact Assessment concludes that the proposed development is considered to be appropriately designed to integrate a higher intensity and scale of residential development into the surrounding matrix of predominantly mid-low density residential housing estates. It further states that where impacts are negative, they tend to be in the mid to low range and of a localised nature, whereas effects tend to be more pronounced but positive where the design approach is more readily apparent.

5.5 Design Strategy

The proposed development has been subject to an iterative design process, underpinned by a detailed masterplanning process for the entire lands. As a result, the proposed design strategy responds to a multitude of site-specific characteristics, constraints and opportunities and ensures an optimal design solution for these strategically important lands.

The design strategy seeks to maximise the delivery of residential (and supporting non-residential) development while responding to the specific policy requirements associated with Institutional lands which essentially provides design parameters for the lands.

In our view, the proposed scheme strikes an appropriate balance between the delivery of housing and compact growth, as required by national and regional policy, and a sensitive response to the existing built and natural heritage that characterises the lands.

The masterplanning and design detail are set out in depth in the enclosed *Masterplan Report* and *Architectural Design Report*.



5.5.1 Building Height

The proposed development ranges between 2 and 6 storeys in height, with 7 storeys of stacked apartments in one location at both Blocks 03 and 10, resulting in part 7 storey at those blocks) and has been designed to sensitively respond to the site's heritage buildings, the surrounding neighbouring development and the Institutional objective policy requirement to retain the open character of the lands.

The lower building heights are located towards the edge of the site, contributing to a sensitive transition between the surrounding existing development, which is predominantly two storey in height, and the proposed 6 storey buildings.

We note that a number of changes have occurred in respect of the overall scheme design, including the building height strategy, since the pre-application stage. This was influenced by a number of factors including the sunlight performance of some of the courtyards, the interface between the heritage buildings and proposed built form and the relationship between some elements of the proposed blocks and neighbouring development.

As demonstrated in the *Statement of Consistency*, the proposed development, with a maximum height of 6 storeys (with 7 storey elements at Block 03 and 10 due to lower ground floor), complies in full with SPPR3 of the Building Height guidelines, as well as aligning with Dún Laoghaire-Rathdown's Building Height Strategy through the application of 'upwards modifiers' (albeit addressed in *Material Contravention Statement* due to the potential subjective nature of the application of the upward modifiers under the Building Height Strategy contained in the Development Plan).

Furthermore, from a townscape and visual impact perspective, the enclosed Townscape and Visual Impact Assessment (TVIA) (contained at Chapter 13 of the EIAR) concludes that the proposed development, through the introduction of new mid to large scale buildings, together with the changes to the wider landscape/ open space, would result in a substantial change to the lands in townscape and visual terms. Positively, the TVIA acknowledges the retention of key site features, for example, the main heritage buildings, the walled garden and the mature trees (in their majority). In terms of the relationship of the proposed development with the surrounding area, the TVIA states that the currently completely insular site will be transformed into a modern, outwardly bold, high density residential development. It then goes on to conclude that the townscape impact of the development is deemed to be moderate/ positive.

In conclusion, the proposed building height strategy is considered to reflect a balance a balance between the delivery of significant housing provision, in line with the LDA's remit, and a sensitive response to the Institutional status of the lands and the associated policy requirements. This is further juxtaposed with the presence of both heritage and natural assets which has significantly influenced the site layout and height strategy, including the concentration of built form in particular locations across the site so as to carefully manage the interface between new built form and the heritage buildings.

5.5.2 Relationship with Neighbouring Development

In their current use, the subject lands are largely disconnected from the surrounding area, with the large perimeter walls being the main interface between neighbouring development and the site. The nature of the perimeter wall, the lack of built form within the site and the



extensive open space is considered to result in very little impact, from a residential amenity perspective, upon adjacent neighbouring development. In fact, the subject lands, as existing, are insular and largely unintegrated into the surrounding area. As noted by the TVIA, the proposed development will result in a modern, outwardly bold, high density residential development.

As a result, it is acknowledged that the proposed development will give rise to a change in the way that neighbouring development experiences the subject lands. In terms of potential impact arising, we have given careful consideration to the impact of the development upon neighbouring amenity and sought to minimise the potential for such impacts throughout the masterplanning and SHD design process.

Daylight, Sunlight and Overshadowing

In terms of daylight, sunlight and overshadowing impact upon neighbouring development, the proposed development has undergone detailed daylight, sunlight and overshadowing assessment in respect of its potential impact upon surrounding residential amenity in this regard. Refer to *Daylight and Sunlight – Impact of Neighbouring Properties Report* and the *Transient Overshadowing Assessment* prepared by GIA.

In summary, the assessment has been undertaken strictly in accordance with the BRE Guidelines, as required by the relevant policy provisions. From a daylight perspective, GIA assessed 1099 no. windows across 155 no. properties. When assessed against the Vertical Sky Component (VSC), 99% of the windows satisfy the target values contained within the BRE Guidelines. From a sunlight perspective, GIA tested 641 no. windows that face within 90 degrees due south of the development site in line with the Guidelines. When assessed against Annual Probably Sunlight Hours (APSH), 99% of the windows satisfy the BRE target values.

Furthermore, GIA undertook a Transient Overshadowing Study (TOS) to demonstrate the overshadowing impact of the proposed development on surrounding neighbouring development. Although a qualitative assessment, it is clear from the imagery that any overshadowing to neighbouring properties is “*generally brief and insignificant*”.

We therefore conclude that a detailed and robust assessment has been undertaken in respect of potential impact in relation to daylight and sunlight. We further conclude that it has been demonstrated that the proposed development will not give rise to unacceptable impact upon the receiving environment in this regard. Refer to the *Daylight and Sunlight – Impact of Neighbouring Properties Report* and accompanying appendices for full details of the assessment and results.

Overbearing

Since pre-application stage, the proposed height strategy has been amended which is considered to reduce any perceived potential overbearing impacts associated with the proposed development.

Notwithstanding this, we note that a sense or experience of ‘overbearingness’ is subjective and therefore difficult to quantify for assessment purposes. Nevertheless, in our view, the proposed separation distances and height strategy mitigate concerns in this regard. This is further evidenced by the positive daylight, sunlight and overshadowing assessment in respect

of the impact of the proposed development upon surrounding neighbouring development. The conclusions of the TVIA are also considered to support this.

We further highlight the presence of the perimeter wall at 4-5 metres in height which will remain in situ with the proposed development in place. In our view, the proposed height strategy (which tapers towards the site boundary) together with the retention of the perimeter wall (which will continue to provide a visual boundary) will ensure that neighbouring two storey properties are not immediately adjacent to significantly taller buildings. The siting of increased height towards the centre/ less sensitive locations of the site is considered to provide a sense of visual relief for neighbouring development.

Overlooking

As detailed within the Response to ABP Opinion, since the pre-application stage, a number of amendments have been made to minimise the amount of potential overlooking arising from the proposed development, including alterations to some of the blocks to improve relationship between the proposed development and neighbouring properties at Annville and Dundrum Road. Due to the design changes made and embedded mitigating features such as generous separation distances between the taller buildings within the scheme and neighbouring development, it is not considered that the proposed development will give rise to unacceptable adverse impact in relation to overlooking. Refer to pages 23-25 of the *Architectural Response to ABP Opinion* for a series of illustrative maps and visualisations which demonstrate that the proposed development is acceptable in this regard.

5.6 Built Heritage

The SHD application boundary excludes the proposed protected structures due to the reasons outlined in Section 1.2 of the Report. The proposed development however sits within the immediate setting and curtilage of the proposed protected structures, namely the 'Asylum' (RPS No. 2072), the 'Catholic Chapel' (RPS No. 2071) and the 'Hospital Building' (RPS No. 2073). The below Figure 5.2, an extract from the Draft County Development Plan's interactive mapping, illustrates the extent of proposed protection (shown in yellow).

We note that the Masterplanning exercise, which includes for the redevelopment of the entire Central Mental Hospital lands, ensures a holistic approach which gives careful consideration to the interface between the site's heritage assets, the historic landscape and the proposed new built form. Refer to the *Masterplan Report* for further details.



Figure 5.2: Extract from *Draft Dún Laoghaire Development Plan 2022-2028* showing extent of proposed protected structures at the Central Mental Hospital lands.

Within the wider site boundary, the following heritage features have been identified:

1. The Perimeter Wall
2. The Main Hospital Building complex including ancillary buildings
3. The Gate Lodge
4. Open Paddocks
5. Historic Landscape
6. Walled Garden



Figure 5.3: Extract from Alastair Coey’s Architectural Heritage Assessment contained within Chapter 15 of the EIAR.

Whilst the proposals do not propose direct intervention in respect of the proposed protected structures, the proposal includes works to a number of buildings/ structures that are identified as having heritage value by Alastair Coey Architects in their Architectural Heritage Assessment (Chapter 15 of the EIAR), including the perimeter wall.

The Architectural Heritage Assessment highlights a number of mitigation measures that have been embedded into the design strategy and Masterplan proposal to reduce the potential impacts upon the architectural heritage within the site boundary. This includes the setting of reduced heights within the immediate setting (Block O2) of the Main Hospital Building so that the hospital retains its dominance and the retention of the historic landscape to the immediate south of the Main Hospital Building. The enclosed CGIs

In terms of the perimeter wall, the Assessment notes some potential impacts arising from the removal of substantial sections, but acknowledges the sensitive nature of the proposed interventions, as well as recognising the important role that the removed sections play from a permeability, connectivity and sustainable mobility perspective.

The proposed development also includes works to the Gate Lodge which facilitates a change of use from its existing reception use to a café. The works involve the removal of non-original features and a conservation-led refurbishment which are considered to result in a significantly beneficial impact.

Refer to the following documents for full details surrounding built heritage and assessment of potential impacts:

- EIAR Chapter 15 'Architectural Heritage'
- Gate Lodge Condition Report
- Perimeter Wall Survey Report

In summary, the proposed development will result in a significant degree of change to the Central Mental Hospital lands which inevitably, given the sensitivity of the site, will give rise to impact of varying degrees across the various assets. Nevertheless, and as recognised by the Architectural Heritage Assessment, the proposed design strategy ensures sensitive intervention and ultimately balances the need to protect the heritage assets and the requirement to deliver a significant quantum of affordable housing. In our view, the proposed development results in a positive interface between new and old, and provides a high quality contribution to addressing housing need.

5.7 Residential Development

As set out in relation to the strategic planning context in Section 2.5 of this Report, the proposal seeks the redevelopment of strategically important lands in the context of housing need and delivery. The proposed development will deliver 977 no. units at a net residential density of 150 units per hectare on brownfield, serviced lands which are well-connected to public transport. Therefore, as detailed in the *Statement of Consistency*, the proposed development aligns with national and regional policy objectives and guidelines pertaining to housing delivery, compact growth and sustainable development.

The proposed housing mix is considered to contribute to the delivery of a mixed and balanced community and responds to an existing prevalence of low-density housing in the surrounding area. In alignment with the Apartment Guidelines, the scale and nature of the proposed apartment development is considered appropriate in the context of the site's locational characteristics from a public transport accessibility perspective. In this regard, the classification of the lands as a Central and/ or Accessible Urban location throughout this planning application submission is owed to the proximity of the site to a number of significant employment locations, the Windy Arbour Luas Stop and a range of bus stops/routes serving key destinations.

Importantly, we highlight that the proposed development will deliver an 100% affordable housing scheme, whereby 20% of the units will be provided in line with Part V of the *Planning and Development Act 2000* (as amended) and the remaining 80% will be delivered as affordable housing under the *Land Development Agency Act 2021*. From a housing delivery perspective, this is considered to constitute a significant public benefit.

The scale of the proposed development, particularly in relation to height and density, is considered to be appropriate in design terms as well as from a locational perspective. The development is considered to optimise the delivery of housing from a quantum perspective whilst providing a high standard of residential accommodation. This is demonstrated in detail in the *Housing Quality Assessment* which confirms full compliance with the Apartment Guidelines and Sustainable Housing etc., the quality of residential accommodation provided is further evidenced by the *Internal Daylight Sunlight and Overshadowing Report* which confirms that 91% of the habitable rooms tested across the development comply with the BRE Guidelines for daylight (ADF)

A number of improvements were also made since the pre-application stage to ensure adequate privacy levels were achieved for both future and existing neighbouring occupiers.

As set out in detail above, the open space provision, given its quality and quantity, is considered to contribute to the overall standard of residential accommodation and therefore play a pivotal role in the delivery of successful placemaking.

5.8 Sustainable Mobility

The Applicant, as a Government Agency, is committed to delivering a low carbon development with the emphasis on sustainable travel modes and reduced private car dependency in line with the strategic objectives of the National Planning Framework.

The locational characteristics of the subject site, in the context of public transport accessibility and significant employment locations, is considered to support the provision of reduced car parking and emphasis on sustainable travel.

In addition to the location of the lands, the nature and characteristics of the proposed development is considered to encourage and support the use of sustainable modes of transport and minimise reliance on car use, including through the provision of non-residential local services and facilities, removal of sections of perimeter wall to provide enhanced permeability between site and surrounding area and the internal site layout and proposed pedestrian and cyclist connections.

Full details of the transport proposals and assessment is contained within the *Traffic and Transport Assessment* (TTA). However, an overview of the transport related proposals is provided below.

5.8.1 Pedestrian and Cyclist Connections and Permeability

The proposed development includes a number of new pedestrian and cycle links which provide connection between the subject lands and the surrounding area. Given the current insular nature of the lands, the proposed connectivity results in a significant enhancement to permeability in the local area. In summary, the proposal includes the following new cycle and pedestrian access points:

- Formation of a new opening in perimeter wall at Annville Grove to provide a pedestrian and cyclist access.
- Removal of sections of wall adjacent to Dundrum Road, including the provision of a new vehicular, cyclist and pedestrian access.
- Removal of section of perimeter wall adjacent to Mulvey Park to provide a pedestrian and cyclist access.
- Removal of section of perimeter wall adjacent to Rosemount Green to provide cycle and pedestrian connectivity.

Refer to the *Architectural Design Report* provides an illustrative site plan showing the proposed pedestrian and cycle links.

As set out and further detailed in the *Mobility Management Plan (MMP)*, the provision of the proposed new cycle (and pedestrian) link through the proposed development provides a strategic new link that significantly augments the existing and planned cycle network in the area. It provides new connections for existing communities as well as the new planned community and will promote sustainable travel in the area. In addition, it links with the existing pedestrian/cycle crossing on Dundrum Road and provides access to low volume traffic routes to the north and south of the subject lands. This additional strategic link through the proposed development represents a significant contribution to the local mobility.

From a pedestrian connectivity perspective, ILTP provide an illustrative diagram within their MMP which shows the significant improvement of the pedestrian walking catchment as a result of the proposed links (provided at Figure 5.2 below). This extract shows that with the implementation of the proposed internal infrastructure, the 15-minute walking catchment (shown in blue) would significantly increase to the east and south of the subject lands particularly. This very significant increase in catchment will further promote the use of walk and cycle modes for the new development and importantly benefits the existing community by providing shorter walk and cycle route.

It further illustrates the improved walking catchment in the context of surrounding public transport, including the Luas line and stops and bus stops. The illustrative map demonstrates that the introduction of the proposed pedestrian and cycle access points will improve access to public transport, particularly, bus stops on Goatstown Road.

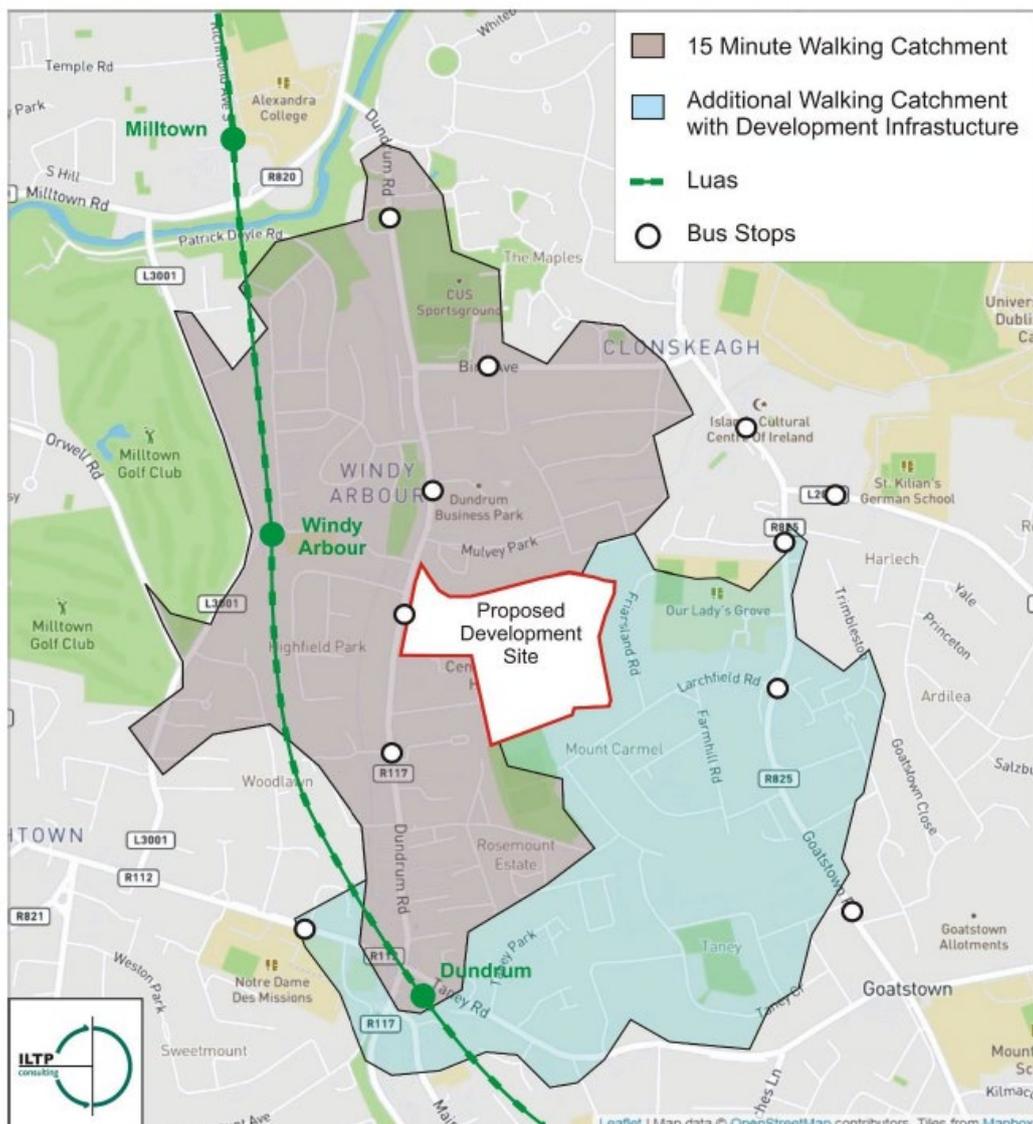


Figure 5.4 Extract from ILTP’s Figure 4.5: Walking Catchments (15 minutes) Without and With Proposed Development

5.8.2 Vehicular Access and Movement Strategy

The development of a movement strategy for the Masterplan proposal has been very carefully considered by the Applicant Team and has been the topic of much discussion with DLRC.

In an earlier iteration of the Masterplan, the Applicant team explored the potential for an access route between the southern boundary of the Central Mental Hospital lands and Larchfield Road to the south-east of the lands, via Rosemount Green (an existing area of open space). This built upon a shared objective between the Applicant and DLRC to enhance connectivity between the subject lands and the surrounding Dundrum area.

Whilst this represented a shared objective, the open space land zoning objective pertaining to Rosemount Green resulted in significant challenge surrounding the proposal and delivery of this route. It was determined, with reference to relevant case law, that the proposal of this route would have the potential to conflict with the open space land zoning objective at Rosemount Green and therefore, significantly conflict with the proposed development from a procedural perspective in the context of the SHD provisions. Further to this, there was

significant objection from neighbouring residents in respect of this route which was voiced during public consultation events.

As a result of this, the current Masterplan proposal does not include the aforementioned vehicular access (as referred to within the S247 minutes) but proposes a second vehicular access onto Dundrum Road. The proposal also seeks to maintain the existing vehicular access point.

The proposed strategy is fully deliverable by the Applicant and achieves a second vehicular access point without giving rise to traffic related issues either within or outside the subject site. We consider that the proposed access strategy in this regard is acceptable for the following reasons:

- The second access will ensure that all site related traffic is not concentrated at one access point.
- It will reduce potential congestion on Dundrum Road that might arise with a single access point.
- It will reduce traffic congestion pedestrian crossing on Dundrum Road.
- It will ensure that vehicular access to the site is maintained should an access be blocked due to an emergency, road maintenance etc.
- Contribute to the creation of filtered permeability through the development and reduce concentration of vehicular traffic.

5.8.3 Reduced Car Parking

The *Statement of Consistency* provides a full assessment of the proposed residential car parking provision against the relevant Development Plan standards and the Apartment Guidelines. Whilst the reduced quantum of car parking proposed is addressed in the *Material Contravention Statement* in respect of the numerical standards, we confirm that the residential car parking aligns with the provisions for reduced car parking contained within both the Development Plan and the Apartment Guidelines.

The proposed development has been designed to minimise reliance on car use and encourage and support the use of sustainable modes of transport. In summary the proposed residential car parking ratio is considered to be both appropriate and acceptable for the following reasons:

- The locational characteristics of the site in the context of public transport, significant employment locations and local services and infrastructure (education retail, leisure etc.);
- When considered against the Apartment Guidelines, the site is considered to be a Central and/or Accessible Urban location and is therefore, deemed to be an appropriate location for higher density apartment development with reduced car parking;
- The specific characteristics of the proposed development which is mixed use in nature, provides local services and facilities, provides significant amenity, including connection into existing public open space;
- The wider characteristics of the Masterplan which includes the delivery of employment floorspace at the site;

- The design of the internal street layout and the provision of cycle and pedestrian connectivity through the site has been designed to promote sustainable travel patterns for both the existing and new community and has resulted in reduced walking times from the site to key destinations such as Dundrum Town Centre;
- The measures contained within the Mobility Management Plan, including Car Club, Travel Club;
- The proposed car parking management strategy which ensures the centralised management of car parking/ allocation to avoid inappropriate overspill into the surrounding network;

Having regard to the factors set out above, we consider that the characteristics of the application site and proposed development lend themselves to reduced car parking provision. We therefore confirm that that proposed parking provision is acceptable in line with the national policy objectives and guidelines relating to sustainable travel modes and reduced dependency on car.

5.9 Landscaping and Natural Assets (including trees)

Further to the discussion surrounding public open space in Section 5.3.2 of this Report, we provide an overview of the landscape proposals below. We note that the proposal is set out in detail in the *Landscape Architecture and Public Realm Design Report* prepared by Aecom.

Firstly, we highlight that the existing landscape at the site, due to its heritage value and overall open character, formed a strong basis for a landscape-led masterplanning process and the site layout as currently proposed. As set out in the Architectural Heritage chapter of the EIAR and the *Landscape Architecture and Public Realm Design Report*, the character of the existing landscape embodies both the historical and current function of the Central Mental Hospital, as a mental health facility whereby the landscape is considered to play an integral role in recovery and rehabilitation.

In addition to responding to the Institutional objective contained within the Development Plan which seeks to ensure that the open character of the lands is maintained, the architectural and landscaping proposals have been designed to respond to the site's history and protect and enhance the associated character.

For example, as noted in the *Landscape Architecture and Public Realm Design Report*:

- The developed landscape will retain and protect existing mature trees onsite (where possible). A central parkland retaining the valuable mature trees on site will provide a key amenity reflecting the historic parkland of past.
- The existing walled garden will be retained and enhanced through the development.
- Existing and historic vistas through the site will be re-established through the design of the open space and architect, providing a sympathetic green framework through the development.
- The landscape planting will contribute to achieving tranquillity and biodiversity.

The wider aims and objectives for the landscape proposal relate to recreation, environment, education, culture and leisure which is considered to be reflected in the key open spaces

proposed across the site (as depicted in Figure 5.3) which provide for a range of functions, activities and users, including:

- Historic Trees
- Central Square
- Community Park
- Central Parkland
- Walled Garden
- Elm Park Eco Corridor

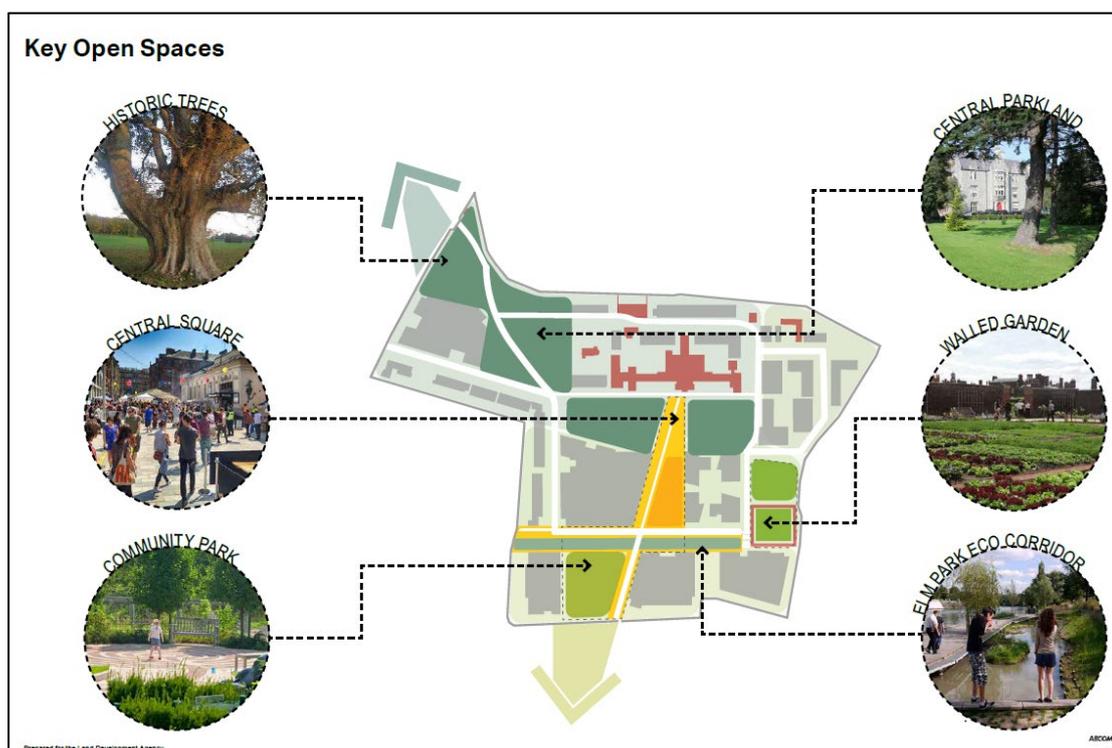


Figure 5.5: Extract from the *Landscape Architecture and Public Realm Design Report* prepared by Aecom, showing the key open spaces proposed.

The *Landscape Architecture and Public Realm Design Report* provides a description of each of the key open spaces that form part of the landscape strategy for the development. It is clear that the proposal provides an appropriate hierarchy of open space which provide for high quality, varied, inclusive and accessible spaces. In our opinion, the nature of the proposed open spaces place the community (new and existing) at the heart of the development while ensuring that the open character of the lands is protected and key natural assets retained, including the walled garden and existing mature trees.

In addition to the delivery of new and varied public open spaces, the proposed development connects into the existing green infrastructure in the surrounding area via Rosemount Green to the south. This new positive interface between the subject lands and Rosemount Green is facilitated by the proposed removal of a significant section of perimeter wall which enhances permeability at this location and provides for an increased movement and fluidity of pedestrians and cyclists between the two public spaces, providing greater opportunities for a range of users and activities. The siting of the proposed community facilities at this location further strengthens the function of the community park as an inclusive and accessible space.

From an ecological perspective, the proposed Elm Park Eco Corridor will provide an important habitat corridor on site which will build upon existing features including semi-mature trees, a drainage ditch and wet grassland. The proposal includes additional planting and increased areas of wetland habitat which has the potential to benefit a wide variety of plant and animal species including bats, frogs, newts and a variety of insects. In addition to this, other habitats that will be created through the open space include:

- Open bonded brickwork within detailing of infrastructure allowing for bat roosting.
- Bird and mammalian nest boxes throughout the open public space.
- Log piles simulate fallen trees and are valuable habitat for mosses, lichens and fungi, as well as many insects through the wetlands and extensive green roofs; and
- Crushed aggregate pathways along secondary pathways allows water to permeate naturally through the soil, without the need for drainage and associated infrastructure.

In this regard, this application is also supported by a *Habitat Management Plan*, prepared by Altemar Ltd., which ensures that the maintenance and enhancement of landscape elements, prevents the introduction of invasive species, maintains biodiversity elements of the core biodiversity habitats, prevents the deterioration of the habitats and monitors the impacts of the habitat management practices.

The proposed development includes an extensive network of SuDS measures which as well as contributing to stormwater management, provides significant enhancements from a biodiversity perspective. The SuDS strategy is depicted in Figure 5.4 below and comprises the following measures:

- Intensive and Extensive Green Roofs
- Integrated Constructed Wetland
- Raingardens/ Bioretention Pits
- Permeable Surfacing
- Swale

Refer to the engineering documents for full details surrounding the SuDS proposals from a drainage and stormwater management perspective.



Figure 5.6: Extract from the *Landscape Architecture and Public Realm Design Report* illustrated the proposed SuDS strategy.

In terms of play provision, the extensive open space network proposed provides for a broad variety of play and play spaces, both formal and informal. There are two designated playgrounds located to the north of the site and in the community park in the south of the site with local play opportunities for residents within the communal podium spaces. There are further informal play opportunities throughout the site.

We therefore conclude that the proposed development is of exceptional quality from a landscaping perspective, both in respect of the quantity of open space provided and the quality of the detailed proposals. From an amenity perspective, the landscaping strategy provides significant benefit to the new and existing community; it will make a significant contribution to the green infrastructure network in Dundrum as well as providing new distinct open spaces that provide for a range of users and activities. The proposed hierarchy of open space ensures characterful spaces that are inclusive and accessible to the wider local community, further enhanced by the provision of increased site permeability in the form of new pedestrian and cyclist links into surrounding lands. The proposed landscape strategy is synonymous to the requirement to maintain the open character of the lands in association with the Institutional objective contained within the Development Plan. As further discussed in Section 5.3.2 of this Report, the significant quantity of public open space proposed, coupled with the integration of the existing historic landscape into the landscape proposals and architectural scheme is considered to protect the open character of the lands and enhance the site's heritage and natural assets. As demonstrated above, the landscaping proposals will also give rise to significant enhancements from a biodiversity perspective, both through the proposed planting specification and the extensive SuDS measures proposed. Lastly, we draw



further attention to the enclosed *Habitats Management Plan* and the discussion surrounding site management in Section 4.4 of this Report which refers to the management regime for the community and amenity facilities which will ensure that the proposed open space will continue to provide a biodiversity rich and accessible and inclusive space for the community.

5.10 Ecology

Section 2.4 of this Report sets out the environmental context for the subject lands, as part of this, we note that a *Natura Impact Statement* (NIS) in support of the Appropriate Assessment Process, is enclosed with the planning application.

In respect of relevant Natura 2000 Sites, the proposed works are not located within a Natura 2000 site but there are a number of such sites within 15 km of the subject site. In this regard, the NIS states the following:

“The subject site is located in close proximity to Dublin Bay, situated 2.8 km from both South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA...There is a direct hydrological connection...from the subject site to the aforementioned Natura 2000 sites via the proposed surface water drainage strategy. It is proposed to separate the surface water drainage strategy for the subject site into three catchments: Catchment A, Catchment B1, and Catchment B2. Surface water drainage from Catchment A will join the existing public surface water network via a manhole connection located to the north-west of the site. This network then outfalls to the River Slang. Surface water drainage from Catchment B1 will, after attenuation, outfall to an existing open channel drain that passes through the subject site. Catchment B2 will, after attenuation, outfall to an existing drainage ditch located just outside of the site. As both the River Slang and the aforementioned open channel drain which leads to the Elm Park stream flow into Dublin Bay, there is a direct hydrological connection to Natura 2000 sites located along this pathway.”

The NIS then goes on to conclude:

“No significant effects are likely from the proposed development, either alone or in combination with any other plans or projects on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites.”

Further to this, a full ecological impact assessment of the proposed development is contained within the Biodiversity Chapter of the EIAR (prepared by Altemar Ltd.), including a detailed assessment of the baseline environment (building upon the survey findings referred to in Section 2.4 of this Report), details of the potential impacts arising from the proposed development and measures required to mitigate that impact.

In terms of conclusions, the Biodiversity Chapter considers the loss of certain biodiversity features on site and the introduction of new buildings and increased human disturbance, in the context of the proposed sensitive landscape strategy which includes biodiversity enhancement measures. An extract from the conclusions of the Biodiversity Chapter is provided below:

“As a result of the loss of certain biodiversity features on site and the introduction of new buildings and increased human disturbance in addition to the implementation of



a sensitive landscaping strategy, with biodiversity enhancement measures it is considered that the overall impact on the ecology of the proposed development will result in a long term minor negative neutral residual impact on the existing ecology of the site and locality overall. This is primarily as a result of the loss of terrestrial habitats on site, supported by the creation of additional terrestrial biodiversity features, mitigation measures and a sensitive lighting strategy.”

Drawing upon the above, we conclude that the proposed development will not give rise to unacceptable impact upon the environment from a biodiversity perspective in the context of site-specific ecology and from an Appropriate Assessment in the context the identified relevant Natura 2000 sites. As set out in relation to the landscape strategy above, we confirm that the proposed development will give rise to enhancements to local biodiversity through habitat creation, including through the introductive of extensive SuDS to the site.

5.11 Archaeology

The planning application is supported by a full archaeological assessment contained at Chapter 14 ‘Cultural Heritage and Archaeology’ of the EIAR, prepared by IAC. This assessment is supported by detailed archaeological survey work, appended to the EIAR as Appendix 14.1 and 14.2. The survey work consisted of geophysical survey work and test trenching which revealed 5 no. areas of archaeological significance, comprising two small enclosures dating to the post-medieval era, a kiln, an isolated pit and a cluster of hearths with postholes.

The report recommended that the area of impact should be preserved by record through full archaeological excavation, together with a number of specific mitigation measures, including the preservation of the archaeological features by record (archaeological excavation) prior to the development going ahead. The EIAR chapter concludes that there would be no significant adverse impacts arising from the development in this regard.

5.12 Engineering

The planning application is supported by a full suite of engineering proposals to serve the proposed development, including extensive SuDS proposals which are further detailed in the *Infrastructure Report* prepared by BMCE, dated March 2022.

In terms of foul water, the proposed foul drainage system will connect to the Irish Water network at the existing 300mm combined sewer on Dundrum Road. We confirm that Irish Water have confirmed capacity in the receiving network, as reflected in the Confirmation of Feasibility letter, dated 23rd September 2021 and appended to the *Infrastructure Report* (Appendix 5).

In terms of proposed watermains, the proposed development will be connected to a new public watermain on Dundrum Road. Irish Water also confirmed capacity in this regard, as detailed in the aforementioned.

Furthermore, the proposed surface water drainage system is designed to comply with the Greater Dublin Strategic Drainage Study (GSDSDS) and other relevant guidelines and codes of practice. For surface water drainage purposes, it is proposed that the development is split into three catchments which will be attenuated separately by means of blue roofs and attenuation tanks which follow approximately the existing site topography and natural drainage routes on site, as summarised below (also see Figure 5.5):

- Catchment A drains into the Slang, via an existing surface water sewer;
- Catchment B drains to the open drainage ditch on site (B1) or just outside the site (B2);

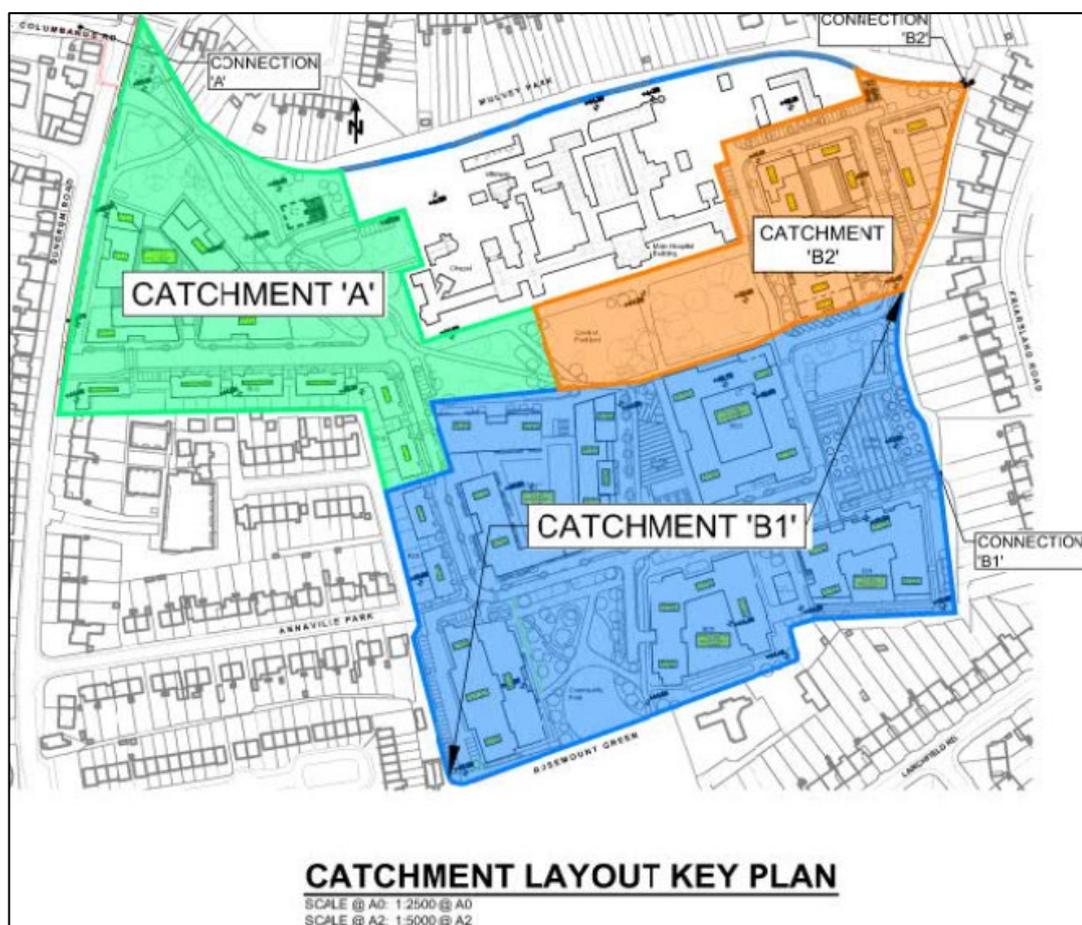


Figure 5.7: Extract from BMCE’s Infrastructure Report showing the proposed catchment Strategy.

As described in the landscape section of this Report, the proposed development includes extensive SuDS proposals which are considered to mitigate flood risk and protect natural water cycle, manage the quality of the runoff to prevent pollution, create and sustain better places for people (amenity) and create and sustain better places for nature (biodiversity). The proposed SuDS measures are considered to deliver significant benefits from a flood risk and sustainability perspective and are described in both the *Infrastructure Report* and the *Landscape Architecture and Public Design Report*.

6.0 CONCLUSION

As described in detail above and within the *Statement of Consistency*, the proposed strategic housing development is considered compliant with local, regional and national policy and guidance.

Further to the above, we provide some key points below which confirms the proposed development's compliance with the relevant policy and guidance and the proper planning and sustainable development of the surrounding area:

- The proposed SHD is underpinned by a site-wide Masterplan which, in line with the requirements of the Development Plan pertaining to Institutional lands, provides for the comprehensive redevelopment of the lands whilst maintaining their open character and delivering significant recreational amenity for the new and existing community.
- The proposed development will deliver 977 no. new residential units and therefore make a significant contribution to the delivery of housing in Dundrum and the wider context on currently underutilised serviced lands. The proposed SHD provides a good housing mix, reflective of local needs.
- the proposed development will deliver an 100% affordable housing scheme, whereby 20% of the units will be provided in line with Part V of the *Planning and Development Act 2000* (as amended) and the remaining 80% will be delivered as affordable housing under the *Land Development Agency Act 2021*. From a housing delivery perspective, this is considered to constitute a significant public benefit.
- As such, we maintain that the development will be an inclusive community with shared civic spaces, relevant community services and facilities and housing choices for a diversity of residents.
- Further in line with the Institutional Lands policy requirements, the Masterplan and proposed SHD scheme provides c.32% public open space, significantly in excess of the 25% required by the Development Plan. The public open space is high quality, accessible and inclusive in nature, maintains the open character of the lands and integrates landscape features such as the Walled Garden and mature trees.
- The proposed development sensitively integrates the existing landscape and built heritage to ensure a compatible relationship that protects the site's special character.
- The proposed connectivity and permeability embedded within the Masterplan proposal, and realised by the proposed SHD, facilitates the sustainable movement of future and existing residents. The provision of connections into existing residential streets provides a positive contribution to the surrounding area from a placemaking perspective.
- The design of the proposed SHD, including the transition in building height, gives rise to a sensitive relationship with existing surrounding development and minimises impact from an overlooking, loss of light and microclimate perspective, as demonstrated by the detailed Daylight and Sunlight Assessment and Microclimate Assessment.

- The proposed development provides increased residential density and height in line with the national guidelines while achieving an excellent overall standard of accommodation for future occupiers.
- The proposed SHD is supported by a full environmental assessment which demonstrates that the proposed development would not give rise to likely significant impacts upon the environment.
- The enclosed Natura Impact Statement (NIS) concludes that no significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of mitigation measures.

We trust that this submission is in order and look forward to written acknowledgement of receipt of this application in due course. Please revert to the undersigned with any queries arising.

Yours sincerely,



Lizzie Donnelly
Associate
Tom Phillips + Associates



APPENDIX A – Part V Validation Letter from DLRC dated 21st March 2022 and Approximate Costs



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Fiona Little
Senior Development Manager
Land Development Agency
Ashford House
18-23 Tara Street
Dublin 2

21st March 2022

Re: Proposed Development at The Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14 (Dundrum Central SHD)

Dear Ms. Little,

I refer to your proposed development at The Central Mental Hospital, Dundrum Road, Dundrum, Dublin 14, involving the construction of 977 residential units and refer particularly to your proposal, as follows, for compliance with the requirements of Part V of the Planning and Development Act, 2000 (as amended):

- Build and transfer to the Council, or such Approved Housing Body nominated by the Council, 196 units on-site for social and affordable housing comprising; 21no. Studio units, 84no. 1-bedroom units, 9no. 2-bedroom (3 person) units, 50no. 2-bedroom (4 person) units, 25no. 3-bedroom (5 person) units and 7no. 3-bedroom houses.
- Total indicative cost of the 196 units is €72,061,835 inclusive of VAT. This is calculated in accordance with agreed methodology and subject to the provisions of Section 96 of the Planning and Development Act, 2000 as amended.
- Indicative average unit costs:
Studio units - €232,651
1bedroom units - €292,549
2bedroom/3person units - €387,579
2bedroom/4person units- €438,194
3bedroom/5person units- €564,918
3bedroom houses - €440,163



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I wish to confirm that this proposal is capable of complying with the requirements of Part V of the Planning and Development Act, 2000, as amended, and of the County Development Plan and Housing Strategy.

It should be noted that acceptance of this proposal in no way contractually binds the Council or its agents to acquire the stated units, or such other units, or to acquire them at the stated prices, which are acknowledged as being indicative only and subject to full review and evaluation should planning permission be granted.

Any proposal for compliance with Part V will be subject to Planning Permission and funding being made available and agreement being reached on land values and construction/development costs. Furthermore, should planning permission be granted, the Council may seek a revision of the Part V proposal following evaluation of costs and land values, a review of current housing demand and determination of funding availability.

It should also be noted that Dún Laoghaire-Rathdown County Council is working with a specialised Approved Housing Body to support the delivery of accommodation for persons with intellectual disabilities within the Dundrum Central site as part of the delivery of Part V units on the site and note the commitment from the LDA, that subject to funding being made available, the LDA would collaborate with the Council to incorporate the design requirements for housing accommodation of this type in the Part V housing provision for the development.

Yours sincerely,

Aiden Conroy

Aiden Conroy
Administrative Officer
Housing Department



14 March 2022
60636734 / Dundrum Central
Cost Plan No.1 Part V Costs

1.00 Part V Apartments

Unit Type	Studio Apartment 41 m ²	1 Bed 2 Person Apartment 51 m ²	2 Bed 3 Person Apartment 69 m ²	2 Bed 4 Person Apartment 80 m ²	3 Bed 5 Person Apartment 103 m ²
Average Size (Nett Area)					
1.01 Construction Cost - Block 2 Affordable	€157,508	€198,700	€266,708	€308,102	€0
1.02 Construction Cost - Block 4 Affordable	€156,978	€198,031	€265,811	€307,065	€397,683
1.03 Construction Cost-Block 4 Social	€0	€198,031	€265,811	€307,065	€397,683
1.04 Construction Cost - Block 6 - Affordable	€163,815	€206,657	€0	€320,440	€415,004
1.05 Construction Cost - Block 9 - Affordable	€0	€0	€0	€254,761	€329,943
1.06 Profit - 7.5%	€11,958	€15,027	€19,958	€22,462	€28,881
1.07 Development Costs (Fees, finance and other costs)	€33,529	€42,298	€55,315	€64,015	€83,621
1.08 Land Cost	€1,519	€1,916	€2,506	€2,900	€3,788
1.09 Development: Average Cost Sub-Total	€206,440	€259,596	€343,890	€388,864	€501,369

1.10 Value Added Tax	€0	€0	€0	€0	€0
1.11 VAT on Statutory Fees, Contributions & Land @ 0%					
1.12 VAT on Construction/Profit Average Costs at 13.5%	€23,138	€29,077	€38,619	€43,463	€55,884
1.13 VAT on Design Team Fees at 23%	€3,073	€3,877	€5,070	€5,868	€7,665
1.14 Value Added Tax: Sub-Total	€26,211	€32,954	€43,689	€49,331	€63,549

1.15 Total Average Cost (including VAT) €232,651 €292,549 €387,579 €438,194 €564,918

2.00 Part V Houses

Unit Type	3 Bed Houses				
Average Size (Nett Area)	103 m ²				
2.01 Construction Cost - Block 2 Affordable					
2.02 Profit - 7.5%					
2.03 Development Costs (Fees, finance and other costs)					
2.04 Land Cost					
2.05 Development: Average Cost Sub-Total					€391,114

2.06 Value Added Tax	€0
2.07 VAT on Statutory Fees, Contributions & Land @ 0%	
2.08 VAT on Construction/Profit Average Costs at 13.5%	€42,762
2.09 VAT on Design Team Fees at 23%	€6,287
2.10 Value Added Tax: Sub-Total	€49,049

2.11 Total Average Cost (including VAT) €440,163



3.00 Estimated Cost to the Local Authority

Unit Type	Unit No.	Average Rate	Estimated Total
3.01 Studio Apartment	21	€232,651	€4,885,672
3.02 1 Bed (2P) Apartment	84	€292,549	€24,574,147
3.03 2 Bed (3P) Apartment	9	€387,579	€3,488,210
3.04 2 Bed (4P) Apartment	50	€438,194	€21,909,711
3.05 3 Bed (5P) Apartment	25	€564,918	€14,122,953
3.06 3 Bed House	7	€440,163	€3,081,142
3.07 Total Average Cost (including VAT)	196	€367,662	€72,061,835

4.00 Important Notes

- The costs above are 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 Council regarding compliance with Part V, including agreements on costs, will not be arrived at until after the planning permission has been secured, as is provided for under the Planning & Development Act 2000, as amended.
- We confirm that the methodology for estimating the costs set out above follows that set out in Table 2 of the Circular Letter 10/2015.
- The above is subject to change depending upon the nature of any final grant of permission, including any conditions and the assessment by the Housing Authority of the ultimate proposal.
- Land Cost has been offer by Savills on a purely indicative basis for purpose of this exercise and shall be subject to adjustment following a formal Existing Use Value at the time of any permission grant.
- The above costs exclude a provision for inflation with the base date for the costs being 1st March 2022.