



## PLANNING REPORT

### STRADBROOK ROAD SHD – INTEGRATED RETIREMENT COMMUNITY / SENIOR LIVING APARTMENT SCHEME

PROPOSED INTEGRATED RETIREMENT COMMUNITY / SENIOR-LIVING APARTMENT SCHEME AT STRADBROOK HOUSE, STRADBROOK ROAD, MOUNTASHTON, BLACKROCK, CO. DUBLIN.



*Image credit – Redline Studios*

#### PREPARED FOR:

##### TETRARCH RESIDENTIAL TD

Europa House  
2<sup>nd</sup> Floor Block 9  
Harcourt Centre  
Harcourt Street  
Dublin  
D02 WR20

#### PREPARED BY:

##### TOM PHILLIPS + ASSOCIATES

80 Harcourt Street  
Dublin 2  
D02 F449

**JULY 2022**

---



## Contents

|       |   |    |
|-------|---|----|
| 1.0   | INTRODUCTION .....  | 4  |
| 1.1   | Rationale for Development and Vision for the Subject Site ..... | 6  |
| 1.2   | Summary of Proposed Development.....                            | 6  |
| 1.3   | Key Design Information.....                                     | 7  |
| 1.4   | Design Team.....  | 7  |
| 1.5   | Purpose of this Report .....                                    | 7  |
| 2.0   | SUBJECT SITE – LOCATION, HISTORY AND CONSULTATION .....         | 8  |
| 2.1   | Site Location.....  | 8  |
| 2.1.2 | Existing Site – Stradbrook House .....                          | 9  |
| 2.2   | Planning History .....  | 9  |
| 2.2.1 | Subject Site – Stradbrook House, Stradbrook Road, Dublin .....  | 9  |
| 2.2.2 | Surrounding Area – Stradbrook Road and Environs .....           | 10 |
| 2.3   | Pre-Application Consultation .....                              | 11 |
| 2.3.1 | Pre-Application Consultation – Discussion and Results.....      | 11 |
| 3.0   | PROPOSED DEVELOPMENT .....                                      | 16 |
| 3.1   | Description of Development .....                                | 16 |
| 3.1.1 | Design.....   | 16 |
| 3.1.2 | Proposed Apartments .....                                       | 17 |
| 3.1.3 | Communal Areas and Facilities .....                             | 18 |
| 3.1.4 | Scheme Management – Integrated Retirement Communities.....      | 19 |
| 3.1.5 | Travel and Transport.....                                       | 20 |
| 3.1.5 | Drainage Systems, Water and Flooding.....                       | 23 |
| 3.2   | Development Statistics .....                                    | 24 |
| 4.0   | KEY PLANNING ISSUES FOR THE SUBJECT SITE .....                  | 25 |
| 4.1   | Policy Context .....  | 25 |
| 4.2   | Principle of Development .....                                  | 25 |
| 4.3   | Innovation Hub .....  | 26 |
| 4.4   | Employment Lands – ‘E’ Zoning Objective Designation.....        | 26 |
| 4.5   | Purpose-Built Senior Living Accommodation.....                  | 27 |
| 4.6   | Residential Density.....  | 29 |
| 4.7   | Building Height.....  | 29 |
| 4.8   | Relationship with Neighbouring Development.....                 | 29 |
| 4.9   | Sustainable Mobility.....                                       | 31 |
| 4.10  | Landscaping.....  | 32 |
| 4.11  | Ecology .....   | 32 |
| 4.12  | Engineering .....   | 32 |



---

|     |   |    |
|-----|---|----|
| 5.0 | DOCUMENTS SUBMITTED AS PART OF THIS APPLICATION ..... | 33 |
| 6.0 | CONCLUSION.....                                       | 38 |



## 1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants<sup>1</sup>, is instructed by Tetrarch Residential Limited<sup>2</sup> (the 'Applicant'), to submit this SHD Planning Application for the permission for the development of, *inter alia*, a residential scheme on lands known as 'Stradbrook House', Stradbrook Road, Mountashton, Blackrock, Co. Dublin, A94 X9A2 (the 'Subject Site').

The proposed development will contribute a strategically important residential typology to the local area, comprising 108 No. new professionally-managed homes, which – though suitable and adaptable for people on all stages of the life cycle – have been designed with the needs of senior citizens in mind.

The project Design Team, including MCA Architects<sup>3</sup> and Murray & Associates Landscape Architects<sup>4</sup>, has achieved a timeless and functional design that respects the Subject Site's unique context, achieving a high-quality and well-considered infill development.

As well as responding to an acute housing need, as detailed in Section 4.4 of this *Planning Report*, below, the proposed development will provide approximately 1,851 sqm of communal space which has been carefully designed to serve the needs of future residents of the scheme and visitors to the scheme, as well as respecting the residential amenities of the surrounding environment.

The proposed development also includes an element of non-residential uses, including a commercial / office unit (c. 175 sqm). Given the nature of the lands, located in a mature and established residential area, within the unique context of the Blackrock College RFC open space complex, and zoned 'Employment' under the relevant *Dún Laoghaire-Rathdown Development Plan 2022-2028* (the 'Development Plan'), it is considered that the Subject Site is well-suited to accommodate a high-quality, mixed-use scheme such as that proposed by the Applicant.

We note in this regard, the existing characteristics of the existing structure on the Subject Site, Stradbrook House, which has been substantially vacant for some 12 years. We submit that the Subject Site does not currently play an important role as an employment location. We refer to the *Stradbrook Road Extra Care Economic Benefits Assessment* and the *South Suburban Office Report*, both prepared by Savills, and submitted a part of this SHD Planning Application.

In this regard, the redevelopment of the Subject Site to provide for 108 No. serviced Build-to-Rent senior-living apartments is supported by a comprehensive Planning Application, and fully accounts for the provisions of the national, regional and local policy objectives related to the Subject Site. The Planning Application has been developed by a multidisciplinary project team, in consultation with the An Bord Pleanála and Dún Laoghaire-Rathdown County Council.

---

<sup>1</sup> 80 Harcourt street, Dublin 2, D02 F449.

<sup>2</sup> 2nd Floor Block 9, Harcourt Centre, Harcourt Street, Dublin, D02 WR20.

<sup>3</sup> Hanover Warf, 4 Asgard Road, Dublin 2, D02 X39.

<sup>4</sup> 16 The Seapoint Building, 44-45 Clontarf Road, Dublin 3, D03 RF63.





## 1.1 Rationale for Development and Vision for the Subject Site

The Applicant is seeking to make a significant positive contribution towards enabling the provision of housing in Dún Laoghaire-Rathdown. With regard to an observed need to provide appropriate housing solutions in the area, it is the Design Team's vision to provide a leading example of sustainable, adaptable living, and delivering a specialised tenure option that supports localised downsizing (or 'rightsizing'), whilst respecting the Subject Site's local context and providing a high quality infill development situated in the heart of an established, mature community. Further to this, the proposed development will assist in realising compact growth which promotes modal shift towards healthy, active and sustainable mobility.

Due to the design of the proposed development – which, though adaptable to all stages of the life cycle, has been designed very specifically with the needs of elderly households in mind and is based on well-established design principles that are becoming increasingly commonplace internationally – the proposed development will have a positive effect on housing distribution in the area and would vastly improve the range of housing stock in the area.

By providing attractive options for older people to downsize within their community, the Proposed development will bring the added benefit of enabling currently under-utilised housing stock in the local area become available to younger families.

*A Building Lifecycle Report and an Operational Waste Management Plan, as well as a Mobility Management Plan, are all included as part of this Planning Application to support the operation of the proposed building as a rental scheme as per the Design Standard for New Apartments – Guidelines for Planning Authorities (2020) (as amended) (the 'Apartment Design Guidelines'). Please see Section 3.1.4 of this Planning Report for further details.*

## 1.2 Summary of Proposed Development

The proposed mixed-use development at a site of some 0.4813 ha on Stradbrook Road, Mountashon, Blackrock, Co. Dublin will comprise the demolition of existing buildings and surface car park, and the construction of: 108 No. Build-to-Rent residential senior living apartments (83 No. 1-bed apartments and 25 No. 2-bed apartments), with balconies / winter gardens at all elevations, across 2 No. blocks ranging between 3 to 7-storeys with set back at sixth-floor level and additional basement storey.

The proposal also includes for 148 No. secure bicycle parking spaces, 55 No. underground car parking spaces, a two-way vehicular entrance ramp and bin storage, circulation areas and associated plant at basement level; a self-contained office unit, a residential staff management suite, resident's facilities, residents' communal amenity rooms, and residents' communal open space, as well as 13 No. surface car parking spaces (incl. 1 No. accessible commercial car parking space and 12 No. car parking spaces for use by the adjoining creche (incl. 1 No. accessible)), 24 No. secure cycle spaces within separate bike store, separate bin store for office use, 30 No. short-term bicycle parking spaces, and 3 No. ESB substations at ground floor level; additional communal amenity rooms at first, second, third, fourth and fifth-floor levels; roof gardens / terraces at third, fourth and sixth-floor levels; green roofs; and PV panels on third, fourth and sixth-floor roof-level; amendments to existing boundary wall to provide new vehicular and pedestrian entrances; provision of security gates; and associated site landscaping, lighting and servicing, and all associated works above and below ground.

We describe the proposed development in more detail below.

### 1.3 Key Design Information

**Table 1.1: Key Development Statistics**

| Development Statistic            | Proposed development  |
|----------------------------------|---|
| Site Area                        | 0.4813 ha   |
| No. of Residential Units         | 108 No.   |
| Gross Non-Residential Floorspace | 190.4 sqm   |
| Gross Residential Floorspace     | 12,547 sqm  |
| Residential Density              | 225 dph   |
| Plot Ratio                       | 2.1   |
| Site Coverage                    | 48%   |
| Height                           | 24.35 m to parapet level, with additional 1.25 m lift overrun   |
| Car Parking                      | 68 No. (55 No. residential (at basement level), 1 No. commercial (at surface level), and 12 No. for existing childcare facility (at surface level)) |

### 1.4 Design Team

This submission was prepared on behalf of the Applicant by the following expert Design Team:

**Table 1.2: Key Consultants of Project Team**

| Discipline                                 | Consultant                                 |
|--|--|
| Lead Architect                             | MCA  |
| Town Planning Consultant & GIS             | Tom Phillips + Associates                  |
| Engineer                                   | CS Consulting Group                        |
| Landscape Architect                        | Murray & Associates Landscape Architecture |
| Ecologist                                  | Altamar                                    |
| M&E Engineer                               | Renaissance                                |
| Traffic and Transport Consultant           | NRB Consulting Engineers                   |
| Daylight and Sunlight Consultant           | IN2  |
| Townscape and Visual Impact                | Modelworks                                 |
| Photomontages & CGIs                       | Redline Studios                            |
| Waste Consultant                           | AWN  |
| Residential Property Management Consultant | Altamar                                    |
| Commercial Property Management Consultant  | Savills                                    |
| Legal Opinion                              | McCann FitzGerald                          |

### 1.5 Purpose of this Report

This Planning Report sets out an overview of the proposed development, the site context from a locational, planning and environmental context and any relevant planning history. This Report also outlines the overall compliance of the proposed development with national, regional and local planning policy.

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

## 2.0 SUBJECT SITE – LOCATION, HISTORY AND CONSULTATION

### 2.1 Site Location

The Subject Site is located in the suburban area of Blackrock, approximately 8 km south of Dublin city centre, 1.6 km south west of Dún Laoghaire town centre, and some 700 m south east of Blackrock town centre. (See Figure 2.1.) The general area in the vicinity of the site is suburban in nature and is primarily in mature residential use.

The lands are located within the administrative development boundary of Dún Laoghaire-Rathdown County Council. The Subject Site is principally bounded by: Blackrock College RFC club buildings and pitches to the north east, a childcare facility to the north, residential development including Windsor Park estate to the south east, and Stradbrook Road and further residential development to the west.

The site is accessed from Stradbrook Road.

There are a number of Protected Structures in proximity to the Subject Site, including Rockhouse Manor and associated entrance gates (both RPS No. 1163). We note that Wyneberg House has been included as a candidate Protected Structure within the *Dún Laoghaire Rathdown County Development Plan 2022-2028* as RPS No. 2012.



Figure 2.1: Subject Site (outlined in red). (Source: Google Maps, June 2022.)

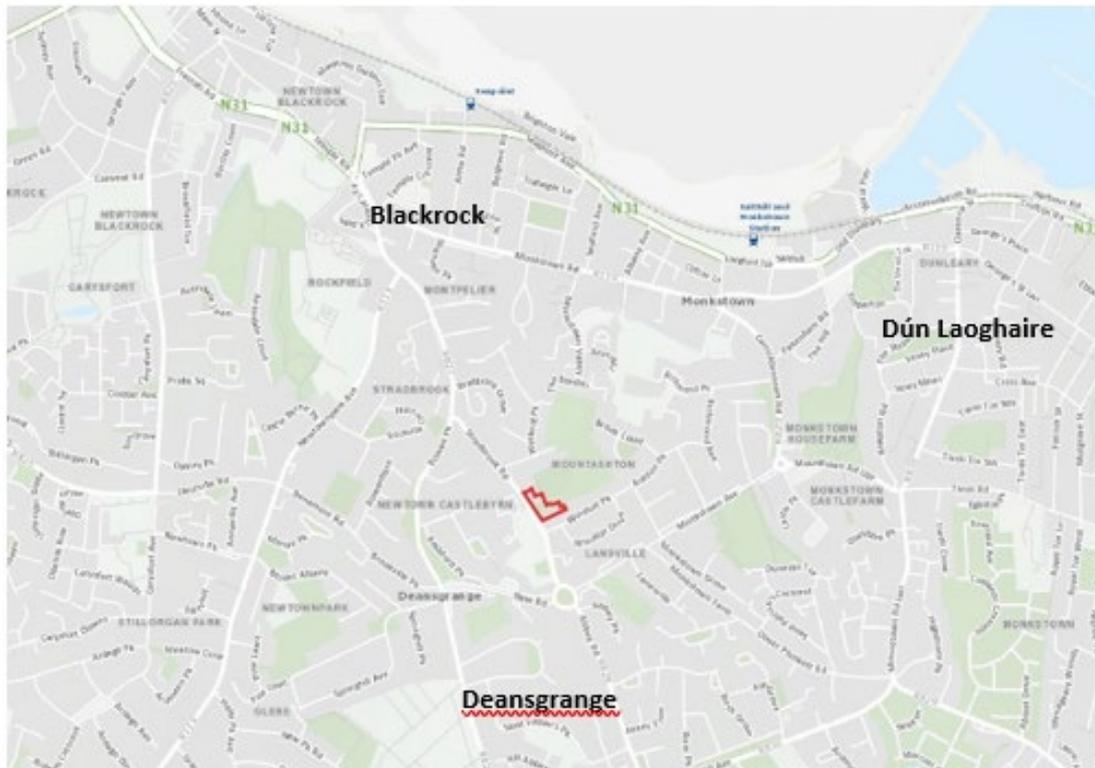


Figure 2.2: Subject Site (outlined in red). (Source: GeoHive, June 2022.)

### 2.1.2 Existing Site – Stradbroke House

The Subject Site currently accommodates ‘Stradbroke House’, a 2-storey, vacant office building, originally built in c. 1986. The building is a of plain red brick, and the site is characterised by car parking and limited non-native planting. The existing building is not a Protected Structure and is of limited design appeal.

The existing office building has not been substantially occupied for some 12 years.

The existing structure on the Subject Site, Stradbroke House, has been vacant a number of years. We submit that the Subject Site does not currently play an important role as an employment location. We refer to the *Economic Benefits Assessment* and the *South Suburban Office Report*, both prepared by Savills and submitted a part of this SHD Planning Application.

## 2.2 Planning History

### 2.2.1 Subject Site – Stradbroke House, Stradbroke Road, Dublin

The following section will detail the planning history of the site, relevant to this submission.

| Ref.     | Decision Date    | Description of Proposed Works                          | Note      |
|----------|------------------|--|-----------|
| 19A/0740 | 07 November 2019 | Change of use of the existing ground floor office unit | Withdrawn |

Table 3.1: Planning History, Subject Site



TPA conducted a review of recent planning applications relating to the Subject Site, and we note the following:

DLRCC Reg. Ref. 19A/0740 – Planning Application seeking permission for development comprising the change of use of the existing ground floor office unit at Stradbrook House, as well as minor alterations to Stradbrook House – WITHDRAWN.

- Planning Application was withdrawn on 1 November 2019.

## 2.2.2 Surrounding Area – Stradbrook Road and Environs

The following section will detail the planning history of the surrounding area, as relevant to this submission. The relevant planning applications relate to Somerset House, the building adjacent to the Subject Site.

| Ref.      | Decision Date   | Description of Proposed Works  | Note      |
|-----------|-----------------|--|-----------|
| D17A/0876 | 12 July 2017    | Modifications to permitted development (D12A/0142)   | Granted   |
| D12A/0142 | 12 July 2012    | Modifications to permitted development (D12A/0117)   | Granted   |
| D12A/0117 | 13 April 2012   | Change of use of first floor from office to creche, provision of play area at roof level, revisions to internal layout at ground floor level, revision of car parking layout | Withdrawn |
| D11A/0247 | 06 October 2011 | Change of use of first floor from office to creche, provision of play area, revisions to internal layout at ground floor level, revision of car parking layout               | Granted   |

**Table 3.2:** Planning History, Surrounding Sites

DLRCC Reg. Ref. D17A/0876 – Permission GRANTED for modifications to permitted development (see Reg. Ref. D12A/0142) including, *inter alia*, the construction of an escape stair structure, modifications to the permitted lift position and construction of associated extension, modifications to permitted roof-level play area, revisions to internal layout, and associated works.

- Planning permission granted on 21 November 2017.

DLRCC Reg. Ref. D12A/0142 – Permission GRANTED for modifications to permitted development (see Reg. Ref. D11A/0247) including, *inter alia*, change of use of first floor from office to creche, provision of play area at roof level, revisions to internal layout at ground floor level, revision of car parking layout, and proposed ancillary use of building as childcare staff training.



- Planning permission granted on 12 July 2012.

DLRCC Reg. Ref. D12A/0117 – Planning Application seeking, *inter alia*, change of use of first floor from office to creche, provision of play area at roof level, revisions to internal layout at ground floor level, revision of car parking layout, and associated works WITHDRAWN.

- Planning permission granted on 13 April 2012.

DLRCC Reg. Ref. D11A/0247 – Permission GRANTED for change of use from office to creche at ground floor, provision of an outdoor play area, revision of car parking area, and associated works.

- Planning permission granted on 6 October 2011.

## 2.3 Pre-Application Consultation

### 2.3.1 Pre-Application Consultation – Discussion and Results

A Pre-Application Consultation (ABP Ref. ABP-311879-21) took place on 10 March 2022.

Representatives from the Design Team, Dún Laoghaire-Rathdown County Council (DLRCC) and An Bord Pleanála (ABP) were present.

The following issues, also addressed within the ABP Opinion, were discussed:

#### 1. **Compliance with the Land Use Zoning** - Objective E:

ABP Comments:

- *“The documentation submitted with an applicant would need to demonstrate compliance with the zoning objective, SHD cannot contravene zoning.”*

We refer to the *Statement of Consistency*, prepared by Tom Phillips + Associates, submitted as part of this SHD Planning Application. That document confirms that the Proposed development complies with the objectives of the *Development Plan* with regards to land use zoning.

We also refer to the submitted *Legal Opinion*, which addresses the question of whether the Proposed development would constitute a material contravention of the *Development Plan* in relation to land use zoning, prepared by Brendan Slattery of McCann Fitzgerald LLP. That document concludes that:

*“where the proposed SHD would not accord with the relevant policies we agree that it is appropriate to address this as a possible material contravention of the development plan other than in relation to zoning.”*

- *“Any material contravention of other plan provisions would need to be advertised, described and justified in the manner set out in legislation.”*

We refer to the *Material Contravention Statement*, prepared by Tom Phillips + Associates, submitted as part of this SHD Planning Application.

2. **Design and Layout**, *inter alia*, height, scale and mass, development potential of adjoining sites. We also refer to, *inter alia*, the submitted *Architectural Design Statement* prepared by MCA Architects and the *Townscape and Visual Impact Assessment* prepared by Modelworks.

ABP comments:

- *“The height of the building along the Stradbrook road and the scale, bulk and mass as presented in the documentation.”*

In response to the Board’s concerns, the facade line of the proposed design has been amended to be in line with the adjacent house to the south of the Subject Site, with recess balconies omitted and replaced with projecting balconies to help reduce scale and mass on gable block.

- *“The position of the proposed building right up to the boundaries of the site and may impact on development of the adjoining sites.”*

In response to the Board’s concerns, the south west gable has been pushed back from boundary, with top floor of setback and reduced to provide 4/5 storey gable to boundary houses.

- *“The impact on the rugby club.”*



**Figure 2.3:** Proposed development viewed from the north east, across the Blackrock College RFC Clubhouse. (Source: MCA, July 2022.)

The impact on the adjacent Blackrock College RFC lands has been well considered. We refer to the Photomontages and CGIs, prepared by Redline Studios, as well as the *Architectural Design Statement* prepared by MCA Architects.

We note that exact landscaping details at the boundaries of the Subject Site and the Blackrock College RFC lands will be agreed post-planning stage, however it is not envisaged that there will be a hard boundary such as a fence or a wall, separating the sites. The proposed development will integrate seamlessly with the existing clubhouse and amenity lands.

3. **Impact on Residential Amenity**, *inter alia*, potential future occupants and existing residential properties

ABP comments:

- *“The impact of the balconies and the potential to overlook adjacent housing.”*

In relation to the impact of balconies, we refer to Section 3.4 of the *Architectural Design Statement*, prepared by MCA Architects and submitted as part of this SHD Planning Application.

The Design Team has responded to the Board’s concerns by providing privacy screens of 1800mm and 1200mm high, respectively, on the 3<sup>rd</sup> and 4<sup>th</sup> floor to prevent overlooking on the south side of the site.

This will ensure that roof garden users cannot look into the gardens of the existing houses on Windsor Park and their privacy will be respected and protected. Additionally, the southern edge of the site will be screened by a secondary wall, followed by a row of trees to protect the courtyard’s privacy and also for aesthetic reasons.

- *“The visual impact from the rear of the existing dwellings along Windsor Park.”*

We refer to the *Townscape and Visual Impact Assessment* prepared by Modelworks.

In relation to VP No. 7, which addresses the view from Windsor Park, that Assessment notes that proposed development, though still constituting a medium-negative impact from that particular view, has successfully mitigated undue negative visual impact since the Pre-Planning Consultation through the use of façade treatments and massing design:

*“The proposed apartment building will rise above and just beyond the series of two storey semi-detached dwellings that cross the view on the opposite side of Winsor Park.*

*The building terraces up in an appropriate transition of scale from the smaller residential dwellings to the fore. This terracing is emphasised by alternate dark and light façade treatments that also alternate between brick and metal cladding.*

*Together the varied built form and façade treatment help to break down the scale and massing of the proposed development so that it does not appear overbearing within the street scene or from the dwellings that back onto it. The design of the structure and placement of windows for the nearest elements avoids undue overlooking of these properties.”*

The Design Team has responded to the Board’s concerns by reducing the number of windows at gable ends and additional glazing to be opaque windows to help reduce overlooking onto adjoining houses.

- *“The supporting residential amenities in the proposal.”*

Details of the supporting residential amenities are provided in Section 3.1.3, below.

#### 4. Drainage

ABP comments:

- *“Prospective applicant to provide surface water calculations.”*

These are provided in Appendix D of the *Engineering Services Report* prepared by CS Consulting and submitted as part of this Planning Application.

#### 5. Traffic and Transport

ABP comments:

- *“Clarity was sought if Blackrock Rugby Club would still have use of carpark.”*

Blackrock College RFC will no longer have use of the existing car park, as that will have been demolished, but a separate planning application will be lodged by the Applicant in association with Blackrock College RFC for an alternative updated car parking facility.

That separate planning application for replacement Blackrock College RFC car parking will be submitted to DLRCC in Q3 2022.

- *“The public footpath should be maintained across the accesses to the development.”*

We note that the footpath has been maintained across all accesses. Refer to CS Consulting Dwg. No. 0015, ‘Proposed Road Plan Layout’.

- *“The proposal should be fully compliant with DMURS.”*

The proposed development complies with DMURS. We refer to Appendix G of the *Transportation Assessment Report* prepared by NRB Consulting and submitted as part of this Planning Application.

- *“The public transport provision to the site should be clearly detailed in any Material Contravention Statement.”*

We submit that the planned Blackrock to Merrion Core Bus Corridor begins c. 950 m from the Subject Site (see Figures 3.1 and 3.2, below)

As per the *Dún Laoghaire-Rathdown County Development Plan 2022-28*, increased residential density and height to provide for an increased range of housing options across the County, is permitted close to Core Bus Corridors. Please refer to the submitted *Statement of Consistency*, prepared by Tom Phillips + Associates.

As such, we note that the submitted *Material Contravention Statement*, prepared by Tom Phillips + Associates, does not include reference to public transport provision.

- *“Staffing proposals should be included within any transport studies.”*

It is considered that the parameters of the submitted Transportation Studies and the proposed car parking provision is adequate, given the location and characteristics of the proposed development. We refer to the submitted *Transportation Assessment Report*, and relevant attachments, prepared by NRB Consulting.

That report demonstrates that the operational stage of the proposed development will have an absolutely negligible impact upon the established local traffic conditions and can easily be accommodated on the road network without any capacity concerns arising.

NRB conclude that:

*“that there are no significant Operational Traffic Safety or Road Capacity issues, affecting the established road network, that prevent a positive determination of the application by An Bord Pleanála.”*

In relation to public transport, NRB Consulting’s *Bus / Dart Capacity Report* notes that the increased demand for bus seats resulting from the proposed development is substantially less than 1% of the total available 7-9 am seat capacity locally. This is considered negligible, and NRB believe it can easily be accommodated within the current service provision.

DLRCC comments:

- *“Ramp to underground parking must be a 1:14 gradient to accommodate cyclists.”*

We refer to MCA Dwg No. 1001, ‘*Basement Plan*’. The proposed ramp to the basement car park will be a 1:14 gradient.

Additional changes to the proposed scheme include the reconfiguration of access arrangements to Stradbroom Road.

We also refer to the *Response to An Bord Pleanála Opinion*, prepared by Tom Phillips + Associates and dated July 2022.

### 3.0 PROPOSED DEVELOPMENT

#### 3.1 Description of Development

As per the statutory notices, the proposed mixed-use development will comprise:

- The demolition of the existing Stradbrook House and adjoining surface car park; and
- The construction of: 108 No. Build-to-Rent residential senior living apartments (83 No. 1-bed apartments and 25 No. 2-bed apartments), with balconies / winter gardens provided for all units, across 2 No. blocks ranging between 3 to 7-storeys over basement with set back at sixth-floor level.

The proposal also includes for:

- 148 No. secure bicycle parking spaces, 55 No. underground car parking spaces, a two-way vehicular and cyclist entrance ramp, and bin storage, circulation areas and associated plant at basement level;
- A self-contained office unit, a residential staff management suite, resident's facilities, residents' communal amenity rooms, and residents' communal open space, as well as 13 No. surface car parking spaces (incl. 1 No. accessible commercial car parking space and 12 No. car parking spaces for use by the adjoining creche (incl. 1 No. accessible)), 24 No. secure cycle spaces within separate bike store, separate bin store for office use, 30 No. short-term bicycle parking spaces, and 3 No. ESB substations at ground floor level;
- Additional communal amenity rooms at first, second and third floor levels; roof gardens / terraces at third, fourth and sixth-floor levels; green roofs; and PV panels on third, fourth and sixth-floor roof-level; amendments to existing boundary wall to provide new vehicular and pedestrian entrances; provision of security gates; and
- Associated site landscaping, boundary treatments, lighting and servicing, and all associated works above and below ground.

We describe the proposed development in more detail below.

##### 3.1.1 Design

The proposed 'Build to Rent' apartment building will comprise 108 No. apartments across 2 No. blocks (Block A and Block B) which are between 3 and 7 storeys in height. The proposal includes for a number of communal rooftop terraces, communal amenities and facilities across a number of floors, and communal open spaces at ground floor.

The apartment building will be c. 24 m in height to parapet level, with a central (i.e., set back) core extending an additional 1.25 m above. The cores are located centrally within each of the proposed blocks, with a maximum of 12 No. apartments per floor within Block A and a maximum of 11 No. apartments per floor within Block B.

It is considered that the proposed height is appropriate, given the policies contained within the *Dún Laoghaire-Rathdown Development Plan 2022-28*, the pattern of planned



development surrounding the Subject Site, and the mitigation measures undertaken within the proposed development to successfully address any potential impacts on neighbouring amenities, including visual impact, potential overshadowing and perceived overlooking.

We refer to the *Architectural Design Statement*, the *Sunlight & Daylight Assessment* and the *Townscape and Visual Impact Assessment (TVIA)*, both submitted as part of this Planning Application.

The proposed design has been carefully considered by MCA Architects to reflect and complement the existing built environment at Stradbrook Road. The chosen material palette includes a selection of buff and grey bricks, brick reveal recesses, metal cladding, bronze anodised aluminium fins, and high quality aluminium balconies.

The chosen high-quality materials will provide a distinctive character to the scheme, adding variety and animation to the existing streetscape, while retaining some existing design features, such as the existing boundary wall.

### 3.1.2 Proposed Apartments

The proposed apartments comply with the standards set out in the *Apartment Design Guidelines* and the *Dún Laoghaire-Rathdown Development Plan 2022-28*. We refer to MCA's *Housing Quality Assessment* and *Schedule of Areas*, both submitted as part of this Planning Application.

There are 9 No. 1-bedroom apartment types proposed (Types 1BR-A1, 1BR-A2, 1BR-B1, 1BR-B2, 1BR-B3, 1BR-C1, 1BR-D1, 1BR-E1 and 1BR-F1). There are 8 No. 2-bedroom apartment types proposed (Types 2BR-A1, 2BR-A2, 2BR-B1, 2BR-B2, 2BR-B3, 2BR-C1, 1BR-C2, and 2BR-D1).

The apartments range between c. 50.3 sqm and c. 100.5 sqm in size, and each includes 1 – 2 No. double bedroom(s), a combined living / kitchen / dining area, a bathroom, storage areas, and private open space in the form of a balcony or a wintergarden.

The proposed apartments are generously laid-out, allowing for residents to personalise the interior. The proposed lay-outs also provide ample opportunity for adapting to suit specific needs.

The apartments will receive more than adequate levels of sunlight / daylight, and those apartments that are positioned close to the site boundary incorporate opaque glazing into their fenestration design in order to minimise potential overlooking. We refer to the *Sunlight & Daylight Assessment* and the *Architectural Design Statement*, both submitted as part of this Planning Application.

It is considered that the proposed apartment units will provide a high level of residential amenity for future residents. The apartments will be comfortable and functional, with high quality, durable materials used, ensuring easy maintenance.

### 3.1.3 Communal Areas and Facilities

#### ***Rooftop Gardens***

Landscaped roof gardens and terraces are provided at Third Floor Level (c. 45.2 sqm and 119 sqm, respectively), Fourth Floor Level (c. 154.6 sqm) and Sixth Floor Level (c. 131.5 sqm)). The rooftop garden will include screens (c. 1200 mm – 1800 mm) to reduce the perception of overlooking, shelter the space, improving functionality and usability of this central communal open space.

These rooftop gardens will also incorporate ‘Intensive Green Roofs’, enhancing SuDS measures on the site and improving biodiversity. Extensive green roofs are featured elsewhere throughout the proposed development.

Appendix 7 of the *Development Plan* defines extensive and green roofs as:

*“Extensive green roofs are more lightweight when compared with intensive green roofs with a shallow soil layer and are not normally designed to provide access for people.*

*Intensive green roofs have a deep layer of soil, which can support a range of plants, trees and shrubs. Native species (plants which would grow naturally in the local area) can provide a rich habitat for wildlife. Intensive Green Roofs can be designed to include access for people.”*

We refer to CS Consulting’s Dwg. No. 0013, ‘SuDS Layout’ and Murray & Associates Landscape Architecture’s Dwg. No. 1873\_PL\_P\_01A, ‘Green Roof Masterplan’, for further details.

#### ***Ground Floor Communal Open Space***

Communal open space at ground floor level (880 sqm) is provided. This open space is well-equipped to meet the needs of residents and visitors alike, with ample space for sitting, socialising and catching some sun in a landscaped setting. The central courtyard space will also feature games areas.

Communal open space is provided at the boundary of the Subject Site and Stradbroke Road, which will be landscaped to a high grade. It is considered that this space will activate and upgrade this frontage to Stradbroke Road, thereby improving the public realm in this area.

#### ***Indoor Amenities***

The indoor amenities provided includes a Multipurpose Social Space (261 sqm) and a Break Out Space (42 sqm) at GF Level; a Break Out Space (42 sqm) and a Games Room (44.6 sqm) at First Floor Level; a Break Out Space (42 sqm) and a TV / Cinema Room (44.6 sqm) at Second Floor Level; and a Gym (44.6 sqm) at Third Floor Level.

Supporting staff facilities are also provided. These include a Post Room (13.8 sqm), an Office (20.3 sqm), a Staff Room (29.8 sqm), and Staff Changing Rooms and WC (22.1 sqm))

### 3.1.4 Scheme Management – Integrated Retirement Communities

The Applicant intends to develop the first privately-developed Integrated Retirement Community ('IRC') in Ireland.

The concept of an Integrated Retirement Communities, (commonly referred to as 'senior living'), is described further below:

- Integrated Retirement Communities offer older people the opportunity to live independently in their own home as part of a wider community.
- Lifestyle, wellbeing and support services are available to support people's independence and aspirations.

The integrated aspect of these communities means that they offer:

- **Integrated Lifestyle:** facilities such as gyms, cinemas, reading rooms / libraries, meeting rooms, communal areas and gardens, and a range of optional activities and social opportunities.
- **Integrated Wellbeing and Support:** personal and domestic care can be delivered within people's homes if they wish. Dedicated support staff teams are available if and when required; and
- **Integrated within Wider Communities:** Connections are maintained with the wider communities through family, friends, intergenerational activities, volunteering and leisure activities.

Senior living is a well-established and rapidly growing concept internationally – in the United States over 3.2m older people live in purpose-built retirement communities whilst a significant percentage of the populations of Australia and New Zealand do likewise. These communities mirror a traditional residential development but with a stronger emphasis on resident mental and physical wellbeing and a range of amenities and support services are provided on site to ensure that these objectives are met.

The proposed independent senior living / Integrated Retirement Community at Blackrock will provide a real alternative for older people who wish to move into accommodation suitable for their needs as they grow older. The senior living support model makes it possible to defer or eliminate the need for a nursing home and to avoid much of the cost associated with such care.

As noted in the Planning Authority's Housing Strategy and Housing Needs Demand Assessment (HDNA):

*"Dún Laoghaire-Rathdown has a greater proportion of people over 65 than in County Dublin, the EMRA region or in the State.*

*While it has a similar profile in terms of families by family cycle to other areas, Dún Laoghaire-Rathdown is also an area with a greater percentage of older and retired people than in other counties in the Dublin region."*



As per the HDNA, the proportion of retired couples in the County in 2016 equated to a sizable 13.6% (7,841 No. families) in 2016.<sup>5</sup> While ‘retired’ may not necessarily define all of the residents of the proposed development, we consider this the most appropriate metric provided in the HDNA to determine the County’s households’ age profiles.

We submit that, in addition to the aforementioned 15,682 No. retired people in couples, it is likely that a sizable portion of the 14,809 of the County’s remaining ‘adult’ households are also of the category of residents for which the proposed development is intended – older couples and single people wishing to downsize from larger homes.

### ***Benefits of Integrated Retirement Communities***

Residents of the proposed Integrated Retirement Community will enjoy the following benefits:

- Rightsized quality accommodation that is more manageable, affordable and energy efficient;
- A safe, secure environment that can be adapted to every resident’s needs;
- 24-hour concierge & support staff;
- Adaptable accommodation – every home can be adapted to meet residents’ requirements;
- Quality amenities & facilities including cinema room, gymnasium, library / reading rooms, communal rooms, and other facilities;
- Private gardens with views over Dublin Bay;
- On-site tailored fitness and leisure programs designed to improve physical and overall mental wellbeing;
- Strong companionship and community resulting in a reduction in loneliness;
- Continued proximity to family and friends; and
- The ability to rent, sell or transfer their existing home during their lifetime.

We refer to the *Building Lifecycle Report*, prepared by Renaissance Consultant Engineers, the *Travel Plan* prepared by NRB Consulting Engineers, and the *Integrated Retirement Community Management Plan*, prepared by Aramark.

### **3.1.5 Travel and Transport**

The local transport network, including roads, pedestrian and cycling facilities and public transport connectivity, has been assessed as part of this Planning Application. We refer the Planning Authority to *Residential Travel Mobility Plan* prepared by NRB Consulting Engineers.

The site is located some 400 m (some 4 minutes walking distance) from the nearest bus stops, and some 11 No. bus stops are located within 500 m of the site, serving Dublin Bus routes 4, 84, 84A, 63, 63A, 7B, 7D.

These bus routes serve, *inter alia*, Dún Laoghaire Town Centre, Blackrock Village Centre, Ballsbridge, Dublin City Centre, Dublin’s northside suburbs, Dundrum and County Wicklow, and are considered reasonably frequent (i.e., 10 – 15 minute peak hour frequency).

---

<sup>5</sup> ‘Retired’ in DLRCC’s 2022-28 HDNA is defined as “family nucleus of married or cohabiting couple without children where female is aged 65 years and over”. We note that that metric would not count older or retired single people, male or female.

The Subject Site is also located some 1.6 km walking distance from both Monkstown and Seapoint DART Stations, providing access to a high-capacity urban public transport system.

Public transport improvements (i.e., Bus Connects) are scheduled to be provided for this area. The planned Blackrock to Merrion Core Bus Corridor begins c. 950 m from the Subject Site (see Figures 3.1 and 3.2, below)

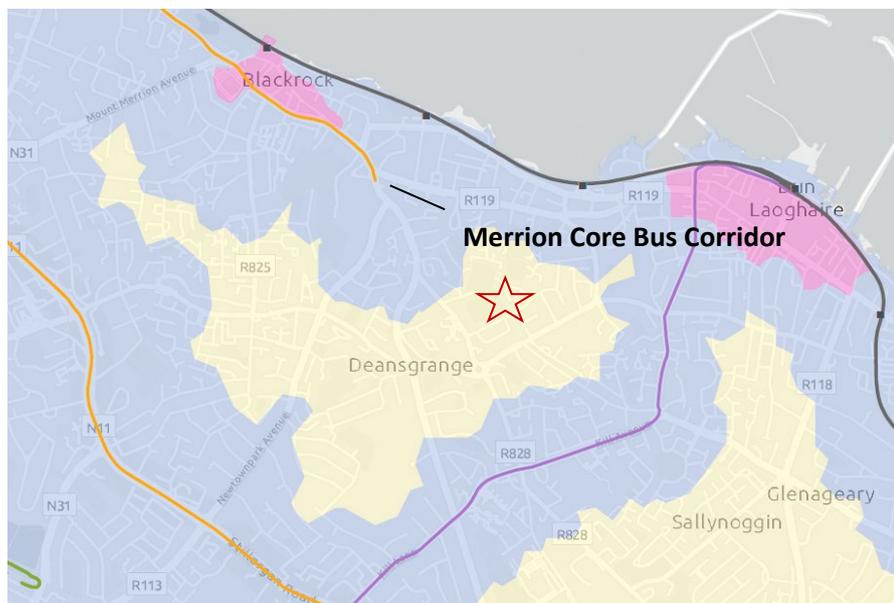
As per the *Dún Laoghaire-Rathdown County Development Plan 2022-28*, increased residential density and height to provide for an increased range of housing options across the County, is permitted close to Core Bus Corridors. Additional planned bus routes (see Figure 3.3, below) will increase accessibility and connectivity across the County, and will improve interchange options, frequency and capacity across the network.

The local roads network is well-equipped for both visually impaired and disabled members of the community, and safety has been the primary objective in considering the proposed design.

We refer to the results of the *Stage 1 Road Safety Audit*, submitted as part of this Planning Application, which recommended that the footpaths be maintained across all vehicular entrances. The proposed development has been amended to address this recommendation.

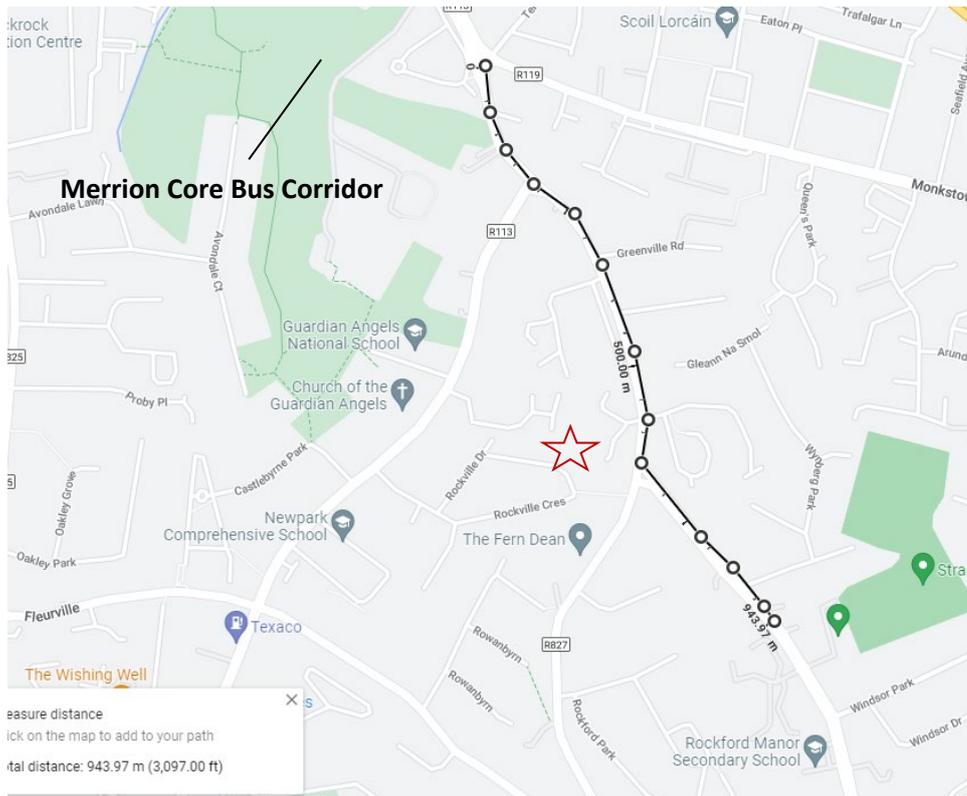
This proposed development includes for upgrades to the vehicular entrance of the Subject Site, which serves both Blackrock College RFC and the existing childcare facility at Somerset House, as well as the proposed mixed-use development.

The proposed development also includes for some 55 No. residential car parking spaces at basement level, 12 No. car parking spaces at surface level for use by the existing childcare facility (no change to car parking provision for the childcare facility), and 1 No. commercial car parking space at surface level.



**Figure 3.1:** Parking Zones Map with site location in Parking Zone 3 indicated. Source: *Dún Laoghaire-Rathdown Development Plan, 2022*. Cropped and annotated by TPA, June 2022.

The National Transport Authority (NTA) intends to have applied to An Bord Pleanála to seek permissions by the end of 2022 to operate the entire system.



**Figure 3.2:** Extract from Google Maps with site location indicated by star shape. Location of the Merrion Bus Corridor also shown, some 950 m walking distance from the Subject Site. Source: *Google Maps*, 2022. Cropped and annotated by TPA, June 2022.



**Figure 3.3:** Dún Laoghaire Area Bus Connects Map. (Source: BusConnects.ie – Dublin Area Bust Network Redesign – Phase 2 BusConnects Network Redesign. Extracted by TPA, 2022.)



We also refer the Board to *the Transportation Assessment Report*, prepared by NBR Consulting Engineers and submitted as part of this SHD Planning Application.

### **3.1.5 Drainage Systems, Water and Flooding**

#### ***Drainage Connections***

It is proposed to connect to the existing 225 mm PVC sewer network at Stradbrook Road for both foul networks. The proposed development shall require a new 225mm foul sewer to traverse Stradbrook Road from the subject site to the existing Irish Water manhole further north. We refer to CS Consulting's *Engineering Services Report* for further details and for the *Irish Water Confirmation of Feasibility* and *Irish Water Statement of Design Acceptance* received in relation to the proposed development.

#### ***Surface Water Drainage***

The surface water drainage system measures within the proposed development incorporates SuDS measures including rainwater harvesting, permeable paving, the provision of Green Roofs, and an attenuation tank (c. 240 m<sup>3</sup>) with a restricted outfall to prescribed QBar runoff rate of 1.51 l/s. We refer the Planning Authority to CS Consulting's *Engineering Services Report*, submitted as part of this Planning Application.

An interceptor will be installed prior to runoff entering the proposed attenuation tank to improve the water quality by removing silt / hydrocarbons etc., prior to final discharge into the combined sewer network.

Rainwater will be collected in waterbutts and reused for landscaping. The proposed development includes for green roof systems amounting to c. 71% of the Subject Site. Water butts are also provided. Permeable paving will also be provided



### 3.2 Development Statistics

**Table 4.1: Development Statistics for the Proposed Residential Development**

| Development Statistic                                | Proposed Development - ABP Ref. 311879-21  |                   |         |
|--|--|-------------------|---------|
| <b>Gross Site Area</b>                               | 0.4813 ha (4813 sqm)   |                   |         |
| <b>Zoning(s)</b>                                     | E: 'To provide for economic development and employment'.<br>Offices – Permitted in Principle; Residential Development (in accordance with Policy Objective E15: Securing Employment Growth, i.e., to 'facilitate' economic development and employment) – Open for Consideration. |                   |         |
| <b>Total No. Units Proposed</b>                      | 108 No.  | No. of Apartments | 108 No. |
| <b>Part V</b>  | 30 No. units (27%)   |                   |         |
| <b>Build to Rent</b>                                 | 100% BTR to be professionally managed as an integrated retirement community for senior citizens .  |                   |         |
| <b>Gross Residential Floor Area</b>                  | c. 12,547.6 sqm (c. 12,738 minus commercial / office)  |                   |         |
| <b>Gross 'Other' Floor Area</b>                      | c. 190.4 sqm (c. 175.5 sqm – Separate 'Office' Use; c. 14.9 sqm – Office Bin Store)  |                   |         |
| <b>Gross Floor Area</b>                              | c. 12,738 sqm  |                   |         |
| <b>Gross Demolition Area</b>                         | c. 1,210 sqm   |                   |         |
| <b>Net Density</b>                                   | 225 dph  |                   |         |
| <b>Net Site Coverage</b>                             | 48%  |                   |         |
| <b>Plot Ratio</b>                                    | 1:2.1  |                   |         |
| <b>Car Parking</b>                                   | 68 No. car parking spaces<br>(55 No. residential at basement level; and 13 No. at surface level (incl. 12 No. creche spaces and 1 No. commercial space)<br><br><b>Residential Car Parking Ratio: 0.51</b>  |                   |         |
| <b>Cycle Parking</b>                                 | 202 No. cycle parking spaces<br>(148 No. secure at basement level; 54 No. at surface level (incl. 24 No. secure and 30 No. short-term)   |                   |         |
| <b>Bedroom / Unit Types</b>                          | 1-bed  | 83 No.            |         |
|  | 2-bed  | 25 No.            |         |
| <b>Building Height</b>                               | 3-7 storeys (max height: 24.35 m (excl. lift overrun))   |                   |         |
| <b>Aspect</b>  | 52% dual aspect  |                   |         |
| <b>Public Open Space</b>                             | 0 sqm  |                   |         |
| <b>Communal Open Space</b>                           | Communal open space at ground floor level (880 sqm) and roof gardens and terraces at Third Floor Level (45.2 sqm and 119 sqm, respectively), Fourth Floor Level (154.6 sqm) and Sixth Floor Level (131.5 sqm))   |                   |         |
|  | <b>Total: 1,330.3 sqm</b>  |                   |         |
| <b>Communal Amenity Space</b>                        | Multipurpose Social Space (261 sqm) and Break Out Space (42 sqm) at GF Level; Break Out Space (42 sqm) and Games Room (44.6 sqm) at First Floor Level; Break Out Space (42 sqm) and TV / Cinema Room (44.6 sqm) at Second Floor Level; Gym (44.6 sqm) at Third Floor Level       |                   |         |
|  | <b>Total: 521 sqm</b>  |                   |         |
| <b>Communal Facility Space (excl. Basement Area)</b> | Staff Facilities (Post Room (13.8 sqm), Office (20.3 sqm), Staff Room (29.8 sqm), Staff Changing Rooms and WC (22.1 sqm))  |                   |         |
|  | <b>Total: 86 sqm</b>   |                   |         |



## 4.0 KEY PLANNING ISSUES FOR THE SUBJECT SITE

### 4.1 Policy Context

The Subject Site is located within the administrative area of Dún Laoghaire-Rathdown County Council, and is generally subject to the policies contained within the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

### 4.2 Principle of Development

The proposed development which comprises a residential development, suitable for those at all stages of the lifecycle but with the particular needs of senior citizens in mind, is permitted at the Subject Site having regard to the policy designations pertaining to the lands.

The subject lands are zoned 'Objective E' (see Figure 5.2, below), the aim of which is:

*'To provide for economic development and employment'.*

'Office' uses are 'Permitted in Principle', and 'Residential' uses are listed as 'Open for Consideration' uses under this zoning objective. See Figure 4.1, below:

Table 13.1.13

| ZONING OBJECTIVE 'E'  |
|---|
| 'To provide for economic development and employment'.   |
| Permitted In Principle  |
| Advertisements and Advertising Structures, Carpark, Cash and Carry/Wholesale Outlet, Craft Centre/Craft Shop, Childcare Service, Enterprise Centre, Heavy Vehicle Park, Hospital, Household Fuel Depot, Industry-General, Industry-Light, Industry-Special, Motor Sales Outlet, Office Based Industry, Offices, Open Space, Public Services, Refuse Transfer Station, Rural Industry- Food, Science and Technology Based Industry, Scrap Yard, Service Garage, Tea Room/Café, Transport Depot, Travellers Accommodation, Warehousing.   |
| Open For Consideration  |
| Abattoir, Aparthotel, Assisted Living Accommodation, Boarding Kennels, Community Facility, Cultural Use, Doctor/ Dentist etc., Education, Funeral Home, Garden Centre/Plant Nursery, Health Centre / Healthcare Facility, Home Based Economic Activities, Hotel/ Motel, Industry-Extractive, Leisure Facility <sup>a</sup> , Nightclub, Off-License, Place of Public Worship, Public House, Refuse Landfill/Tip, Residential <sup>b</sup> , Retail Warehouse, Restaurant, Rural Industry-Cottage, Rural Industry-Cottage, Service Station, Shop Specialist, Shop-Neighbourhood, Shop-District, Sports Facility, Veterinary Surgery. |
| <b>a:</b> Only applies to 'E' zoned lands subject to a Specific Local Objective for a 'Neighbourhood Centre'.   |
| <b>b:</b> In accordance with Policy Objective E15: Securing Employment Growth.  |

Figure 4.1: 'Permissible' and 'Open for Consideration' uses for E-zoned lands. Source: *Dún Laoghaire-Rathdown Development Plan 2022-28*. Cropped and annotated by TPA, March 2022.

We note that, while 'Residential' development is an open for consideration land use for Objective E-zoned lands, such lands are also subject to Policy E15 of the *Development Plan* (Securing Employment Growth) which states:

*"It is a Policy Objective to ensure that employment zoned land facilitates its primary objective which is to provide for economic development and employment. The Council will apply a restrictive approach to residential development on employment zoned lands."*

The proposed development seeks permission to demolish a vacant commercial office block measuring some 1,210 sqm. A mixed-use scheme, incorporating, *inter alia*, 2 No.



employment-generating uses including a Build-to-Rent residential scheme incorporating c. 86 sqm of non-residential staff spaces, and a c. 175 sqm commercial office space, is proposed.

We consider that Policy E15, which seeks that employment-zoned lands facilitate economic development and employment, is fulfilled through the proposed development.

#### 4.3 Innovation Hub

The proposed development includes for c. 175 sqm of commercial office space that will be specially dedicated to technology research and development in the Senior Living sector and will act as Ireland's first 'Innovation Hub for Elder Care'.

The Applicant has identified a leading 'med tech' partner who will assist in the design, development, testing, roll out and commercialization of assistive technologies specifically focused on the challenges faced by our ageing population and those responsible for the care of that population. The technologies to be developed in the Innovation Hub will be capable of being rolled out in other similar Integrated Retirement Communities planned by the Applicant in Ireland and also in third party developed and operated Senior Living schemes, nursing homes and private homes.

The software and hardware, applications and services to be developed in the Innovation Hub will focus on key issues affecting our Senior population, including:

- Hearing loss
- Medication management, including reminders and dispensing
- Health care monitoring and treatment
- The use of wearables / devices for healthcare monitoring and management
- Document / records management, digitization and integration
- Social networking opportunities for the elderly, including through gamification
- Lifestyle, fitness, health and wellbeing
- Recovery platforms and supports.

It is intended that, in time, the Innovation Hub can and will become a Ireland's first med tech centre of excellence focused on healthcare services and supports solely for our rapidly growing older population.

#### 4.4 Employment Lands – 'E' Zoning Objective Designation

Chapter 6 of the *Development Plan* contains Council policy in relation to Enterprise and Employment, including high level policies relating to 'Retail and Major Town Centres'.

Section 6.4.2.14 contains Policy Objective E15: Securing Employment Growth which states the following:

*"It is a Policy Objective to ensure that employment zoned land facilitates its primary objective which is to provide for economic development and employment.*

*The Council will apply a restrictive approach to residential development on employment zoned lands."*



The *Development Plan* also notes that:

*“At employment zoned lands elsewhere in the County, a minor element of residential use may be considered in appropriate locations where a proposed development makes a positive contribution to the area in terms of adding to the richness and diversity of uses and/or significantly contributes to the public realm. The appropriate location for residential use would generally be in close proximity to public transport nodes and adjacent to facilities such as shops, crèches, restaurants and hotels and other community and recreation infrastructure. Generally, any residential development proposals on such ‘E’ zoned lands must ensure that the employment element on site in terms of floor space is no less than that on site prior to redevelopment and must ensure that the employment element on site in terms of overall floor space remains the primary land use and doesn’t undermine the use of adjoining lands for employment use.”*

Given that the proposed employment-related floor space amounts to less than the employment-related floorspace within the existing (albeit substantially vacant) office building, and because the employment element on site in terms of overall floor space does not remain the primary land use within the proposed development, we conclude that the proposed development represents a material contravention of the employment policy relating to the site as per the *Development Plan*.

In this regard, please refer to the enclosed *Material Contravention Statement* included with this application submission.

As noted above, the proposed development is not lacking employment-related uses. The proposed development, which is a serviced senior living BTR scheme, includes for a reasonable amount of employment in property management and maintenance, as well as for a hub for various services to be offered to residents such as workshops and treatments.

Some 10 No. employees are expected to be accommodated within the office element of the proposed development, and an additional 12 No. support staff are expected to be employed in the residential element on a shift basis. We refer to the submitted *Stradbrook Road Extra Care Economic Benefits Assessment*, prepared by Savills and submitted as part of this SHD Planning Application.

Such uses will provide for a level of activity and animation that is not currently offered by the vacant commercial office block at the Subject Site.

At present, the lands are underutilised. This is not a sustainable use for the lands acknowledging the current housing crisis, and is contrary to national policy objectives, as contained within the *National Planning Framework* (NPF) to provide additional housing in existing built-up urban areas.

#### **4.5 Purpose-Built Senior Living Accommodation**

Section 2.0 of the *Apartment Design Guidelines* notes that, in order to meet housing demand, it is necessary to “*significantly increase supply*”, which will in turn require a “*dramatic increase in the provision of apartment development.*”

Section 2.11 of the Guidelines notes that:

*“Ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include [inter alia]:*

- **Older people, in both independent and assisted living settings.”**

Section 2.6.4 of the 2022 Dún Laoghaire-Rathdown *Housing Demand Needs Assessment* (HDNA) considers the provision of specific housing for older persons. Difficulties encountered by older people within the County relating to housing supply have encouraged:

*“DLR Housing Department [to be] **currently proactively promoting downsizing where appropriate**, also referred to as ‘Rightsizing at the Right Time’ as part of its ongoing efforts to ensure the best use of the Council’s social housing stock.”*

The HDNA also notes that the provision of accommodation for older persons is beneficial for meeting social housing needs and Part V purposes, and is therefore encouraged.

While not sought in relation to the proposed development, the HDNA includes a policy that Part V obligations be reduced where it is proposed that any site be developed for, *inter alia*, **‘supported housing for older persons’**. The HDNA expressly notes that this is:

*“to encourage the development of these types of units.”*

Some 30 No. social housing residential units are proposed within this Planning Application.

The Planning Authority notes that the provision of specific housing options for older people is likely to have a wider positive effect on the local market. The HDNA states that such housing provision, as included within the proposed development:

*“may also result in older people vacating larger units for units more appropriate to their current needs and in turn returning family sized accommodation to the market.”*

As such, the HDNA highlights the wider *Development Plan* Policy Objective PHP30: ‘Housing for All’:

*“It is a policy objective to:*

- **Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES.**
- **Support the provision of specific purpose-built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties.**
- **Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.”**

The proposed development includes for a serviced residential (BTR) development comprising 108 No. senior-living apartments intended to cater for members of the local community intending to ‘down-size’ but who wish to remain at home in Dún Laoghaire-Rathdown.

A range of services will be available to residents, including a gym, a TV / cinema room, a reading room / library, communal open areas, and additional communal facilities.

#### 4.6 Residential Density

The proposed scheme has a density of 224 dwellings per ha, which is compliant with local and national policy, to consolidate urban growth and provide in excess of 50 units/ha, having regard to the site's location and the characteristics of the proposed development.

The proposed development complies with Policy PHP18 as it provides additional residential units at residentially zoned lands, in an established urban area. The proposed development has been designed to respect the amenities of adjoining residential communities, and will provide a high-quality lifestyle to future residents, while also contributing positively to the public realm.

The proposed development provides for an appropriate balance of protecting existing residential amenities including the established character of the surrounding area, and providing for high-quality residential development for an identified housing market need at a viable level.

#### 4.7 Building Height

In relation to sustainable urban development and apartment development, there is a suite of national planning policy that requires the delivery of higher density development to achieve national objectives surrounding housing delivery. In the absence of finite land supply, increased building height is an essential component of achieving the required higher densities whilst maintaining a high standard of living accommodation and achieving sustainable communities.

In this context, the *Building Height Guidelines* provides a mechanism through which building heights (and therefore densities), higher than those that may be permissible under the *Development Plan*, can be permitted.

The proposed development, including 2 No. blocks ranging between 3 and 7 storeys complies with the *Building Height Guidelines* and the performance-based criteria contained at Appendix 5 of the *Development Plan*, as demonstrated by the full suite of site-specific assessment enclosed with this submission. We refer to Sections 4.9 and 5.4.28 of the submitted *Statement of Consistency*, prepared by Tom Phillips + Associates and submitted as part of this Planning Application.

The proposed development provides for an appropriate residential density and has been designed to provide a good levels of residential amenity of future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents.

#### 4.8 Relationship with Neighbouring Development

In their current use, the subject lands are largely disconnected from the surrounding area, with the vacant state of the existing Stradbrook House structure contrasting with the vitality afforded to the street by the neighbouring community and residential uses.



The relationship between these surrounding uses and the proposed development has been central throughout the design process.

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

### ***Daylight, Sunlight and Overshadowing***

In terms of daylight, sunlight and overshadowing impact upon neighbouring development, the proposed development has undergone detailed daylight, sunlight and overshadowing assessment in respect of its potential impact upon surrounding residential amenity in this regard. Refer to *Sunlight & Daylight Analysis* by IN2, submitted as part of this Planning Application.

In summary, the assessment has been undertaken strictly in accordance with the BRE Guidelines, as required by the relevant policy provisions. From a daylight perspective, IN2 assessed all 34 No. windows across 13 No. properties. When assessed against the Vertical Sky Component (VSC), there is predicted to be no impact from the proposed development. From a sunlight perspective, GIA tested 12 No. windows that face within 90 degrees due south of the development site in line with the Guidelines. When assessed against Annual Probably Sunlight Hours (APSH), all of the windows satisfy the BRE target values.

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

### ***Overbearing***

The proposed height and massing strategy has been formulated to reduce any perceived potential overbearing impacts associated with the proposed development. The considered use of fenestration and the wide range of high-quality materials included have worked to break up the façade of the proposed blocks and to introduce a human scale to the development.

Notwithstanding this, we note that a sense or experience of ‘overbearingness’ is subjective and therefore difficult to quantify for assessment purposes. Nevertheless, in our view, the proposed separation distances and height strategy mitigate concerns in this regard. This is further evidenced by the positive daylight, sunlight and overshadowing assessment in respect of the impact of the proposed development upon surrounding neighbouring development. The conclusions of the TVIA are also considered to support this.

### ***Overlooking***

A number of measures have been taken to minimise the amount of potential overlooking arising from the proposed development, including the provision of privacy screens on some of the balconies and roof gardens, and the provision of opaque windows at certain elevations.



Due to the design changes made and embedded mitigating features such as generous separation distances between the proposed building and neighbouring residential development, it is not considered that the proposed development will give rise to unacceptable adverse impact in relation to overlooking.

The Subject Proposal includes for privacy screens for communal open spaces to mitigate against perceived overlooking. We refer to Murray's Dwg. No. 1873\_PL\_P\_01A, 'Green Roof Masterplan'.

#### 4.9 Sustainable Mobility

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

In addition to the location of the lands, the nature and characteristics of the proposed development is considered to encourage and support the use of sustainable modes of transport and minimise reliance on car use.

We refer to Section 3.1.5 of this *Planning Report*, above. Full details of the transport proposals and assessment is contained within the *Transportation Assessment Report* prepared by NRB.

We refer to the *Material Contravention Statement*, submitted as part of this SHD Planning Application, which provides a full assessment of the proposed residential car parking provision against the relevant *Development Plan* standards and the *Apartment Design Guidelines*. We confirm that the residential car parking proposed aligns with the provisions for reduced car parking contained within both the *Development Plan* and the *Apartment Design Guidelines*.

As outlined above, the Subject Site is suitable for a lower car parking provision than that prescribed by the *Development Plan*. The proposed development is consistent with various national and regional planning policies.

The proposed development is therefore justified in potentially materially contravening the *Dún Laoghaire-Rathdown Development Plan 2022-28*, which seems to be inconsistent with the referenced higher-level policies and is inconsistent with national policy and section 28 Guidelines.

Thus, having regard to the:

- Strategic nature of the proposed development in achieving the goals of the National Planning Framework; the
- Relevant Regional Spatial and Economic Strategy for the area, guidelines under section 28, and other relevant policies of the Government;
- Pattern of development and permissions granted in the area since making the LAP.

we conclude that permission should be granted for the proposed development.

#### 4.10 Landscaping

Murray & Associates Landscape Architecture has prepared a drawing pack and accompanying *Landscape Design Report*, submitted as part of this Planning Application.

#### 4.11 Ecology

A full *Natura Impact Assessment* has been conducted in relation to the proposed development. That NIS concludes that no significant adverse impacts on the conservation objectives of Natura 2000 sites are likely following the implementation of the mitigation measures outlined.

An *Ecological Impact Assessment* (EclA) is also provided, which outlines, *inter alia*, the character of the current Subject Site from an ecological perspective. The recorded habitats comprise buildings and artificial surfaces, scrub, and treeline.

That Assessment also reviews the predicted impacts during construction and operational stages of the proposed development and concludes that no significant environmental impacts are likely in relation to the construction or operation of the proposed development.

#### 4.12 Engineering

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

In terms of foul water, the proposed foul drainage system will connect to the combined sewer network at the existing 225 mm sewer on Stradbrook Road.

In terms of proposed watermains, the proposed development will be connected to an existing public watermain on Stradbrook Road.

Furthermore, the proposed surface water drainage system is designed to comply with the Greater Dublin Strategic Drainage Study (GDSDS) and other relevant guidelines and codes of practice. As described in the landscape section of this Report, the proposed development includes extensive SuDS proposals which are considered to mitigate flood risk and protect natural water cycle, manage the quality of the runoff to prevent pollution, create and sustain better places for people (amenity) and create and sustain better places for nature (biodiversity). The proposed SuDS measures are considered to deliver significant benefits from a flood risk and sustainability perspective and are described in the *Engineering Services Report*.



## 5.0 DOCUMENTS SUBMITTED AS PART OF THIS APPLICATION

2 no. hard copies of each the inputs specified below have been prepared for submission to An Bord Pleanála. 3 No. digital copies of the submission are also enclosed.

6 no. copies of the inputs outlined below have been prepared for submission to Dún Laoghaire-Rathdown County Council, along with 1 No. digital copy of the submission.

These are:

### Documents

#### Planning

- Cover Letter to ABP dated Monday, 11 July 2022, prepared by Tom Phillips + Associates.
- Cover Letter to Dún Laoghaire-Rathdown County Council dated Monday, 11 July 2022, prepared by Tom Phillips + Associates.
- Copy of Cover Letter to Irish Water dated Monday, 11 July 2022, prepared by Tom Phillips + Associates.
- Cover Letter to Dún Laoghaire-Rathdown Childcare Committee dated Monday, 11 July 2022, prepared by Tom Phillips + Associates.
- Copy of Site Notice, erected on Friday, 08 July 2022, prepared by Tom Phillips + Associates.
- 1 No. Original Newspaper Notice (and 7 No. scanned copies), published on Friday, 08 July 2022 in the Irish Daily Mail.
- *Planning Application Form* (incl. *Letter of Consent from Blackrock College RFC, Document Schedule, Drawing Schedule, Part V details* (incl. Applicant Part V Proposal and Dún Laoghaire Rathdown County Council Housing Department and EFT Payment Confirmation Details (€15,300)), dated Monday, 11 July 2022, prepared by Tom Phillips + Associates.
- *Statement of Consistency*, dated July 2022, prepared by Tom Phillips + Associates.
- *Material Contravention Statement*, dated July 2022, prepared by Tom Phillips + Associates.
- *Planning Report*, dated July 2022, prepared by Tom Phillips + Associates.
- *Response to An Bord Pleanála Opinion*, dated July 2022, prepared by Tom Phillips + Associates.
- *EIAR Screening Report*, dated Friday, 08 July 2022, prepared by Tom Phillips + Associates.
- *Draft Legal Covenant (s. 47 Agreement) relating to Build to Rent Development*, prepared by the Applicant.
- *Legal Opinion on Zoning*, dated 11 May 2022, prepared by McCann FitzGerald LLP.
- ESRI Shapefile on CD, prepared by MCA Architects.
- Planning Fee (Balance by Cheque) (€110).

#### Architecture

- *Architectural Design Statement* (incl. *HQA and Schedule of Accommodation*), dated July 2022, prepared by MCA Architecture.

- *Housing Quality Assessment*, prepared by MCA Architects.
- *Character & Materiality Report*, prepared by MCA Architects.

### **Engineering (Civil)**

- *Engineering Services Report*, dated 05 July 2022, prepared by CS Consulting Group.
- *Stormwater Audit Stage 1 Report*, dated 7 July 2022, prepared by JBA Consulting and with an associated cover letter prepared by CS Consulting Group.
- *Site Specific Flood Risk Assessment*, dated 06 July 2022, prepared by CS Consulting Group.
- *Stage 1 Construction Management Plan*, dated 01 July 2022, prepared by CS Consulting Group.
- *Stage 1 Demolition and Construction Waste Management Plan*, dated 01 July 2022, prepared by CS Consulting Group.
- *Structural Statement*, dated 05 July 2021, prepared by CS Consulting Group.
- *Irish Water Design Acceptance*, dated 01 July 2021, prepared by CS Consulting Group.

### **Engineering (M&E)**

- *M&E Incoming Utility Services – Development at Stradbroke Road*, prepared by Renaissance Engineering.
- *Sustainability Report – Stradbroke Road SHD, Blackrock, Co. Dublin*, dated July 2022, prepared by Renaissance Engineering.
- *Building Lifecycle Report – Stradbroke Road SHD, Blackrock, Co. Dublin*, dated July 2022, prepared by Renaissance Engineering.
- *Site Lighting Datasheets*, dated July 2022 and prepared by Renaissance Engineering.

### **Transport & Traffic**

- *Transportation Assessment Report (incl. Stg 1 RSA, DMURS Statement of Consistency, Preliminary Travel Plan, Transport Capacity Report)*, dated July 2022, prepared by NRB Consulting Engineers.

### **Landscaping**

- *Landscape Design Report*, dated July 2022, prepared by Murray & Associates Landscape Architects.
- *Landscape Management Plan – Outline Specifications for Landscape Works*, dated June 2022, prepared by Murray & Associates Landscape Architects.
- *Arboricultural Inventory and Impact Assessment*, dated Tuesday, 05 July 2022, prepared by Murray & Associates Landscape Architects.

### **Ecology**

- *Appropriate Assessment Screening & Natura Impact Statement – Information for a Stage 1 (AA Screening) and Stage 2 (Natura Impact Statement) AA for a Proposed*

*Mixed-Use Development at Stradbrook Road, Mountashton, Blackrock, Co. Dublin*, dated 7 July 2022, prepared by Altemar Limited.

- *Ecological Impact Assessment (EclA) for a Proposed Mixed-Use Development at Stradbrook Road, Mountashton, Blackrock, Co. Dublin*, dated 08 July 2022, prepared by Altemar Limited.

## Other

- *Townscape and Visual Impact Assessment*, dated June 2022, prepared by Macroworks.
- *Photomontage & CGIs*, dated 30 June 2022, prepared by Redline Studios.
- *Integrated Retirement Community Management Strategy Report*, dated Thursday, 30 June 2022, prepared by Aramark.
- *Operational Waste Management Plan for a Proposed Mixed-Use Development at Stradbrook Road, Mountashton, Blackrock, Co. Dublin*, dated Thursday, 30 June 2022, prepared by Awn Consulting.
- *Daylight & Sunlight Report (incl. Overshadowing Analysis)* dated 07 July 2022, prepared by IN2 Engineering Design Partnership.
- *South Suburban Office Report*, dated June 2022, prepared by Savills.
- *Stradbrook Road Extra Care Economic Benefits Assessment*, dated July 2022, prepared by Savills.
- *Social Infrastructure Audit*, dated July 2022, prepared by Tom Phillips + Associates.
- *Statement in accordance with Article 299B (1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001-2022, as amended for a proposed mixed-use development at a site on Stradbrook Road, Mountashton, Blackrock, Co. Dublin*, dated 08 July 2022, prepared by Altemar Limited.

## Drawings

### Architecture

| MCA Architects          |   |              |      |      |
|-------------------------|---|--------------|------|------|
| Drawing No.             | Title   | Scale        | Size | Rev. |
| BSL-MCA-00-00-DR-A-1000 | Site Plans (incl. Site Location Map and Site Layout Plan) | As indicated | A1   | P03  |
| BSL-MCA-00-B-DR-A-1001  | Basement Plan   | 1:200        | A1   | P04  |
| BSL-MCA-00-00-DR-A-1002 | Ground Floor Plan   | 1:200        | A1   | P04  |
| BSL-MCA-00-01-DR-A-1003 | First Floor Plan  | 1:200        | A1   | P04  |
| BSL-MCA-00-02-DR-A-1004 | Second Floor Plan   | 1:200        | A1   | P04  |
| BSL-MCA-00-03-DR-A-1005 | Third Floor Plan  | 1:200        | A1   | P04  |
| BSL-MCA-00-04-DR-A-1006 | Fourth Floor Plan   | 1:200        | A1   | P04  |
| BSL-MCA-00-05-DR-A-1007 | Fifth Floor Plan  | 1:200        | A1   | P04  |



|                         |   |             |    |     |
|-------------------------|---|-------------|----|-----|
| BSL-MCA-00-06-DR-A-1008 | Sixth Floor Plan                              | 1:200       | A1 | P04 |
| BSL-MCA-00-07-DR-A-1009 | Roof Plan                                     | 1:200       | A1 | P04 |
| BSL-MCA-00-ZZ-DR-A-1010 | West Elevation                                | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1011 | West and South Elevation                      | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1012 | East and North Elevation                      | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1013 | Sections A & B                                | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1014 | Sections C & D                                | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1015 | Sections E & F                                | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1016 | Unit Types – 1-bedroom                        | 1:100       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1017 | Unit Types – 2-bedroom                        | 1:100       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1018 | Part V Proposal – Distribution Sheet 1 of 2   | 1:250       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1019 | Part V Proposal – Distribution Sheet 2 of 2   | 1:100/1:250 | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1020 | Existing Site Plan / Demolition Plan          | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1021 | Existing West & South Elevations / Demolition | 1:200       | A1 | P03 |
| BSL-MCA-00-XX-DR-A-1022 | Existing East & North Elevations / Demolition | 1:200       | A1 | P03 |
| BSL-MCA-A-1023          | Taken In Charge                               | 1:200       | A1 | P01 |

## Engineering

| CS Engineering          |                                     |       |      |      |
|-------------------------|-------------------------------------|-------|------|------|
| Drawing No.             | Title                               | Scale | Size | Rev. |
| BLK-CSC-ZZ-XX-DR-C-0001 | Overall Site Layout                 | 1:250 | A1   | P04  |
| BLK-CSC-ZZ-XX-DR-C-0002 | Topographical Survey                | 1:250 | A1   | -    |
| BLK-CSC-ZZ-XX-DR-C-0003 | Drainage Plan Layout                | 1:250 | A1   | P03  |
| BLK-CSC-ZZ-B1-DR-C-0004 | Basement Drainage Plan Layout       | 1:200 | A1   | P02  |
| BLK-CSC-ZZ-XX-DR-C-0005 | Watermain Plan Layout               | 1:250 | A1   | P04  |
| BLK-CSC-ZZ-XX-DR-C-0006 | Ground Floor Swept Path Analysis    | 1:250 | A1   | P02  |
| BLK-CSC-ZZ-B1-DR-C-0007 | Basement Layout Swept Path Analysis | 1:250 | A1   | P02  |



|                         |   |              |    |     |
|-------------------------|---|--------------|----|-----|
| BLK-CSC-ZZ-XX-DR-C-0008 | Drainage Details Sheet 1 of 3                     | As indicated | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0009 | Drainage Details Sheet 2 of 3                     | As indicated | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0010 | Drainage Details Sheet 3 of 3                     | As indicated | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0011 | Watermain Details Sheet 1 of 2                    | As indicated | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0012 | Watermain Details Sheet 2 of 2                    | As indicated | A1 | -   |
| BLK-CSC-ZZ-R0-DR-C-0013 | SUDS Layout                                       | 1:250        | A1 | P02 |
| BLK-CSC-ZZ-XX-DR-C-0015 | Proposed Road Plan Layout                         | 1:250        | A1 | P03 |
| BLK-CSC-ZZ-XX-DR-C-0016 | Road Construction Details Sheet 1 of 2            | As indicated | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0017 | Road Construction Details Sheet 2 of 2            | As indicated | A1 | P01 |
| BLK-CSC-ZZ-XX-DR-C-0018 | Proposed Road Profile                             | As indicated | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0019 | Visibility Splay                                  | 1:250        | A1 | P02 |
| BLK-CSC-ZZ-XX-DR-C-0020 | Attenuation Tank Construction Detail Sheet 1 of 2 | NTS          | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0021 | Attenuation Tank Construction Detail Sheet 2 of 2 | NTS          | A1 | -   |
| BLK-CSC-ZZ-XX-DR-C-0022 | Foul Longsections                                 | 1:250        | A1 | P01 |
| BLK-CSC-ZZ-XX-DR-C-0023 | Storm Longsections                                | 1:250        | A1 | P01 |
| BLK-CSC-ZZ-XX-DR-S-0500 | Southern Boundary Structural Details              | As indicated | A1 | -   |

| Renaissance Engineering |                               |       |      |      |
|-------------------------|-------------------------------|-------|------|------|
| Drawing No.             | Title                         | Scale | Size | Rev. |
| 63-S0                   | Proposed Site Lighting Layout | 1:200 | A1   | P2   |

### Landscaping

| Murrays Landscape Architects |                       |       |      |      |
|------------------------------|-----------------------|-------|------|------|
| Drawing No.                  | Title                 | Scale | Size | Rev. |
| 1873_PL_P_01                 | Masterplan            | 1:200 | A1   | 6    |
| 1873_PL_P_03                 | Hard Landscape Plan   | 1:200 | A1   | 3    |
| 1873_PL_P_02                 | Soft Landscape Plan   | 1:200 | A1   | 3    |
| 1873_PL_P_01A                | Green Roof Masterplan | 1:100 | A1   | 3    |
| 1873_TS_P_01                 | Tree Inventory Plan   | 1:200 | A1   | A    |
| 1873_TS_P_02                 | Tree Impact Plan      | 1:200 | A1   | A    |

## **6.0 CONCLUSION**

The provision of a residential development at the subject site is fully in accordance with the *Dún Laoghaire-Rathdown Development Plan 2022-2028*.

The permitted development will provide much needed residential development at these zoned lands at Stradbroom Road, which is within Dublin City suburb of Blackrock and proximate the services and facilities available in that established residential area, as well as those available within Dún Laoghaire and Dublin City Centre. The proposed development of this infill site to provide for much needed residential development in the area is fully in accordance with the proper planning and sustainable development of Dún Laoghaire-Rathdown County.

We trust you will find this Application in order. Please do not hesitate to contact us should you require any further information or clarification on the proposal.

Yours faithfully



---

**Stephen Barrett**  
**Director**  
**Tom Phillips + Associates**