THORNTON O'CONNOR
TOWN PLANNING

Response to Dublin City Council Opinion

In respect of an LRD Application for Permission for the Provision of a Mixed-Use Student Accommodation & Commercial Development at a c. 0.962 Ha Site at Gowan House, Carriglea Business Park, Naas Road, Dublin, D12 RCC4

Submitted on Behalf of Malclose Limited

November 2023

1.0 INTRODUCTION

On 26th May 2023, Thornton O'Connor Town Planning on behalf of Malclose Limited submitted a pre-application LRD consultation request to Dublin City Council. The purpose of this document is to respond to the specific information requested by Dublin City Council in their Notice of LRD Opinion (Ref. LRD6034/23-S2) dated 14th July 2023, further to a meeting held on 20th June 2023 with Dublin City Council and the Applicant/Design Team.

This Notice states that it is the Planning Authority's determination that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for Large-Scale Residential Development. The Planning Authority have set out key issues /areas that must be addressed in the application documents that could result in the proposal constituting a reasonable basis for making an application.

A response to the items raised in the Planning Authority's Opinion is set out throughout this document.

1.2 Summary of Development

The full description of the proposed development is as follows:

> "*Malclose Limited intend to apply to Dublin City Council for a 7-year permission for a large-scale residential development principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.*
>
> *Works to upgrade the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.*
>
> *On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriages of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.*
>
> *The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.*
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> *The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement*

with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level."

2.0 RESPONSE TO THE DUBLIN CITY COUNCIL OPINION

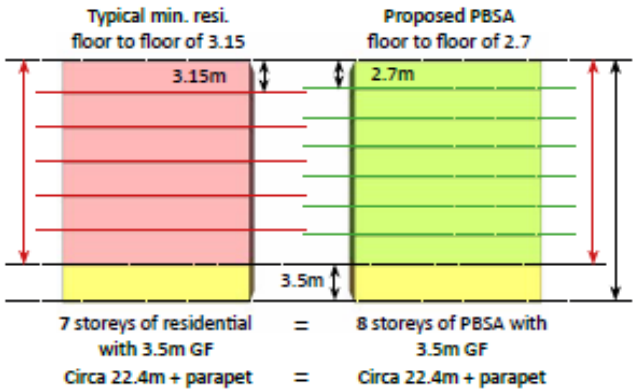
No.	Item to be Addressed	Response
1. PRINCIPLE OF DEVELOPMENT		
1	Further consideration and / or justification of the documents as they relate to compliance with local planning policy to address significant material issues of concern regarding the suitability and viability of this location for the provision of a large number of student accommodation units. Policy QHSN45 of Dublin City Development Plan 2022-2028 supports the provision of student accommodation "*on campuses or in appropriate locations close to the main campus or adjacent to high-quality public transport corridors and cycle routes*". In assessing applications for purpose built student accommodation the planning authority will have regard to the location in terms of access to university and college facilities by walking, cycling or public transport. This proposed development site is not located on a campus, close to a main campus or in the inner city. The site is remote and significantly outside of walking distance of any university or college facilities and their related services & infrastructure. The local area is in need of regeneration and consequently lacks the necessary amenities and services to support the significant number of student accommodation units proposed. Overall, it is not considered that the site is suitable nor viable for student living and its associated travel patterns. The submission that the future Bus Connects emerging route network would enhance the connectivity of the site with the surrounding area is noted. However, the Bus Connects project at this location requires significant infrastructural upgrades. This development is at an early stage has yet to undergo a number of statutory processes and therefore can be	**Please see a detailed response to this Item in Section 3.0 of the Planning Report and Statement of Consistency, demonstrating why the site is eminently suitable for the provision of Student Accommodation.** **In summary:** • **Student Accommodation is 'Permitted in Principle' on the site's Z14 Zoning Objective in the recently adopted Dublin City Council Development Plan 2022-2028, with Student Accommodation only permitted in principle in two other DCC zoning objectives.** • **The subject site is located within 150 metres of a Luas stop- the highest quality public transport available in the City. The Bluebell Luas stop provides direct access for students to TU Dublin in Tallaght, the City Centre Campuses and further public transport options for campuses such as DCU and UCD. It has been clearly demonstrated in the public transport capacity study that there is adequate capacity on the red-line Luas and on local bus services to serve the proposed development.** • **The accommodation's location would suit students in the proximate Ballyfermot Further Education campuses which is renowned in the Country for its media, music and radio courses, drawing students from all over the Country.** • **The site is proximate to many Hospitals including notably St James' Hospital, Tallaght Hospital and Crumlin Children's Hospital. Thus, this will provide proximate accommodation for Student Nurses and Doctors who will be working in these facilities as part of their training.** • **The City Edge Strategic Framework (CESF) within which the site sits expressly supports the provision of Student Accommodation in this area as does policy QHSN45 the Dublin City Development Plan which expressly references sites**

	afforded limited material determining weight in terms of deciding whether the site is suitable for the provision of 980 student accommodation units. The site forms part of the Naas Road SDRA 5, which sets out sets out guiding principles for development along the Naas Road as part of the future City Edge project. The key vision of these Plans is to create sustainable successful communities. The proposed student accommodation use, which is transient in nature, would not contribute to the provision of a sustainable community as envisaged by the Plan Policy context. Furthermore, the potential for short term tourist accommodation outside of term time as per the definition of student accommodation under the Planning and Development (Housing) and Residential tenancies Act 2016, and the lack of local tourist amenities to serve the same, is also a concern. Having regard to the above, the planning authority considers that the site is not suitable for the provision of such a large number of student accommodation units should be developed for residential purposes as envisaged by the City Development Plan.	**beside high-quality public transport, such as the subject site as suitable for Student Accommodation.** • **By providing accommodation outside the prime City Centre location, more affordable accommodation can be provided for students.** • **The CESF notes that the area's *population generally falls below both State and wider Dublin City in terms of educational attainment (for e.g. at Upper Secondary and Third Levels) and that the provision of a greater range of employment opportunities in the area can help open up awareness of career opportunities and stimulate improved education achievement. The CESF proceeds to state that the presence of new education facilities can also increase engagement in education at both school and post-school ages.* There are no other Student Accommodation facilities around this area and similar to the presence of education facilities, the introduction of Student Accommodation into the area can have the same effect of encouraging greater participation in third-level education. The new residential developments granted permission in the surrounding area will include a range of unit sizes to facilitate young couples to growing families and through the effect of the visibility of students living and working in the immediate area, people may be encouraged to progress with further education.** • **As there is no other Student Accommodation with the area, the proposal will provide a mix of residential typologies and a diverse population into this newly regenerating area, which is key for creating new organic communities. The proposal will introduce a tenure diversity and mix, with the students bringing a different population cohort into the area, who can work in and utilise the commercial facilities provided in the subject application and the commercial/retail facilities in the surrounding granted permissions and wider area. This will significantly contribute to the new Neighbourhood that is trying to be created on these former industrial lands.** **It is clear that the subject development will be a positive addition to the area and will enhance legibility and activate the street frontage at the subject location. Having regard to both the urgent demand for student accommodation bedspaces in Dublin City, the location of the subject site to exceptional public transport, and the**

		pattern of development in the surrounding area, which is undergoing intensive regeneration, it is considered that the subject development is an appropriate use for the site and can contribute significantly to the Naas Road and City Edge regeneration lands.
2. Student Accommodation		
	Documentation outlining how the scheme will be professionally managed including confirmation that all occupiers will be students registered with a third-level institution and satisfies the following Development Plan requirements: I. Section 5.5.7 Specific Housing Typologies – Provision of Student Accommodation II. Section 15.13.1.1 Unit Mix III. Section 15.13.1.2 Daylight and Sunlight IV. Section 15.13.1.3 Communal Facilities V. Section 15.13.1.4 Car Parking / Bicycle Parking VI. Section 15.13.1.5 Temporary Use as Tourist Accommodation The submission should clearly demonstrate that the proposed communal facilities are appropriate to the intended rental market having regard to the scale and location of the proposal remote from university campuses and other services.	**Please see enclosed a *Student Operation Plan* prepared by Malcose Limited, a subsidiary of Hollybrook Homes who as detailed in the Architectural Design Statement have significant experience in the construction and operation of Student Housing.** **i. Please see Section 8.2.2 of the Planning Report and Statement of Consistency.** **ii. Please see Section 8.2.2 of the Planning Report and Statement of Consistency.** **iii. Please see enclosed a detailed Daylight & Sunlight Report prepared by 3D Design Bureau.** **iv. Please see Section 8.2.2 of the Planning Report and Statement of Consistency.** **v. Please see the Parking Management Plan prepared by Barrett Mahony Consulting Engineers.** **vi. Please see Section 8.2.2 of the Planning Report and Statement of Consistency.** **Many of the enclosed documentation including principally the *Planning Report and Statement of Consistency* and *Architectural Design Statement* detail the internal and external communal facilities available to the students. As detailed extensively in the *Social Infrastructure Audit*, there are existing facilities in the surrounding area and more and more will come on stream as the surrounding sites get redeveloped.**

		Whilst this Opinion by Dublin City Council states that the site is remote from University Campuses, the City Edge Strategic Framework acknowledges the proximity of third level facilities in the area and the importance of providing increased educational facilities in the area. In this regard, Student Accommodation is a critical component for many students attending third level institutions. **Finally, as detailed extensively, the Luas is 150 metres from the site providing access around the City Centre for students.**
3. Height		
a)	The proposed application shall be accompanied by justification and rationale of the height of the proposed development. It should be noted from the Guiding Principle Map associated with SDRA 5 – Naas Road, that the current application site has not been highlighted as being suitable for locally higher buildings or the development of a landmark building.	**Please see Section 8.2.5.2 of the Planning Report and Statement of Consistency and the Townscape and Visual Impact Assessment (TVIA) prepared by Modelworks in response to the heights proposed, which take their reference from the permitted adjoining Concorde and Carriglea developments.** **In relation to SDRA 5, it is noted that it selects a number of sites along Naas Road and provides an indicative design brief for that site. There is no such indicative brief for the subject site and it has been demonstrated in the Planning Report, Architectural Design Statement and TVIA by Modelworks why the proposed height is acceptable on the subject site.** **It is noted that the height of Block 2 has decreased in height since the pre-application consultation. Significant amendments have been made to Block 1 to slenderise the building as detailed in the Architectural Design Statement by HKR Architects. This has resulted in a slight increase in the pop-up height to 15 No. Storeys but this has been done in the interest of providing a slender building and the evolution of the design is detailed extensively in the Architectural Design Statement.** **In conclusion, we note that in granting permission for the adjoining Concorde Development (ABP Ref: 312218-21), the Board stating the following in their Order:**

		"It is considered that permission for the proposed development should be granted having regard to recent neighbouring permissions in the area, including the pattern of residential density and building heights granted permission under Dublin City Council Register Reference Number 3228/20 (Nissan Site) and An Bord Pleanala References Numbers ABP-311606-21 (Carriglea Industrial estate site) and ABP 307804-20 (Royal Liver Insurance Retail Park). The proposed development is to an extent, continuing on the pattern of development granted in those permissions." **In summary, the permitted maximum heights in these schemes were as follows:** **Carriglea – 8 No. Storeys** **Concorde – 10 No. storeys** **Nissan Site – 15 No. storeys** **Royal Liver Site – 18 No. storeys** **It is thus clear that the proposed development's height of part 9 to part 15 No. storeys continues '*the pattern of development granted in those permissions*', noting that Student Accommodation has a lesser floor to ceiling height than standard apartments. As demonstrated in the graphic below extracted from the Architectural Design Statement, 8 No. storeys of Student Accommodations generally equates to 7 No. storeys of residential accommodation so at a pop up maximum height of 15 No. storeys, this principally equates to 13 No. storeys residential, It was considered that the adjoining Concorde development in particular has quite a monotonous building height and thus the proposed development seeks to provide a more varied and interesting roof profile, overall increasing the quality of the proposed development.**

		Typical residential vs PBSA height comparison diagram 

		
b)	The submission should demonstrate how the scheme complies with the prevailing height along the Naas Road and Policy SC15, SC16 and SC17 and Appendix 3 of the Dublin City Development Plan 2022-2028.	**Please see Section 8.2.5.2 of the Planning Report and Statement of Consistency and the *Townscape and Visual Impact Assessment* (TVIA) prepared by Modelworks which demonstrates how the proposed development accords with Table 3 of Appendix 3 of the *Development Plan*.** **As strongly demonstrated in the quote above from An Bord Pleanála, in assessing the adjoining Concorde scheme the proposed heights are clearly in line with prevailing heights along the Naas Road. The proposed height, as stated in the *TVIA*, is predicted to produce a 'moderate' townscape effect, in that the character of the**

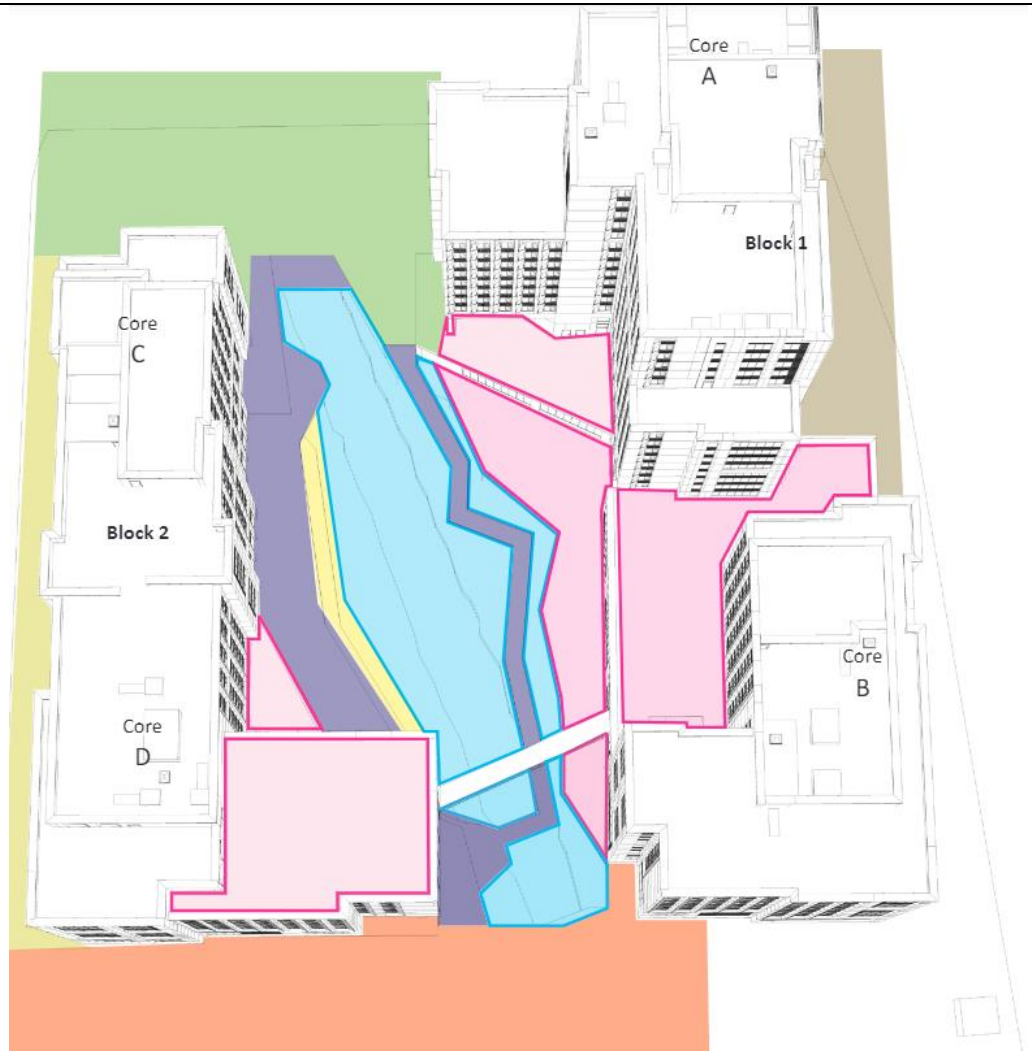
		surrounding environment is altered but in a manner that is consistent with existing and emerging baseline trends. **The site is located next to a public transport hub and the busy Naas Road that serves as the core pedestrian spine. The tallest part of the building has been reduced in mass to achieve a more desirable slenderness. The proposal appropriately varies in scale to ensure it fits well with its context, ensuring it is not monolithic and offering an interesting design that will enhance the skyline.**
c)	The application shall be accompanied by an Architectural Design Statement to respond to Section 15.5.8 of the Dublin City Development Plan 2022-2028.	**Please see enclosed an Architectural Design Statement prepared by HKR Architects.**
4. Planning Application Documentation – Planning Thresholds		
a)	The proposal should be supported by the necessary analysis and documentation to demonstrate the proposed design and rationale for the scheme, in accordance with Table 15-1, Section 15.2.3 Planning Application Documentation - Planning Threshold of the Dublin City Development Plan 2022-2028 which sets out the supporting documentation required.	**The Planning Threshold Table has been reviewed and all necessary Report and Drawings have been prepared.** **Please refer to Appendices B and C of the Planning Application Form, which details all documents and drawings enclosed.**
b)	A Landscape Design Report having regard to Section 15.6.8 of the Dublin City Development Plan 2022-2028.	**A comprehensive *Landscape Report* prepared by Stephen Diamond Associates has been produced as part of this submission, having regard to Section 15.6.8 of the *Dublin City Development Plan 2022-2028.* The *Landscape Report* illustrates the proposed boundary treatments, public realm improvements and the daylighting proposed for a section of the culverted River Camac underneath the subject site.**
c)	In accordance with Policy CU025, a specific use for the community/cultural space should be identified from an evidence base/audit of the area and the space must be designed to meet the identified need. Visual and physical linkages between the	**A Cultural Impact Assessment has been prepared by Turley and is enclosed with this application.**

	community/cultural space and the area of public open space should be demonstrated. Operational details and a management plan for the community/cultural space should be submitted.	**Cultural and community spaces will be provided on-site, providing 1,422 sq m of internal space and 131 sq m of external space. The cultural space, totalling to 729 sq m, will principally comprise a digital hub and ancillary and storage space. The digital hub is intended to be used for podcasts, YouTube studio space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives. In this regard, it is considered that the space could be utilised by the Ballyfermot College which specialises in music and media as well as the immediate local community.** **The community space, totalling to 512 sq m, will principally comprise co-working areas, a café and ancillary space, allowing residents of the nearby permitted residential schemes to work in their local area when not in the office. This can also allow synergy between business people and the students living in the scheme.** **Special arrangements of landscape elements such as planters against the building elevation have been carefully considered to act as frames where people passing through the site get a glimpse into the activity happening inside of the ground floor of Block 2 where the proposed café and co-working area will be. The form of each planter guides and encourages individuals to come inside the buildings utilise the various uses proposed.** **Outdoor dining areas include tables and seats and are located near the café as a linking welcome card between the community and cultural indoor spaces and the outdoor open space.**
d)	All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floor space as part of their development at the design stage. The proposal should accord with this requirement.	**Cultural and community spaces will be provided on-site, providing 1,422 sq m of internal space and 131 sq m of external space. The cultural space, totalling to 729 sq m, will principally comprise a digital hub, co-working space and ancillary and storage space. Digital hubs are spaces for people to gather and work together on projects, providing a shared unit that promotes team work, innovation and creativity. In this location where there will be a student population and having regard to the proximity to the Ballyfermot College, which specialises in media, it is envisaged that the digital hub space will be utilised for podcasts, YouTube studio**

		space, gallery space, kitchen, photography studios, makerspace and general shared working for creatives. **The community space, totalling to 512 sq m, will principally comprise co-working areas, a café and ancillary space. The co-working areas provides space for people generally living in nearby residential developments to use should they wish to work from home, whilst benefiting from an office-like experience. It can also be utilised by start-ups who do not yet have permanent office space. There is also 312 sq m of shared cultural and community space in the form of a shared reception and an accessible break-out space.**
5. Residential Amenity		
	The proposed application shall be accompanied by the following information:	
a)	A detailed daylight and sunlight assessment of the proposed development as per discussions in the LRD meeting, in accordance with the relevant Guidelines- set out in Appendix 16 of the Dublin City Development Plan 2022-2028 which will demonstrate an acceptable level of day light and sunlight for the proposed occupants, and existing neighbouring properties.	**Please see enclosed a detailed *Daylight and Sunlight Assessment* prepared by 3D Design Bureau.**
b)	A detailed Housing Quality Assessment is required, including a detailed schedule of accommodation which shall indicate compliance with all relevant standards (including the direction of the aspect) in accordance with the Sustainable Urban Housing: Design Standards for New Apartments.	**HKR Architects have prepared a detailed Housing Quality Assessment and this is provided within the *Architectural Design Statement.***
c)	In the interest of clarity all units should be clearly labelled on the drawings.	**Noted.**

d)	In the interest of clarity all dual aspect units should be clearly indicated on the floor plans.	**Noted. Some 67% of all the units are dual aspect. Please refer to the Architectural Design Statement by HKR.**
6. Public & Communal Open Space, Landscape and Biodiversity		
	The following requirements of the Parks and Landscape Services Department should be addressed:	
a)	**Public Open Space (POS):**	
i)	A key plan showing typology of open space areas and respective calculations of provision shall be provided in the landscape submission. POS shall include the day-lighted riparian corridor for calculations as it performs ecological services.	**A key plan showing the typology of the open space areas and respective calculation breakdowns have been provided and is found on drawing 22-579-SDA-PD-DR-XX-302. Some 31% (3,000 sq m) of the total site area has been identified as useable and accessible public open space. The proposed public open space is broken down into a Central Plaza, Connection Plaza, Green Boulevard, and an Elevated Walkway.** **A further 13% (1,261 sq m) of the total site area is dedicated to the riparian zone, however this does not count towards the useable public open space as this area is not accessible to members of the public or students and access will only be provided for maintenance purposes. This is to protect the new flora and fauna created as a result of daylighting the River Camac. Despite not contributing to the 'usable' open space, its visual and biodiversity gain to the site will be exceptional, providing a very high-quality living environment for the students.**
ii)	The POS area to be clearly defined and separate from COS provision to maintain residential privacy/security within the scheme, e.g. use of materials to define the public areas as well as fencing, gates and wayfinding signage. The landscape report shall state what specific measures are used for POS legibility.	**The image below as extracted from the Architectural Design Statement details the different types of external amenity space across the scheme from student amenity, community/culture amenity, public open space and the riparian zone.** **The proposed communal open space for students will be provided at the rooftop garden at the second floor of Block 1, a terrace at first floor of Block 2, and a terrace at basement level of Block 1. (It is noted that the terrace at first floor of Block 2 can be used by students but as it does not adhere to the required sunlight criteria, the floor area does not form part of the 5.2 sq m student amenity space detailed in the planning documents. This is additional surplus space).**

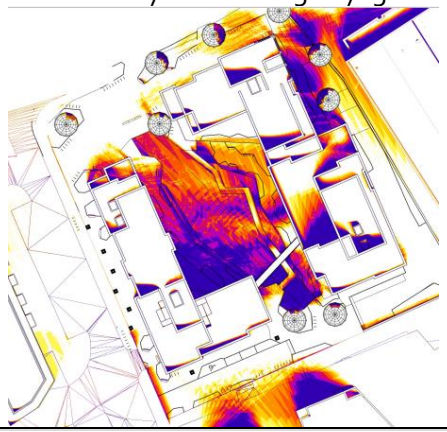
		The entire ground floor, external to the buildings, will be public open space. As access to the student accommodation is for students only, members of the public will be unable to access any of the student communal amenity space.

		 **Separating measures such as a minimum 1.5 metre planted buffer between the public open space at ground floor and the communal amenity space at basement**

		level have been provided along Block 1, ensuring there is sufficient privacy to the amenity terrace at basement level. The Elevated Walkway at ground floor level, above the riparian zone, has been designed to be offset of a minimum 1.5 metres from the communal amenity terrace at basement level. The arrangement of the proposed large trees within the riparian zone further provides a privacy screening with their canopies between the public open space and communal amenity space.
iii)	The POS Plaza design requires strengthening of its buffering function to the Naas Rd corridor to mitigate noise, visual impact and air quality. Cross sections from the plaza to the road corridor shall be submitted to indicate effectiveness of landscape berms.	**Buffer planting has been provided along the interface between the proposed development and Naas Road in the form of 4 No. large mounded in-to-ground planters. Openings with footpaths create permeability for pedestrians to give them the opportunity to walk along the inside of buffer planting and separating building elevation and provide a protected route to mitigate the noise, visual and air quality from the oncoming traffic along Naas Road.** **Berms of approximately 1 No. metre in height have been introduced within the 4 No. planters along the busy road. The understorey is planted with a mix of dense pollen and nectar-rich plants to attract pollinators and improve biodiversity on site and in the vicinity.** **A combination of large and small native Irish tree species further separates and mitigates noise, visual impact and air quality and provides protection from Naas Road and the public open space on site.**
iv)	The plaza space requires activation with surrounding ground level building uses such as café/restaurants/ coffee docks, please indicate on master landscape plan.	**To activate spaces surrounding ground-level building uses such as the café proposed in Block 2, designated outdoor dining spaces have been provided. This is shown on the Landscape Masterplan with round tables and chair symbols indicating the proposed location of the outdoor dining space.**
v)	Public artwork to enhance identity of space of the plaza shall be required. Please indicate potential location and possible theme within the landscape submission. The plaza shall deploy the use of natural stone surfaces throughout.	**A large totem-style sculptural piece is proposed in the Central Plaza, fronting Naas Road. A sculptural walk is also proposed at basement level within the student amenity terrace.**

		The proposed theme for these sculptures is 'Wildlife of River Camac'. These sculptures will relate to the animals that are found within the riparian corridor such as birds (heron, grey wagtail and kingfisher), fish (brown trout), insects and pollinators (butterflies and dragonflies), and amphibians (frogs). **Large granite boulders have also been introduced as public artwork to enhance the riparian identity of the site as well as creating a land art constellation within the scheme. Granite boulders spill out of the riparian zone and into the public open space on both sides of the newly opened portion of the River Camac. Boulders at ground level act as informal seats and create an excellent environment for spontaneous play for people of all ages.**
vi)	The POS is integrated into the development and will not be taken in charge by DCC Park Services.	**Noted**
vii)	River channel design: The overall daylighting of this section of Camac is welcomed and this will contribute positively to the ecological quality of the river. There is however concern on use of an extensive concrete subsurface as indicated on the submitted drawings. A bioengineering approach is required for the riparian corridor that permits both natural vegetation establishment and protects against flooding erosion. The possible use of stone mattress gabions or other methods to allow riverside vegetation to root into the ground and mitigate expected flooding erosion should be reviewed and further details submitted.	**An updated Hydromorphogical Quantitative Technical Assessment (HQTA) prepared by AWN is enclosed. As a result of the proposed new daylighting of the Camac River the hydromorphological condition will be significantly improved from 'Poor' to 'Good' at the site, as established in the River Hydromorphology Assessment Technique (RHAT) guidelines. The development of the proposed riparian areas represents a lateral expansion of the river which will be connected to the flood plain area of the Camac River. The proposed developments will not deteriorate the existing river profile, and no disruption in lateral connectivity is proposed. Therefore, the hydrological regime of the river will not be affected.** **The HQTA report also included a Hydraulic Analysis section that address the situation regarding sediment and erosion based on the HEC-RAS model prepared by BMCE. With regard to the proposed granite boulder size, there would be sufficient resistance to avoid the rock moving even for the 0.1% AEP event. The proposed 300mm thick gabion mattress would resist the extreme velocity projected for a 0.1% AEP event. With regard to sedimentation, according to the Hjulstrom-Sundborg diagram, the flow for the mean and dry weather condition (Q50 and Q95,**

		respectively) would allow transport and deposition of different size of sediments for the mean and dry weather condition. The initial proposal for the riparian zone floor has been redesigned. The concrete bed previously extended underneath the planting at either side of the culvert channel approximately 10 metres below the ground floor level has now been designed out, to remove the hard separation between the planting in the riparian zone and the existing subsoil. Longer vertical walls to the Architects' and Engineers' design and specification have been provided. The culvert bed is still to be retained. Native tree, shrub and ground flora have been included in the landscape design of the proposed development surrounding the daylighted section of the River Camac to create a pocket of riparian habitat, along with smaller areas of wildlife ponds, which provide potential breeding habitat for local amphibians and invertebrates, such as dragonflies. To prevent flooding erosion and create a more natural functioning and looking river corridor in the day-lit section of the river, various bioengineering solutions are utilised. 'Rip-Rap' embankments conceal and address the straight geometrical design of the existing culvert bed that is retained. Live Willow Staking and Mattress are proposed to stabilise the embankments through the use of intricate and dense root structures of willow species. The roots will blind the stone in the Rip-Rap with the soil and hold the landscape interventions in place during floods. A Gabion Mattress on the culvert bed is proposed to enhance the concrete riverbed and to slow down water as it passes through the channel. The purpose of introducing the gabion floor is to create favourable conditions for sedimentation with the aim to provide a break within the hard concrete culvert channel and create a naturalistic environment on the bed for various plant and animal species to thrive.

		Large granite boulders of various sizes greater than 1 metre in diameter confirmed by the Engineer to stay in place have been positioned along the water corridor as anchors / ballast to keep all of the previously mentioned bioengineering techniques in place. The huge size of the boulder provides landings for wildlife, to bask feed and preen. Please refer to drawing No. 22-579-SDA-PD-DR-LGF-001, 22-579-SDA-PD-DR-XX-201 to 22-579-SDA-PD-DR-XX-2017 Sections 01 to 06 for full details and visual representation of the riparian zone and bioengineered approaches.
viii)	The retained soil conditions following excavation to culvert level will require amelioration to support plant growth, details of this issue shall be presented.	**New and approved imported clean topsoil and subsoil will be provided on-site. The existing subsoil free from contaminants on site will be ripped to improve drainage and support plant growth within the riparian zone flowing the excavation to the culvert level and construction.** **Topsoil will be provided to varying profile depths approximately 300-600mm depth to facilitate a varied range of native riparian vegetation to comprise ground cover and scrub through to large trees.**
ix)	Daylight access to ground level open space and riparian zone (image below) is constrained by higher southern buildings which will cast greater shadow on to some areas. Building height reduction would therefore be of benefit by maximizing daylight to these open spaces. 	**The height of Block 2 previously proposed at Pre-Planning stage was part 9 No. to part 12 No. storeys, however, the height has been reevaluated to respond to a number of issues including daylight concerns raised by Dublin City Council. The height of Block 2 has thus been reduced by a single storey, now proposing a part 9 No. to part 11 No. storeys.** **The open spaces at ground floor level have been assessed for the level of sunlight received. It was concluded that all spaces receive adequate levels of sunlight and meet the BRE Guidelines. Please refer to the *Daylight and Sunlight Assessment* prepared by 3D Design Bureau for further information.** **As requested by the Parks Department, the riparian zone, located mostly some 10 No. metres below ground floor level, is inaccessible for members of the public and student residents, with access only permitted for maintenance purposes. This is to protect the new flora and fauna produced as a result of daylighting the River Camac**

		as well as the newly exposed water body. A typical natural riparian corridor is characterised by low sunlight levels with humid conditions and large canopies. The new riparian habitat and native riparian planting have been carefully chosen so that flora and fauna are able to thrive in wet and less daylighted conditions. The shady conditions are vital for species such as lichen, mosses and ferns found along rivers to thrive. High levels of sunlight in this type of wetland habitat pose a threat to some species drying out. Please refer to the *Landscape Report* by Stephen Diamond Associates and the *Biodiversity Enhancement Plan* by Enviroguide Consulting for details on the flora and fauna proposed along the riparian zone. We note that on Page 50 of the very recently published *Draft Sustainable and Compact Settlements Guidelines for Planning Authorities* (August 2023) states the following: *"In drawing conclusions in relation to daylight performance, planning authorities must weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision, against the location of the site and the general presumption in favour of increased scales of urban residential development. Poor performance may arise due to design constraints associated with the site or location and there is a need to balance that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution."* Whilst the issue at hand relates to sunlight (noting that the required usable spaces meet and exceed the BRE Guidelines), the same principles apply in our opinion. The scheme proposes a high-quality residential scheme with a site layout that promotes the daylighting of the River Camac which brings associated significant biodiverse enhancements to the site and the wider area. The proposed development secures the comprehensive regeneration of this site and provides a highly effective urban design and streetscape solution. As such, it is considered that the proposed development provides an appropriate balance between the required densification

		of a core urban site located beside high-quality infrastructure to provide much needed student accommodation on an appropriately zoned site.
b)	**Communal Open Space (COS):**	
i)	(5-7m² per bed space) -490om² minimum required and adequate proposed at 5595m²	**As the number of bedspaces proposed has been reduced from 980 No. Bedspace to 941 No. Bedspace, the updated required minimum communal open space is now some 4,705 sq m. The scheme provides some 4,880 sq m of communal open space for students of the accommodation to enjoy, equating to the equivalent of 5.2 sq m per student.**
ii)	Active recreation requires enhancement in both POS and COS. e.g. external gyms, half basketball, table tennis and yoga spaces. These should be located to avoid disturbance to residential facades. The master landscape plan shall be updated with these provisions.	**A large portion of the basement level terrace is provided to facilitate active recreation in the form of an outdoor exercise studio. This open space is accessed through the internal amenity space at basement level and is set within the scenery of the riparian zone. This area is a multifunctional space whereby the primary use is an outdoor gym for students to bring out mats for yoga sessions or various types of free weights such as kettlebells for conditioning and strengthening classes / exercises.**
c)	**Materials:**	
i)	Planting design shall include the use of large canopy trees (e.g. Oak, Lime, and Beech) where space allows for canopies, such as at the plaza. 50% of external bicycle parking shall include weather covers and 50% of external seats/benches shall include arm and back-rests.	**Native species of trees provide extensive canopy cover within this scheme to promote Irish nature within urban areas. The Landscape Architects have specified large evergreen scots pine trees and deciduous trees like the native rowan, silver birch and bird cherry.** **Some 50% of bicycle stands are covered by the building overhand or by a vegetated bicycle stand shelter planted with sedum and 50% of benches will have an arm and backrest.**
d)	**Arboriculture:**	
	Existing trees are preferably retained on development sites. The tree survey & impact plan submitted indicates the development impact, which as proposed, removes all 34 existing trees, the majority of which have been previously heavily pruned. This is a high impact and amendments to the layout and seeking retention where proposed open space includes existing trees should be reviewed. The tree impact plan	**All 34 No. existing trees are required to be removed on-site. Trees are removed due to their current health condition, some to facilitate the daylighting of the river, and some to facilitate development of the site. Please refer to the Arboricultural Report prepared by The Tree File for full details of the condition of existing trees.**

	shall include a key/legend for proposed development components for clarity. Compensatory tree planting under the landscape scheme shall equal or preferably exceed the tree quantities removed.	**To compensate for the loss of the existing trees, 225 No. Native trees have been proposed within the site. 54 No. within the riparian zone, 142 No. within the public realm on the ground floor and 29 No. within the student amenity terrace at basement level and the roof garden at second floor level.**
e)	**Biodiversity**	
i)	The AA screening report concludes that there is no requirement for an NIS. This shall be reviewed in consideration of the hydrological linkage that exists from the Camac River to Dublin Bay. The impact of diluted pollutants depends on the type of pollutant and its toxicity and the duration of its release into the Camac.	**The *AA Screening Report* has been updated to reflect the updated design of the proposed development with the daylighting of the River Camac.** **AWN has prepared a Hydrological Risk Assessment which includes a conceptual site model (CSM) following a desk top review of the site and surrounding environs. Based on this CSM, plausible Source-Pathway-Receptor linkages have been assessed assuming an absence of any measures intended to avoid or reduce harmful effects of the proposed project (i.e., mitigation measures) in place at the proposed development site. During construction and operation phases there is no direct source pathway linkage between the proposed development site and any Natura 2000 sites located in Dublin Bay (i.e., South Dublin Bay SAC and South Dublin Bay and River Tolka Estuary SPA). There are indirect source pathway linkages from the proposed development through the Camac River and foul sewers which eventually discharges to the discharges to South Dublin Bay.** **Even disregarding the operation of design measures including SuDS on site, it is concluded that there are no pollutant linkages as a result of the construction or operation of the Proposed Development which could result in a water quality impact which could alter the habitat requirements of the Natura 2000 sites within South Dublin Bay.**
ii)	*However, the hydrological pathway to these downstream European sites is 11.5km downstream along the River Camac and River Liffey, over which any potential pollutants that may enter Dublin Bay via surface water run-off from the Site would become diluted to indiscernible levels. Therefore, this hydrological pathway to these downstream European sites is considered insignificant.*	-

iii)	A biodiversity enhancement plan shall be submitted, indicating measures for proposed architecture and landscape to create urban habitats.	**A *Biodiversity Enhancement Plan* has been prepared by Enviroguide Consulting in conjunction with the design team to maximise the opportunities for biodiversity enhancements. Only native tree species have been specified as part of the new proposed planting to promote Irish plants. Nectar and pollen-rich understorey plants have been chosen to create a favourable environment for pollinators such as bees and butterflies at various levels in the public and communal open spaces. A simple planting mix is proposed for the riparian zone to protect the topsoil and allow the natural gradual colonisation of plant species to this area. The river is a fast-moving water habitat. Some 3 No. ponds within the riparian planting complement the dynamic nature of the river and create a boggy still-water habitat to further enhance biodiversity within the riparian zone and create a potential breeding area for amphibians. Large boulders provide areas for wildlife to bask, feed and preen on.**
iv)	The ecological design of the day-lighted Camac requires coordination between the project ecologist, landscape architect and engineers to create new habitat within the retained culvert base river bed and surrounds. A detailed plan of the river with proposed features, (e.g. riffles and gravel beds for spawning etc.) should be presented.	**Please refer to the landscape drawings and report prepared by Stephen Diamond Associates for full details regarding the river habitat enhancement and improvement measures proposed within the culvert bed.** **Different bioengineering solutions have been implemented to create a new habitat within the daylighted section of the River Camac. Gabion Mattress is proposed to be placed on the existing culvert bed to create conditions for sediment deposition and mimic gravel beds found in natural rivers and slow down the water flow. Large boulders placed in various locations within the bed, such as river banks, weirs, and in the centre of the culvert bed, create riffles and vary the speed of the river. A new and existing weir aerate the water and improve its quality.**
v)	A bat survey shall be submitted for this application.	**Two bat surveys have been completed for the development as detailed in the *Ecological Impact Assessment* by Enviroguide Consulting, one in September 2022 and one in August 2023.**
f)	**Green Roof Plan:**	
i)	Please review with new DCC Blue / Green Roof guidelines and include a schedule of proposals with requirements from guidelines.	**Blue or Green roofs are proposed for all suitable roofs in the development, with the exception of the roof plant areas. Further details of the blue and green roof proposals are included in Section 2.6 of the *Civil Engineering Infrastructure and***

		Surface Water Management Report **and drawings (Nos. GWH-BMD-ZZ-XX-DR-C-1002 and GWH-BMD-ZZ-XX-DR-C-12310) prepared by Barrett Mahony.**
7. Drainage		
a)	**Camac River – Culvert:**	
	In order to support the requirements of the Water Framework Directive (WFD), development sites with an area greater than 0.5 Ha are required to incorporate a minimum setback of 25m that is free from development, measured from the top of river (or edge of a culvert in some instances); hence the setback is subject to a hydromorphological study. DCC Drainage previously recommended that the River Hydromorphology Assessment Technique (RHAT) – approved by the EPA - be the method used as the basis for a hydromorphology report but it does not appear to have been used in the submitted Hydromorphological Qualitative Technical Assessment (HQTA). RHAT could have been used to score the existing scenario and also to score any proposed interventions and hence to inform the design and provide evidence as to why one river corridor scenario was chosen over and above another. DCC understands the current hydromorphological condition at this location to be 'poor' but in order to comply with the WFD, it should be demonstrated that either: i) As a result of the proposed new development the hydromorphological condition would be improved to 'good' at the site, or ii) Show a substantial improvement in the hydromorphological scores along with a rationale as to why no further improvements are possible at this point in time but that provision for future improvement has been designed into the proposals for the new development. For the most part, a smaller setback than the minimum of 25m required by the DCDP is proposed. The minimum setback from the existing culvert	**An updated Hydromorphogical Quantitative Technical Assessment (HQTA) prepared by AWN is enclosed. This report has now included the River Hydromorphology Assessment Technique (RHAT) guidelines in its analysis. As a result of the proposed new daylighting of the River Camac, the hydromorphological condition will be significantly improved from 'Poor' to 'Good' at the site, as established in the RHAT guidelines. As such, it is concluded that the 25 metres set-back distance is not essential as the ecological functioning and water quality of the river are expected to be improved at a local scale due to the proposed daylighting of the Camac River. A typical natural riparian corridor is characterised by low sunlight levels with humid conditions and large canopies. The shady conditions are vital for species such as lichen, mosses and ferns found along rivers to thrive. High levels of sunlight in this type of wetland habitat pose a threat to some species drying out.** **The development of these riparian areas represents a lateral expansion of the river which will be connected to the flood plain area of the Camac River. The proposed developments will not deteriorate the existing river profile, and no disruption in lateral connectivity is proposed. Therefore, the hydrological regime of the river will not be affected.** **The HQTA report also included a Hydraulic Analysis section that address the situation regarding sediment and erosion based on the HEC-RAS model prepared by BMCE. With regard to the proposed granite boulder size, there would be sufficient resistance to avoid the rock moving even for the 0.1% AEP event. The proposed 300mm thick gabion mattress would resist the extreme velocity projected for a 0.1% AEP event. With regard to sedimentation, according to the Hjulstrom-Sundborg diagram, the flow for the mean and dry weather condition (Q50 and Q95,**

	at pinch point is approx. 3.6m. The basement appears to be directly adjacent to the proposed river channel in places. The HQTA states that the average setback is in the region of 14m but it is unclear whether this includes overhanging structures or not. In any case, the impact of this or any proposed reduction on the stated aims and objectives of DCC and their obligations under the WFD has not been appropriately investigated or assessed as part of the hydromorphological assessment. Nor has any rudimentary calculation to estimate the extent of the natural meander belt at this location been included that might provide an introductory basis for such a proposal. The daylight assessment report shows the Camac to be receiving very little light in the current proposals with the proposed building layout, walkways, etc.. The findings of the daylight assessment have not been integrated into the HQTA report. The impact of this on the naturalness of the proposed restored habitats and vegetation hasn't been assessed either in the HQTA report or in the landscaping report. The flood risk assessment does not assess the impacts of the proposed "daylighting" and re-profiling of the Camac river channel and possible changes to hydrology. The HQTA is unclear on this topic. The situation regarding sediment and erosion has not been assessed either in the existing scenario or the proposed. The drawings and sections show abutments in the riparian zone and/or proposed new riverbank. The proposed designs do not appear to be in compliance with the policies and objectives in the DCDP that relate to river corridor management and no solid evidence has been provided in support of the submitted proposals from a hydromorphological perspective.	**respectively) would allow transport and deposition of different size of sediments for the mean and dry weather condition.** **Refer to the HQTA report for further details.**
b)	**Flood Risk Assessment Report:**	

	The FRA should be revised to address appropriately all potential sources of flood risk. Proposed daylighting of the culvert is not adequately dealt with and there is no reference to potential culvert blockage nor the possible impacts caused by the proposed obstructions (piers, walkway columns, etc.) in the river channel. It is not clear if climate change allowances have been incorporated into the report.	**A *Flood Risk Assessment Report* prepared by Barrett Mahony Consulting Engineers is enclosed. The *Flood Risk Assessment* considers all potential sources of flood risk, including the potential impacts related to the daylighting of the River Camac culvert. An open channel flow analysis has been carried out, and considers the flows provided in the CFRAMS maps for the River Camac for the 10%, 1% and 0.1% AEP storm events. The flow analysis demonstrates that flood waters will be contained within the riparian zone to the sides of the daylighted culvert and will not pose a significant flood risk to the development.** **Potential blockage of the culvert has also been considered, and it has been demonstrated that the open channel within the site can adequately contain the increased flood levels which would occur as a result of a significant blockage of the culvert cross section. As outlined in the *Flood Risk Assessment*, and also in the *Civil Engineering Infrastructure & Surface Water Management Report* by Barrett Mahony, climate change allowances have been incorporated into all pipe and channel designs.**
c)	**Civil Engineering Infrastructure & Surface Water Management Report:**	
	Further detail is required including: • A breakdown of each roof area contributing to the areas listed in the Report & clarify flow control provision. • Clarity re: areas of green roof vs paving over "Blue Roof" area. • Attenuation storage provision: query required vs provided (over-provision?). • Does SI support proposed infiltration? Further information required. • Culvert proposal: no reference made to security/trash screen provision; future access & maintenance proposals for culvert & proposed channel should also be advised; clarify proposed river channel dimensions.	**The following drawings and reports have been prepared by Barrett Mahony Consulting Engineers:** • **The breakdown of the various roof areas is included in Table 1 of the *Civil Engineering Infrastructure and Surface Water Management Report*. The flow control provision from the two blue roof areas is discussed in Section 2.6.2.2 of the Report, and details of the typical flow control arrangement is included on drawing No. GWH-BMD-ZZ-XX-DR-C-12310.** • **The areas of extensive and intensive green roof, blue roof and paved areas are included on Table 1 of the *Civil Engineering Infrastructure and Surface Water Management Report*, and also shown on drawing No. GWH-BMD-ZZ-XX-DR-C-1002.**

	• Climate change: unclear if allowance has been included (as per FRA comment). • Model: query re: storage provision nodes & infrastructure location – drawing required. • Taking in Charge: clarify position with respect to current and future arrangements.	• **The attenuation storage provision is described in Section 2.6.2.2. of the *Civil Engineering Infrastructure and Surface Water Management Report*, along with supporting Flow calculations in Appendix II of the Report.** • **The ground conditions which are present on site are described in Section 2.2 of the *Civil Engineering Infrastructure and Surface Water Management Report*, and the full geotechnical investigation report is included in Appendix I of the *Basement Impact Assessment*. As noted in Section 5.4 of the geotechnical investigation report "*Infiltration rates of f=5.974 x 10-5 m/s were calculated for the soakaway location AS02. At the location of SA09 the water dropped too slowly to allow calculation of 'f' the soil infiltration rate. These locations are therefore not recommended as suitable for soakaway design and construction*."** • **Details relating to the proposed daylighting of the culvert, including consideration of a screen, maintenance etc, are included in Section 3 of the *Civil Engineering Infrastructure and Surface Water Management Report*.** • **As outlined in the *Civil Engineering Infrastructure & Surface Water Management Report*, and also in the *Flood Risk Assessment*, climate change allowances have been incorporated into all pipe and channel designs, in accordance with the DCC Development Plan requirements.** • **The Flow design analysis of the surface water system is included in Appendix II of the *Civil Engineering Infrastructure & Surface Water Management Report*, and the nodes match the layout shown on drawing No. GWH-BMD-ZZ-XX-DR-C-1000.** • **The areas which are proposed to be Taken in Charge by Dublin City Council are indicated on drawing No. GWH-BMD-ZZ-XX-DR-C-1007.**
d)	**Drawings:**	
	• Proposed SuDS Layout drawings: areas for each component/part should be shown on the drawings.	**The following drawings and reports have been prepared by Barrett Mahony Consulting Engineers:**

	• Culvert: further detail required re: excavation depths, tie-in details, screens, dimensions, etc. • Details required of proposed surface water discharge connection to the Camac. • Query location of SW and Foul MH's in relation to the existing culvert & culvert not shown on longitudinal sections. • Taking in Charge: drawing to be provided of areas to be maintained by DCC (see note above).	**The proposed layout for the SuDS measures in the development are shown on drawing Nos. GWH-BMD-ZZ-XX-DR-C-1002 and GWH-BMD-ZZ-XX-DR-C-1003.** **Details relating to the proposed daylighting of the culvert are included in Section 3 of the *Civil Engineering Infrastructure and Surface Water Management Report*. Proposed methodology for the daylighting is shown on drawing Nos. GWH-BMD-ZZ-XX-DR-C-1005, GWH-BMD-ZZ-XX-DR-C-1013 and GWH-BMD-ZZ-XX-DR-C-1014.** **The proposed surface water discharge connection to the River Camac is shown on drawing No. GWH-BMD-ZZ-XX-DR-C-1150.** • **The culvert is shown on the drainage long section drawings GWH-BMD-ZZ-XX-DR-C-1121 and GWH-BMD-ZZ-XX-DR-C-1122. The proposed positions of the surface water and foul manholes relative to the culvert are shown on drawing GWH-BMD-ZZ-XX-DR-C-1000. No manholes are proposed to be constructed directly over the line of the culvert.** • **The areas which are proposed to be Taken in Charge by Dublin City Council are indicated on drawing GWH-BMD-ZZ-XX-DR-C-1007.**
e)	**Basement Impact Assessment (BIA):**	
	No BIA was submitted with the Stage 2 submission. As per DCC policy, the BIA is a requirement for any development that includes a basement.	**A *Basement Impact Assessment Report* prepared by Barrett Mahony Consulting Engineers has been enclosed with the application.**
f)	**Drainage Planning Consultation**	
	Consultation with Drainage Planning is recommended prior to lodgement of any planning application.	**A meeting was held on 1st August 2023 with Niamh Fitzgerald and Mary-Liz Walshe of Dublin City Council in relation to aspects of the drainage design and the proposed daylighting of the culverted River Camac through the site.**
g)	**EIA Screening Report**	
	The EIA Screening Report may need expanding on to cover the proposed de-culverting in greater depth.	**The *EIA Screening Report* has been updated to include the effects associated with the de-culverting and daylighting of the River Camac. This is commented on**

		sections within the flood risk, contamination, and biodiversity sections of the EIA Screening Report.
8. Transport		
	Location	
	The subject site is located on the southern side of the Naas Road. The site is located approximately 6 km south west of the city centre. It is well served by public transport as it is located approximately 150 m from the Luas Red Line stop at Bluebell and from bus routes operating along Naas Road. BusConnects Liffey Valley to City Centre Core Bus Corridor proposals for Naas Road and Walkinstown Avenue to the west are noted. The existing cycle network is disconnected and there is no cycle path provision along Naas Road. The Naas Road to Inchicore Active Travel route is noted, no design details are available at the time of writing. The applicant shall liaise with this division, regarding potential changes to the public verge and footpath to the front of the site to facilitate this cycle route. Section 2 of the Planning Report and the Residential Travel Plan are noted. Apart from the assumed modal split for trips to college by students (51% public transport and taxis, 30% cycle, 15% walk, 3% private car, 1% car passenger) limited details on the travel patterns of the students have been provided; the destinations, routes, journey times time have not been detailed. The assumption of 45% active travel modal split has not been supported by evidence. This division has serious concerns regarding the proposed density of students at this location as it has not been demonstrated that the available public transport and active travel facilities can support the travel patterns required for full engagement in student life; the applicant should be required to: provide details on the anticipated travel patterns of the students to various locations which meet their educational, social,	• **Discussions were held with the Transportation Planning Division at Dublin City Council in relation to the proposed changes to the public verge and footpath along the outbound carriageway of the Naas Road, to facilitate the Active Travel route. The proposed agreed arrangement is shown on drawing No. GWH-BMD-ZZ-XX-DR-C-1012 prepared by Barrett Mahony.** • **The predicted post-development travel patterns are discussed in Section 7 of the *Residential Travel Plan* prepared by Barrett Mahony Consulting Engineers. The anticipated model splits have been derived from a review of the TRICS database for similar type developments.** • **Drawings demonstrating the proposed routes, travel times etc for residents of the development travelling to third level institutions and other facilities are included in Appendix II of the *Residential Travel Plan*.** • **Cycling and Walking audits have been carried out by PMCE Consultants and are included with the application documentation. All accepted recommendations have been incorporated into the layout drawings.** • **A *Public Transport Capacity Study* by Derry O'Leary has been prepared and is included with the application documentation. The transport capacity study concludes that "*both tram and bus services showed very high levels of spare capacity in the morning peak period*."**

	amenity and health needs. To support this a drawing should be provided showing the proposed routes, modes, journey times – door to door, and as well as travel a peak times it should account for travel to activities at off peak times. Submit a cycling and walking audit of the proposed active travel routes, this includes routes where active travel is used to access public transport; update the Residential Travel Plan, using the output of the above as a basis; assumed modal splits should be updated and clearly justified; and provide a Public Transport Capacity Study based on the updated modal splits.	
	General Access (External)	
	Proposed vehicular access is off the Naas Road via The Carriglea Industrial Estate Access Road (Access Road) with pedestrian access proposed directly from the Naas Road as well as via the Access Road. Cyclist access is proposed directly off the Naas Road in the form of a ramp and shared pedestrian/cyclist surface and is also provide via the Access Road. The Access Road provides vehicular access to the permitted Concorde SHD (ABP 312218-21/DCCSHD0026/21) as well pedestrian and cycle access to the permitted Carriglea residential development (reg. ref. 4244/15 as amended, including ABP 311606-21, DCCSHD0022/21). A future pedestrian and cycle path connection associated with the Concorde development is noted; this future permitted connection will provide a link between Naas Road and Lansdowne Valley Park. Upgrades to the Naas Road/Muirfield Drive junction as per Condition 11, reg. reg. 4244/15 are noted, including the provision of a controlled pedestrian crossing providing access to Bluebell Luas Stop. A Road Safety Audit Stage 1 and 2 of the surrounding roads and all vehicular, pedestrian and cycle access proposals should be carried out, to	**A stage 1 Road Safety Audit report was prepared by PMCE Consultants and is included with the application documentation. The mitigation measures for the problems identified in the report have been incorporated into the layout drawings.** **[Note that a stage 2 Road Safety Audit only gets carried out following detailed design of a road scheme]**

	identify problems and associated mitigation measures. The applicant should demonstrate that suitable mitigation measures to address the identified problems will be implemented.	
	Naas Road Access	
	A controlled pedestrian crossing of the Access Road is permitted as part of Concorde SHD at Naas Road junction. This crossing is also required in order to facilitate pedestrian to/from the proposed development and should be included within any application. The cycle and pedestrian facilities at the junction with Naas Road are poor, an upgrade of the junction to facilitate the south-north connection for pedestrians/cyclists may be required to support the development; prior to submission the applicant should contact the Local Authority to agree potential upgrades, consultation with TII and the NTA will be required. The public footpath in front of the site on Naas Road is relatively narrow c. 2m, there is a landscaped strip between the public footpath and the site boundary. Bollards are placed between the footpath and the grass to prevent vehicles from illegally parking on the grass strip. Proposed changes to public footpath in front of the site on Naas Road are noted, these changes are located outside the red line boundary and requires further detail to be provided for review. There appears to be a diversion of the public footpath within the site and landscaping proposed along the road verge, this would not be acceptable. It should be noted, that pedestrians within the site should generally be directed towards the main road junctions (east and west), and as such access point onto the Naas Road footpath should be reviewed. A widening of the footpath may be acceptable, however this as noted above should be reviewed in terms of cycle lane proposals coming forward on Naas Road. The proposed cycle ramp off the Naas Road and associate changes to the footpath, including a shared pedestrian and cyclist surface, are also	**A controlled pedestrian crossing off the Access Road, along with further upgrades of the road itself to include cycle lanes either side, are now included as part of the proposed development. The junction with the Naas Road has also been designed to include a waiting area for cyclists turning onto the Naas Road, as well as a smart micro detection system for cyclists to ensure they do not wait too long for a green light. The proposed details have been agreed with Dublin City Council Transportation Planning Division.** **The public footpath along Naas Road has been reconfigured to introduce a 1.5-metre-wide grass verge between the new public concrete path route and Naas Road. This grass verge provides a separation between vehicles and pedestrians and improves overall safety along this road for pedestrians. The verge can be later transformed into a cycling lane if required. Bollards are no longer required as the grass verge and kerb clearly signalise that this area is not a set down or parking place. The remaining existing grass lawn has been combined with the planters within the site to create berms as a further safety measure and allow large tree planting to contribute positively towards biodiversity enhancement contributions and greening strategy along this heavily trafficked road. The pedestrians are directed towards the main junctions through the spatial configuration of two straight pedestrian parallel routes (newly realigned public footpath and along the building elevation) with a few thresholds connecting the two paths. The openings between the planters are necessary landscape features and provide prospect and refuge to people walking along this area. The openings are visual corridors in and out of the development along Naas Road.** **The initially proposed cycle ramp off Naas Road has now been removed from the design proposal for this site. A new configuration of the public pathway and soft**

	noted, this division has concerns that this may lead to cyclist/pedestrian/vehicular conflict. There is currently no cycle lane in this location and cyclists should not be encouraged do dismount within the carriageway or to access the footpath at speed. Cyclist should be directed to the road junctions. As above, a RSA is required. Prior to submission, the applicant should consult with the Environment and Transportation Department to provide details and agree in principle any works to the public domain and obtain a letter of consent for such works to be included within the redline boundary. Areas proposed to be taken in charge should be clarified.	**landscape is proposed to facilitate the possibility of a future cycle lane along Naas Road.** **As part of the development, it is proposed to construct a new pedestrian crossing of the Naas Road and Luas tracks. This will involve new signal-controlled crossings of the inbound and outbound carriageways of the Naas Road, and an uncontrolled crossing of the Luas tracks, with the appropriate facilities for vulnerable road users. The new crossing will facilitate students of the proposed accommodation and members of the public who will be looking to utilise public transport from the north side of the Naas Road. It will also provide better pedestrian linkages for residents to travelling north from the development.** **The areas which are proposed to be taken in charge by Dublin City Council are indicated on drawing No. GWH-BMD-ZZ-XX-DR-C-1007 by Barrett Mahony. All such areas will be constructed in accordance with the Dublin City Council's 'Construction Standards for Road and Street Works in Dublin City Council' document.**
	Carriglea Industrial Estate Access Road	
	The Access Road is a private road, it is partially shown within the blue line boundary. The applicant should be requested to clarify the extent of their ownership and to include this within the redline boundary and for upgrades to be included within the application boundary. There is footpath provision along both the eastern side of the Access Road, in front of the site. There is no provision of street lighting. The Access road provides the main vehicular access to the proposed development, as well as pedestrian and cyclist access. Proposed Changes to footpath in front of the site are noted, the proposed landscaping appears to obstruct pedestrians. A clear and straight route for pedestrians should be provided, the footpath width should be provided in line with DMURS. The proposed layby on the road is noted, the turning facilities for the layby are unclear these should be clarified.	**The extent of the Applicants ownership is now clearly shown by the blue line on the site and road layout drawings, and the area which is proposed to be taken in charge is shown on the Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1007. The proposed street lighting provision is shown on Delap & Wallers site lighting drawing.** **A widened footpath along the Naas Road outbound carriageway is proposed, as agreed with Dublin City Council Transportation Planning Division.** **In relation to vehicles using the lay-by, such vehicles will be able to use the turning facilities which have been provided within the development.** **Parking and servicing arrangements for the proposed development will be controlled by the development management company, for areas which are not proposed to be taken in charge. Please refer to the *Parking Management Plan* by**

	There are currently double yellow lines on the carriageway in front of the site, the applicant should clarify how overspill parking associated and servicing activities associated with the proposed development will be prevented; noting this is a private road and there will be no public enforcement. The aforementioned adjacent SHDs have permitted access off the Access Road, the applicant should liaise with the owners/developers of the SHDs to provide a unified approach to the access arrangements on the road and any upgrades required. Upgrades should be in line with the Design Manual for Urban Roads and Streets (2019). A plan should be provided demonstrating the unified approach, showing clear pedestrian and cycling linkages between the sites as well as lighting, line markings and signage etc. Any taking in charge proposals should be detailed.	**Barrett Mahony Consulting Engineers and the *Outline Delivery and Servicing Management Plan* by AWN Consulting.** **Consideration was given to the adjacent SHD developments. The Carriglea Residential Development is well underway and due for completion in 2024. No works have commenced on the Concorde development at this point, and it is not clear what the intentions are for this development. Access to the Carriglea development for vehicles is via Muirfield Drive located to the east of the Gowan House site, with pedestrian and cyclist access provided from both Muirfield Drive and from the Gowan House access road. The upgraded access road, including cycle lanes, footpath and site lighting, will benefit the cyclist and pedestrian users of the Carriglea development by providing safe and useable infrastructure, connecting people to the Naas Road. There are two proposed access points to the Concorde development along the Gowan House access road. Vehicles and cyclists accessing the Concorde site will use the upgraded access road to enter and leave that development. It is proposed that the new cycle lanes along the access road will tie into the new cycling infrastructure which is proposed as part of the Concorde development. This will provide greater connectivity for cyclists from the adjacent site.**
	General Access (Internal Road)	
	The junction with the Access Road should be pedestrian priority. Clarity is required on measures to prevent general vehicular access via the emergency entrance. The internal road appears to be shared surface, but clarification required. Submitted auto tracking for refuse, fire engine and cars noted. Sightlines not provided.	**A warning ramp has been introduced at the junction with the Access Road as a measure to enforce pedestrian priority. Tactile paving is also provided as a warning measure to visually impaired people. Please refer to Stephen Diamond Associates' ground floor landscape masterplan (drawing No. 22-579-SDA-PD-DR-GF-001) showing shared surface areas and warning measures.** **Autotracking layouts for cars, refuse vehicles and fire tenders are included on drawing Nos. GWH-BMD-ZZ-XX-DR-C-1040 and GWH-BMD-ZZ-XX-DR-C-1041 by Barrett Mahony. The sightlines from the site access junction are indicated on the drawing No. GWH-BMD-ZZ-XX-DR-C-1004 by Barrett Mahony.**
	Cycle Parking	

	The site is located in Zone 2 of Map J of the Development Plan. Appendix 5, Table 1 sets out cycle parking standards for: student accommodation of 1 no. cycle space per bedroom and 1 visitor space per 5 no. bedrooms; retail of 1 per 5 staff 1 per 100 sq.m. Gross Floor Area (GFA); and cultural and community uses of 1 per 5 staff 1 per 100 sq.m. GFA. The total proposed cycle parking is 1198 no. spaces. 980 no. secure resident spaces are provided and 196 no. visitor spaces. 5 no. retail spaces are proposed and 17 no. cultural and community use spaces. The secure parking is provided in a two level store with an internal ramp for accessing the upper level, located on the western side of the development. Visitor parking is located across the development in the form of Sheffield stands. The location of the visitor cycle parking is generally acceptable, however it is noted there is cycle parking located in front of the entrance to Block 1, this should be relocated. As per the Appendix 5, Section 2.5 of the Development Plan, where large bicycle stores are proposed i.e. in excess of 100 spaces in a single store, consideration shall be given at an early design stage to providing additional measures within these stores where further segregation of bicycle storage could occur e.g. provision of bicycle cages that would hold a smaller number of bicycles and could be effectively numbered/labelled for ease of use. This would provide a greater sense of security to students parking their bicycles in the store. Specification of bicycle parking stands, including the double stacked cycle stands and cargo bike stands, should be provided to demonstrate sufficient operating space is allocated for use. The provision of non-standard cycle spaces cargo/accessible and electric bike charging is noted in the Residential Travel Plan, however, none are shown on submitted drawings. The applicant should clarify the location	**The proposed bicycle parking numbers are detailed in Section 2.2 of the *Residential Travel Plan* by Barrett Mahony. A total of 1,159 No. spaces are being provided in the development, whereby 941 No. of which are being provided for the students of the accommodation in a secure bicycle store located at ground and lower ground floor of Block 1. The layout of the bicycle store has been designed to include a number of smaller segregated spaces as advised in the *Development Plan*. The bicycle store has been set out on the basis of using double stacked cycle stands, and also includes space provision for electric and cargo bicycles.** **The external bicycle parking layout has been reviewed and bicycle stands have been relocated. None of the stands obstructs any doorways.** **There are also 3 No. spaces provided internally for staff of the retail, cultural and communal spaces.**

	of non-standard cycle spaces cargo/accessible and electric bike charging spaces.	
	Car Parking	
	The site is located in Zone 2 of Map J of the Development Plan. Appendix 5, Table 2 sets out maximum car parking standards for: student accommodation of 1 no. per 20 bedrooms; retail of 1 no. per 275 sq.m. Gross Floor Area (GFA); and cultural and community uses of 1 per 275 sq.m GFA. Maximum car parking, would equate to 55 no. space, broken down to 49 no. student, 1 no. retail and 5 no. cultural and community uses. A total of 7 no. no car parking space are proposed, the RTP reports that 2 no., 2 no. and 3 no. will be allocated to retail, cultural and community uses, and students, respectively. The rational for the proposed car parking is not clear. Submitted Residential Travel Plan assumes modal split of 3% commuting by car equating to 30 no. car parking spaces which indicates the proposed quantum of car parking is insufficient and may lead to overspill parking; the applicant is requested to review the proposed parking and address this discrepancy. The applicant should provide a parking management plan, clarifying how the parking space will be managed. The maximum car parking standards for summer short term letting (closest equivalent hotel use, 1 per 3 bedrooms) are 335 spaces. Limited details on the proposed short term letting use have been provided, i.e. the staff numbers, servicing requirements etc. A Mobility Management Plan should be submitted, clarifying modal split and requirement for parking and set down areas. No swept path analysis shown for the small van and car turning area in the west of the development has been provided.	**The predicted post-development travel patterns are discussed in Section 7 of the *Residential Travel Plan* by Barrett Mahony. The updated model splits have been derived from a review of the TRICS database for similar type developments, and also taking consideration of the limited car parking provision on the site. A *Car & Bicycle Parking Management Plan* by Barrett Mahony is included with the application documentation.** **In terms of summer lets, it is the intention that the development will be available to students that require accommodation over the holiday periods only e.g. language students coming over for the summer months. The development will not operate as a normal hotel during these periods. Staff, servicing and parking arrangements will be the same during these periods as outlined for normal operations.** **The swept path analysis is indicated on Barrett Mahony drawing Nos. GWH-BMD-ZZ-XX-DR-C-1040 and GWH-BMD-ZZ-XX-DR-C-1041.**

	Traffic Impact	
	No assessment submitted, it is not clear if the proposed development in combination with permitted development will have an unacceptable impact on the Naas Road junction. Any consideration of traffic generation should have regard to service/delivery/drop-off trips likely to be generated by the proposed development.	**A *Traffic Assessment Report* prepared by Barrett Mahony Consulting Engineers is included with the application documentation, and demonstrates that the proposed development will have an insignificant impact on the local road network.**
	Servicing	
	The Outline Delivery and Service Management Plan is noted, the content of the report is generally acceptable. It is noted that the report has not addressed the short term summer letting, the report should be update to include the short term summer letting.	**The *Outline Delivery and Service Management Plan* by AWN Consulting provides details of the deliveries and servicing of the development during the summer months. It is envisaged that over the summer period the traditional student term residents will vacate the premises and it would be the intention to accommodation summer language students during this time. This would be the same principal use as the normal student term and would mean there would be no projected changes to the proposed deliveries and servicing of the development.**
	Construction Management	
	No Construction Management Plan was submitted. Two technical notes were provided - Operational Waste Management Plan; and Construction Environmental Management Plan. Limited detail is provided in the technical notes, it is noted that reports will be issued at application stage. It is recommended that a preliminary construction management plan is submitted. This plan shall provide details of intended construction practice for the development, including traffic management, hours of working, noise management measures and off-site disposal of construction/demolition waste.	**A *Construction & Environmental Management Plan* by AWN Consulting is submitted as part of the proposed application. This Plan provides details of intended construction practice for the development, including traffic management, hours of working, noise management measures and off-site disposal of construction/demolition waste.**

	This division has serious concerns regarding the proposed density of students at this location as it has not been demonstrated that the available public transport and active travel facilities can support the travel patterns required for full engagement in student life. Furthermore, the details included in the submission for works within the public road are insufficient, in order to assess the connectivity of the site. As such, the following items are required to be addressed prior to an application can be lodged:	
i.	The applicant is required to:	
a)	Provide details on the anticipated travel patterns of the students to various locations which meet their educational, social, amenity and health needs. To support this a drawing should be provided showing the proposed routes, modes, journey times – door to door, and as well as travel a peak times should account for travel to activities at off peak times.	**Drawings demonstrating the proposed routes, travel times etc for residents of the development travelling to third level institutions and other facilities are included in Appendix II of the *Residential Travel Plan* prepared by Barrett Mahony.**
b)	Submit a cycling and walking audit of the proposed active travel routes, this includes routes where active travel is used to access public transport.	**Cycling and walking audits have been carried out by PMCE Consulting and are included with the application documentation. All accepted recommendations have been incorporated into the layout drawings.**
c)	Update the Residential Travel Plan, using the output of item i. a) and i. b) as a basis; assumed modal splits should be updated and clearly justified.	**The *Residential Travel Plan* has been updated. The predicted post-development travel patterns are discussed in Section 7 of the *Residential Travel Plan*. The anticipated model splits have been derived from a review of the TRICS database for similar type developments.**
d)	Provide a Public Transport Capacity Study based on the updated modal splits.	**A *Public Transport Capacity Study* prepared by Derry O'Leary is enclosed.**
ii.	The applicant shall provide detail on works proposed within the public road in order to improve the pedestrian / cycle connectivity of the site in	**The proposed changes to the public verge and footpath along the outbound carriageway of the Naas Road, to facilitate the Active Travel route are shown on the**

	an east-west direction, and is required to contact the Transportation Planning Division to discuss any proposed changes to public road / footpath, where applicable these works are to be discussed in consultation with the TII/NIA.	**Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1012. The details have been reviewed and agreed with the Dublin City Council's Transportation Planning Division.**
a)	A controlled pedestrian crossing of the Access Road at the Naas Road junction shall be provided (east-west connection, similar to that permitted for the adjacent Concord development).	**A controlled pedestrian crossing of the Access Road, along with further upgrades of the road itself to include cycle lanes either side, are now included as part of the proposed development. The proposed details are shown on Barrett Mahony drawing GWH-BMD-ZZ-XX-DR-C-1012.**
b)	The applicant is required to explore the provision of a controlled pedestrian crossing of the Naas Road and the Luas line at the junction (a south-north) connection.	**Discussions have taken place with the Dublin City Council's Transportation Planning Division in relation to a controlled pedestrian of the Naas Road and Luas Line. The proposed details are shown on Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1012.**
c)	Any changes to existing public footpath provision should also be clearly detailed.	**The proposed changes to the public footpath are shown on Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1012.**
d)	The proposed cycle ramp off the Naas Road raises traffic safety concern, potential for cyclist/pedestrian/vehicular conflict. Cyclist should be routed to the Carriglea Access Road junction.	**The previously indicated cycle ramp has been omitted. Cyclists will now be routed to the Carriglea Access Road junction.**
e)	A Road Safety Audit is required for works proposed to the public road and should be provided with any proposals.	**A stage 1 Road Safety Audit report was prepared by PMCE Consultants, and is included with the application documentation. The mitigation measures for the problems identified in the report have been incorporated into the layout drawings.**
f)	All works proposed within public road should be agreed in principle prior to the lodge of an application and subsequent to this, a letter of consent should be obtained from this division.	**All drawings indicating proposed changes to the public realm were submitted to Dublin City Council's Transportation Planning Division. A Letter of Consent for the works has since been obtained from Dublin City Council.**
	In addition, the following points should be comprehensively addressed within any forthcoming LRD application documentation:	
1.	**Naas Road**	

a)	In addition to the above, the connection between the proposed development and Naas Road for both pedestrians and cyclists should be reviewed, applying a filtered permeability design which routes pedestrians and cyclists towards the controlled junctions given the nature of Naas Road with the Luas line and heavy traffic.	**The pedestrians from the development are directed towards the main junctions through the spatial configuration of two straight pedestrian parallel routes (newly realigned public footpath and along the building elevation) with a few thresholds connecting the two paths. The openings between the planters are necessary landscape features and provide prospect and refuge to people walking along this area. The openings are visual corridors in and out of the development along Naas Road.**
2.	**Carriglea Industrial Estate Access Road:**	
a)	Carriglea Industrial Estate Access Road is partially inside the blue boundary, the applicant should clarify their extent of their ownership and include this within the redline boundary and demonstrate in the application that upgrades to facilitate the proposed development can be provided.	**The Applicant owns the access road to the west of the site, providing access for both the Concorde and Carriglea sites, with upgrade works proposed thereon. It thus falls within the red-line boundary.** **The proposed upgrade works to the access road are indicated on Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1011.**
b)	Changes to footpath in front of the site are noted, the proposed landscaping appears to obstruct pedestrians. A clear and straight route for pedestrians should be provided, the footpath width should be in line with DMURS.	**It is proposed that the footpath along the Naas Road will be widened to accommodate a potential future active travel route. The widened footpath will provide a clear, unobstructed route for pedestrians.** **The network of footpaths along the Carriglea interface has been designed to direct pedestrians towards the main shared surface on both sites to provide a safe, clear and straight route between the two sites. The form of the planters on the Gowan site have been designed to act as traffic control measures along the access road and remove the need for bollards on site.** **Tactile paving has been proposed where the pedestrian-only areas meet with shared surfaces to warn the visually impaired individuals of the possibility of oncoming vehicles in the area, to help them navigate the site safely and to comply**

		with DMURS. Kerbs have been introduced to distinguish between shared surfaces and pedestrian-only areas.
c)	The proposed layby on the road is noted, the turning facilities for the layby is unclear these should be clarified.	**Any vehicles using the lay-by along the access road will be able to use the turning facilities which have been provided within the development.**
d)	Upgrades to the road will be required including, but not limited to, lighting, improved pedestrian and cyclist facilities including connections with other adjacent granted developments.	**Upgrades to the pedestrian and cyclist facilities along the access road, including interaction and connections with the adjacent permitted developments, are shown on Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1011.**
e)	A Road Safety Audit should be carried out to identify issues and mitigation measures.	**A stage 1 Road Safety Audit report was prepared by PMCE Consultants, and is included with the application documentation. The mitigation measures for the problems identified in the report have been incorporated into the layout drawings.**
f)	The applicant should liaise with the other adjacent permitted developments which have permitted access off the road to provide a unified approach to the access arrangements on the road. A plan should be provided demonstrating the unified approach, showing clear pedestrian and cycling linkages between the sites.	**Access to the Carriglea development for vehicles is via Muirfield Drive, with pedestrian and cyclist access provided from both Muirfield Drive and from the Gowan House access road. The upgraded access road, including cycle lanes, footpath and site lighting, will benefit the cyclist and pedestrian users of the Carriglea development, providing safe and accessible routes onto and from the Naas Road, thus increasing permeability in the area. There are two proposed access points to the Concorde development along the access road. Vehicles and cyclists accessing the Concorde site will use the upgraded access road to enter and leave that development. It is proposed that the new cycle lanes along the access road will tie into the new cycling infrastructure which is proposed as part of the Concorde development. This will provide greater connectivity for cyclists from the three adjacent sites.** **The linkages between the proposed development and the two adjacent permitted developments are shown on Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1011.**

g)	Any taking in charge proposals should be detailed.	**The area which is proposed to be taken in charge is shown on Barrett Mahony drawing No. GWH-BMD-ZZ-XX-DR-C-1007. All works in this area will be carried out in accordance with the Dublin City Council's 'Construction Standards for Road and Street Works in Dublin City Council' document.**
h)	There are currently double yellow lines on the carriageway in front of the site, the applicant should clarify how overspill parking and servicing activities will be prevented/managed, given this is a private road.	**It is proposed that the access road will be taken in charge by Dublin City Council, at which point enforcement of the proposed parking arrangements on the road will be a matter for Dublin City Council. Before that, the parking and access arrangements within the site will be controlled by the management company, as outlined in the Barrett Mahony *Parking Management Plan* and the AWN *Outline Delivery and Servicing Management Plan*.**
3.	**Internal Access Road**	
	Internal access road, the junction with the Access Road should be pedestrian priority. The internal road appears to be shared surface, but clarification required. Clarity required on measures to prevent general vehicular access via the emergency entrance.	**A warning ramp has been introduced at the junction with the access road as a measure to enforce pedestrian priority. Tactile paving is also provided as a warning measure to visually impaired people.** **Please refer to the diagram on Stephen Diamond Associates drawing No. 22-579-SDA-PD-XX-302 showing shared surface areas and the Landscape Masterplan on drawing No. 22-579-SDA-PD-GF-001 showing warning measures such as blister tactile paving.** **There is no emergency vehicle entrance proposed in the development.**
4.	**Local Road Network**	
	The impact of the proposed development, in combination with permitted development, on the Naas Road junction is not clear. Assessment of the likely impact of the development on the local road network should be considered, regard should be had to service/delivery/drop-off trips likely to be generated by the proposed development.	**A *Traffic Assessment Report* by Barrett Mahony Consulting Engineers is included with the application documentation.**
5.	**Cycle Parking**	

a)	Cycle routes within the site are unclear, cyclist should be guided to/from the Carriglea Industrial Estate Access road so they can join the Naas Road in either direction at the junction.	**As part of the proposed upgrade works to the access road, new cycle lanes are proposed, along with a cyclist waiting area at the junction with the Naas Road. A smart micro detection system for cyclists is also proposed to ensure they do not have excessive wait times to join the Naas Road.**
b)	The provision of non-standard cycle spaces cargo/accessible and electric bike charging is noted in the Residential Travel Plan, however, none shown on plans. The applicant should clarify the location of non-standard cycle spaces cargo/accessible and electric bike charging spaces.	**The electric and cargo/ accessible bike spaces are now included in the internal cycle storage.**
c)	One large two-storey cycle store is proposed providing 984 cycle spaces, the applicant should consider further segregation as recommended in the development plan for stores in excess of 100 spaces.	**Further segregation to the cycle storage is provided.**
d)	Specification of bicycle parking stands, particularly the double stacked cycle stands, should be provided to demonstrate sufficient operating space is allocated for use.	**Double stack stands specification for both regular and electric bikes have been provided.**
e)	The location of the visitor cycle parking is generally acceptable, however it is noted there is cycle parking located in front of the entrance to Block 1, this should be relocated.	**The external bicycle parking layout has been reviewed and bicycle stands have been relocated. None of the stands obstructs any doorways.**
6.	**Car Parking**	
a)	The rational for the proposed car parking is not clear. The applicant should provide a parking management plan, clarifying the proposed allocation of car parking.	**A *Car & Cycle Parking Management Plan* by Barrett Mahony Consulting Engineers is included with the application documentation.**
b)	Provision of 2 no. spaces for students is noted. Submitted Residential Travel Plan assumes modal split of 3% commuting by car equating to 30 no. car parking spaces indicate the proposed quantum of car parking is insufficient and may lead to overspill parking; the applicant is requested to review the proposed parking and address this discrepancy. *Note: that the response to Item I(above) may lead to an updated modal split and*	**It is considered that the limited parking provision is consistent with the mobility targets for the Greater Dublin area, and with the availability of good public transport facilities immediately adjacent to the site. The predicted post-development travel patterns are discussed in Section 7 of the *Residential Travel Plan*. The updated model splits have been derived from a review of the TRICS**

	increased reliance on the private car and associated modal split, it is considered that the current assumed 45% active travel has not been justified. The response should be updated accordingly.	**database for similar type developments, and also taking consideration of the limited car parking provision on the site.**
c)	The maximum development plan for summer short term letting (closest equivalent Hotel use) is 335 spaces. Limited details on the proposed use have been provided, i.e. the staff numbers, servicing requirements etc. A Mobility Management Plan should be submitted, clarifying modal split and requirement for parking and set down areas.	**In terms of summer lets, it is the intention that the development will be available to students that require accommodation over the holiday periods only e.g. language students coming over for the summer months. The development will not operate as a normal hotel during these periods. Staff, servicing and parking arrangements will be the same during these periods as outlined for normal operations.**
d)	54 no. accessible rooms are proposed, only 1 no. accessible space is proposed. The proposed use of this single space is unclear. The applicant should consider an increased provision of accessible spaces.	**Out of the 7 No. car parking spaces proposed, 2 No. parking spaces will be accessible parking spaces.**
e)	No swept path analysis shown for the small van and car turning area.	**The swept path analysis for vehicles accessing the development is indicated on Barrett Mahony drawing Nos. GWH-BMD-ZZ-XX-DR-C-1040 and GWH-BMD-ZZ-XX-DR-C-1041.**
7.	**Updates to Reports**	
	Submitted reports relevant to this division include the Planning Report & Statement of Consistency, Residential Travel Plan, Outline Delivery and Service Management Plan. The scope of these reports are generally acceptable, but should be updated as necessary to address the points outlined above. In addition to the above reports this division requires the following reports to be submitted at application stage: - Preliminary Construction Management Plan - Stage 1 & 2 Road Safety Audit - Walking and Cycling Audit - DMURS Statement of Consistency - Parking Management Plan - Cycle Parking Management Plan - Traffic Assessment	**All of the requested reports have been provided and/or updated to reflect the final scheme.**

	- Public Transport Demand Study - Operational Waste Management Plan - Construction Environmental Management Plan	
9. Conservation		
a)	The AHIA identifies the former dwelling on the north side of the Naas Road, known as 'Naisetra' (dated 1914) and the fact that it is a protected structure, RPS Ref. No. 5793 (RPS Vol. 4 2022-2028 DCDP). It is acknowledged that the protected structure is partially screened by some boundary planting to the Naas Road, which may reduce some of the potential visual impact from the development as proposed; however, this is not sufficiently clear. Therefore, it is recommended that a number of cross-section drawings be provided showing 'Naisetra', the planting (in winter time) to its Naas Road boundary, the lower planting (in winter) within the garden(s), and the full heights of both blocks within the development, together with an impact assessment of same by the conservation consultant as part of the AHIA.	**The Naisetra to the north of the site across the Naas Road is of architectural heritage value but there are several factors that lessen their sensitivity. This includes:** • **The character and quality of its existing townscape context, which is dominated by industrial and commercial use and transport infrastructure.** • **The separation and buffering from the site to Naisetra by the Naas Road corridor measuring c. 35 metres.** • **The enclosure of the protected structure by mature trees in its garden.** • **The protected structure is now in office use rather than dwelling.** **Naisetra is no longer a dwelling in a suburban environment, rather it is located within an evolving high density, mixed use urban centre. While the house itself warrants protection from change or harm, it is not sustainable that it determines the typology or scale of development in this location. In the 21st century urban environment, such juxtapositions of type, scale and architecture are not unusual and are in fact desirable in that they add character and visual interest.** **Nevertheless, efforts have been made to help screen the proposed development from Naisetra. Please refer to Section 12 on the drawing No. 22-579-SDA-PD-DR-XX-210 created by Stephen Diamond Associates which has been provided to illustrate the buffer planting on the Gowan site relative to existing vegetation within the Naisetra garden around the protected structure along Naas Road during winter.** **Existing evergreen planting provides a considerable level of screening between the proposed new development on the Gowan site and the Naisetra site.**

		Further screening will be provided by the proposed buffer planting consisting of large native evergreen trees and a scrub and ground cover layer of vegetation along Naas Road on site to mitigate any potential negative visual impact caused by the new development.
b)	The AHIA should also refer to Drimnagh Castle (RPS Ref. No. 4832) to the south-east of the subject site and to any potential impact of the proposed development on views from the castle or those from within its curtilage. It is acknowledged that there is some distance between the subject site, however, the height of the proposed development of up to 14 storeys within the middle of a large urban block requires consideration of potential impact on the amenities of and views from the historic castle and grounds.	**The AHIA has been updated and now refers to Drimnagh Castle and demonstrates no material impacts from the scheme. This is verified by the photomontages taken from Drimnagh Castel as detailed in the AHIA.**

2.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in Dublin City Council's Opinion. We trust that this document fully responds to all of the points raised by Dublin city Council in their Opinion and we submit that the proposed development represents the proper planning and sustainable development of this currently underutilised site.

Yours sincerely

Patricia Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning