Statement of Response to LRD Opinion

Large Scale Residential Development at:

43-50 Dolphin's Barn Street,
Dublin 8.

On behalf of

The Iveagh Trust

March 2025

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Table of Contents

1 INTRODUCTION 3

2 RESPONSE TO LRD OPINION 4

3 CONCLUSION 27

1 INTRODUCTION

We, Brock McClure Planning and Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have been instructed by our client, **The Iveagh Trust,** to prepare this Response to Dublin City Council's LRD Opinion issued on the 25th of September 2024 to support the application for a Large-Scale Residential Development (LRD) on lands at **43-50 Dolphin's Barn Street, Dublin 8.**

This report is a response to the issues and queries raised in the LRD Opinion issued by Dublin City Council on 25th of September 2024 following the pre-application process and with regard to the consultation meeting for the application for a Large-Scale Residential Development on the subject site.

This response is prepared in association with the Design Team for the scheme. Each item is addressed in turn and relevant cross references to other accompanying documentation are provided.

This report also refers to the information the Planning Authority required to be submitted in accordance with Article 16A(7) of the Planning and Development Regulations, 2000 (as amended).

1.1 LRD Meeting

The LRD Meeting was held with Dublin City Council on 29th of August 2024, and was attended by representatives of the Applicant, the Design Team and representatives of the Planning Authority from *inter alia* Planning, Conservation, Archaeology, Drainage, Roads, Parks Sections.

The LRD Meeting was informed by the LRD Meeting Request, submitted to the Planning Authority electronically which consisted of a draft Planning Application, including a largely designed scheme and a wide range of supporting documents.

1.2 LRD Opinion

The LRD Opinion prepared by the Planning Authority, issued electronically by email, and hard copies posted on the 25th of September 2024, confirmed that the documentation submitted at pre-application consultation ***"did not constitute a reasonable basis*** *on which to make an application*".

Under the provisions of Section 32D of the Act, the Planning Authority identified 5 No. areas requiring further consideration/amendment in order for the submitted documents to constitute a reasonable basis on which to make an LRD application. These are addressed in turn in Section 2 of this Report.

As noted the LRD opinion report is dated 25th of September 2024, and accordingly the final date to submit a LRD planning application is 25th of March 2025 (6 months). We can confirm that this LRD application has been lodged within this timeframe.

2 RESPONSE TO LRD OPINION

Pursuant to Section 32D of the Planning and Development Act 2000 (as amended), the Planning Authority is of the Opinion the documents submitted do not constitute a reasonable basis on which to make the application – however they have stated that if the following issues are addressed it could result in the documents constituting a reasonable basis on which to make the application. The following specific information is now addressed as requested:

2.1 Item 1 – Planning

Item 1.1 - Design & Layout (Height & Density)

In terms of architectural design treatment, the Planning Authority recommends that the tone and colour of the proposed external finished are reconsidered as the widespread use of grey colouring in the brickwork and cladding as proposed, would fail to positively contribute to the streetscape, or enhance the overall quality of the urban environment. It is suggested that alternative finishes should be considered i.e. warmer colours.

Applicant Response:

In response to this Item, the LRD application now provides alternative finishes i.e. warmer colours. Figure 1 below shows the proposed materiality of the scheme now presented, chosen by the project architects, CWOB:

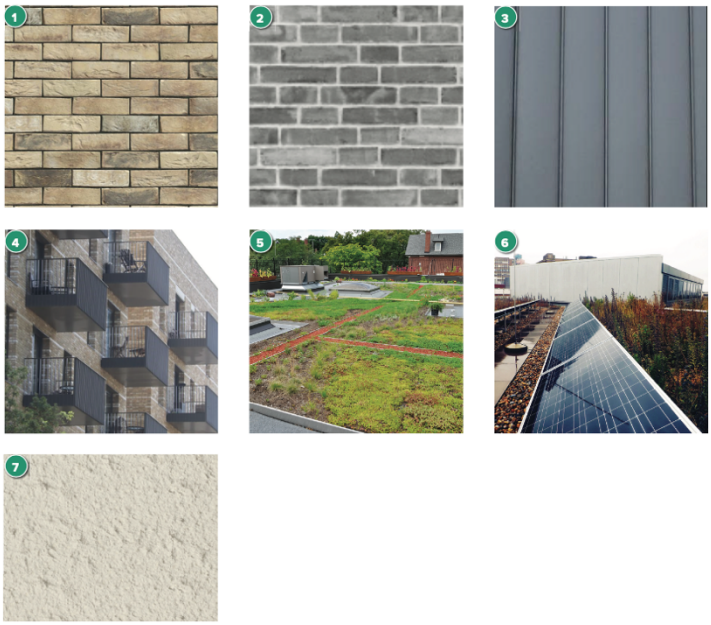


Figure 1: Proposed Materiality

The use of brick as the predominant material provides warmth and gives human scale to the facade and is a proven durable facade material. It was also selected for its robustness, domesticity and ease of maintenance. The upper levels utilise a grey cladding material to soften the upper set-back levels and provide variation within the articulation of the façades. The colour of the grey cladding material

use on the upper most floors resonates down through the facade via the expression of the window frames and balcony design.

We refer the Planning Authority to the Architectural Design Statement prepared by CWOB for details.

In addition to this, Verified View Photomontages for the scheme have been prepared by 3D Design Bureau, which show how the proposed development will appear once constructed in the context of its surroundings along Dolphins Barn Street. We refer the Planning Authority to the accompanying Photomontage booklet prepared by 3D Design Bureau for details.

Item 1.2 - Unit Mix

The proposed residential mix does not comply with the mix specified in the Housing Demand Needs Assessment carried out for the Liberties area. Whilst it is acknowledged that Section 15.9.1 of the City Development Plan 2022-2028 provides for a relaxation of the unit mix for proposed social housing and infill schemes, the proposed mix should be clearly justified. Confirmation that Dublin City Council Housing Department supports the proposed residential mix should also be provided with the planning application.

Applicant Response:

In response to this Item, it is noted that Section 15.9.1 of the Development Plan refer to Specific Planning Policy Requirement 1 of the Apartment Guidelines, which states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.

As illustrated in Figure 2 below, the subject site is located within the Liberties – Dublin 8 (indicated by the black star), which was identified for sub-city HDNA analysis. The outcome of these the HNDA indicated increased demand for two and three person households and declining demand regarding single person households.

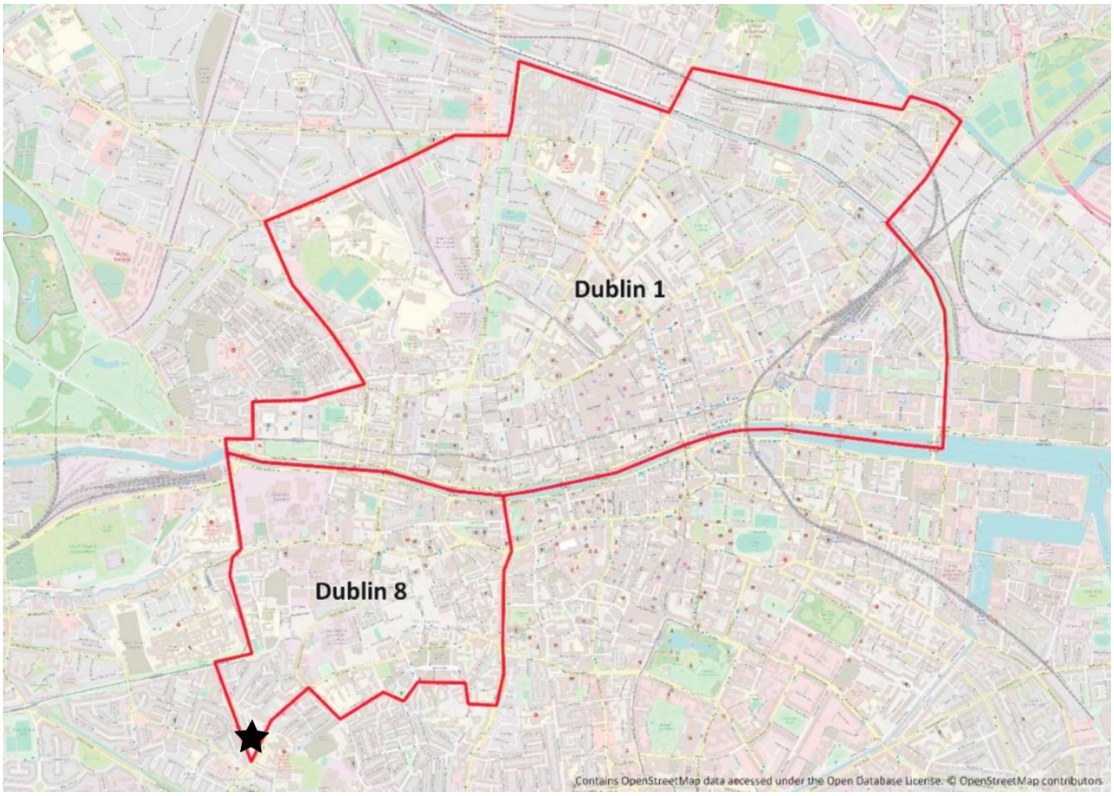


Figure 2 – Dublin City HDNA sub areas with subject site outlined by black star (extract from Figure 1-2 – appendix 3)

It's noted that residential accommodation of 15 residential units for more in the Liberties Sub-City Area shall include the following mix of units:

- A minimum of 15% three or more-bedroom units; and
- A maximum of 25%-30% one bedroom / studio units.

However, the Plan states that standards may be relaxed for other social housing needs and/or where there is a verified need for a particular form of housing, such as the subject site. The unit mix has been agreed with DCC's Housing Department, and correspondence confirming same is now submitted to the Dublin City Council Planning Department as part of this application pack for consideration.

The mix within this development proposal is as follows:

- 6 no. 1 bed units (5.0%)
- 64 no. 1 bed units + 10% (53.8%)
- 2 no. 2 bed units (3 person) (1.7%)
- 35 no. 2 bed (4 person) (29.4%)
- 12 no. 2 bed (4 person) (10.1%)

Considering the proposed scheme is for an Approved Housing Body and is being developed on an infill site, the proposal is therefore in accordance with the Development Plan and Sustainable Urban Housing: Design Standards for New Apartments (July 2023) requirements for residential mix and unit mix requirements as listed in the Dublin City Development Plan 2022-2028 can be relaxed. The unit mix has been agreed with the Dublin City Council Housing Department. Confirmation of support of the DCC Housing Department has been provided by Aisling Browne, Senior Executive Officer, and is submitted as part of this application pack.

Item 1.3 - Mix of Uses (Community Hub & Z4 Zoning)

Notwithstanding that the proposed Community Hub is considered a permissible use under Z4 zoned site, there are concerns relating to the scale/area of non-residential uses which is substantially below that of the existing commercial space (3,243.5 sqm) and c. 7 no. units as part of a parade on Dolphin's Barn St and the scale of non-residential units permitted under the previous application Reg. Ref. 3853/17 (ABP Ref. 302149-18). As part of a Stage 3 application, a detailed report shall be submitted which sets out a justification and rationale for the scale of non-residential uses with an emphasis on commercial/retail having regard to the Z4 Urban Village zoning which requires provision and improvement of mixed services facilities which includes for the creation of a vibrant retail and commercial core with animated streetscapes. A diversity of uses should be promoted to maintain vitality throughout the day and evening. The report shall address the provision of existing and proposed/permitted services in the vicinity and the impact of the proposed development on the surrounding area.

Applicant Response:

In response to this Item, it is first noted that there is currently no commercial use on the subject site. The buildings at 43-50 Dolphins Barn Street and associated factory which make up the 3,243 sq.m of commercial space on the site noted by the Planning Authority are derelict buildings, and have not been in commercial use for a substantial period of time, therefore there is currently 0 sq.m of commercial space currently in operation on the subject site.

The LRD planning application report enclosed herewith discusses in detail why the scale/area of the previously proposed resident amenity spaces/communal facilities under DCC Reg Ref. 3853/17 / ABP-302149-18 have been reduced.

The current development proposal is for The Iveagh Trust, an Approved Housing Body, who are a not for profit housing organisation and do not manage commercial spaces. AHB's cannot have commercial/retail space along their ground floor due to their operational requirements, considering they are not a business and do not factor in commercial rates etc.

Alternatively, The Iveagh Trust collaborated with the design team, and it was concluded that two community hub spaces at ground floor level fronting Dolphins Barn Street offers a greater local benefit than providing commercial space, which would likely remain vacant if provided given the surrounding pattern of commercial occupancy along Dolphins Barn Street. The Iveagh Trust's motive is not profitability but rather to provide affordable housing for people who cannot afford to pay private sector rents or buy their own homes.

The provision of two separate generously spaced community hubs, serves to provide an appropriate interface between the subject development along Dolphin's Barn Road and the immediate adjoining public realm by providing vibrancy to the vacant streetscape. They can be multi-purpose, providing and hosting a range of activities and services in response to changing community needs.

The proposed development with its active frontage from both community hubs along Dolphin's Barn Street also creates a welcoming pedestrian environment, active public realm and further develops the sites relationship with the existing shops and services on Dolphin's barn Street and Cork Street. Activity from these community hubs will spill onto the street making the buildings edges active, which adds interest and vitality to the street environment. Active visual engagement between those in the street and those within the ground floor community hubs will further vibrancy, whilst providing informal surveillance opportunities that often improve the vitality and safety of an area. This will not only

promote passive surveillance but will also create an animated streetscape and enliven the Dolphin's Barn area.

The vision for the scheme is to create a unique sense of place with a strong community identity characterised by the ground floor community hubs, which will act as prominent focal point set within the area.

Additionally, the enclosed Planning Report and Community Infrastructure Audit discuss in detail the the provision of existing and proposed/permitted services in the vicinity and the impact of the proposed development on the surrounding area. It has been concluded that the area surrounding the site features a variety of services, facilities, and amenities within 500 metres as illustrated on figure 3 below. The subject site is located in an area with an established and significant range of employment hubs and social infrastructure.



Figure 3 – Context map

The site's location in an inner-city area means that it benefits from a significant range of social infrastructure, including civic, cultural, community, healthcare, and recreational facilities. There are also a number of schools, childcare facilities, and other educational services in the surrounding area. Considering this, the proposed development will support these existing facilities and will not put undue pressure on existing infrastructure.

Further details should be submitted in relation to how the proposal would comply with Objective CU025 of the current Dublin City Development Plan, which requires a minimum of 5% of the total floor area to comprise community, arts and culture spaces, to include exhibition, performance, and artist workspaces predominantly internal floorspace. The details should include details of consultation with Dublin City Council's Arts Officer.

Applicant Response:

In response to this Item, it is submitted that the proposed development complies with the requirements of CU025 as included within the Dublin City Development Plan 2022-2028. The development has a total gross floor area of 10467 sq.m and provides community hub space fronting Dolphins Barn Street at ground floor level of 523 sq.m, totalling 5% of the total development floorspace. It is submitted that the applicant and design team have gone to significant effort to adhere to this request from the Planning Authority, increasing the community hub space provided from 462.6 sq.m presented at S32B LRD meeting stage to now 523 sq.m, an increase of c. 61 sq.m

Representatives for the applicant have engaged with the DCC Arts Officers, Ray Yeates and Sinead Connolly, regarding the proposed ground floor community use provided.

It has been outlined to the Arts Officers that these two hubs will be operated by The Iveagh Trust and could be a multipurpose indoor space that can provide for, and host, a range of activities and be booked for use by arts organisations for classes, information events and demos, as well as used by the residents of the proposed residential element of the development. The DCC Arts department were supportive of this proposed use, and discussions between the applicant's representatives and the Arts Department are ongoing regarding potential local community arts organisations and clubs that could avail of the community space.

Having regard to Policy QHSN48 – Community and Social Audit and Section 15.8.2 – Community and Social Audit, a Social and Community Infrastructure Audit will need to be submitted as part of any Stage 3 application. The Audit of the surrounding area is vital for determining the quantum of existing amenities and demand for new community/cultural facilities in the locality. The audit shall provide an evidence base used to inform the proposed Community Hub in meeting the 5% community, arts and culture spaces requirements to justify the omission of cultural arts spaces having regard to Objective CU025 requirement to incorporate both cultural/arts and community uses.

Applicant Response:

In response to this Item, the LRD application now includes a Social and Community Infrastructure Audit, which provides information relating to the quantum of existing amenities and demand for new community/cultural facilities in the locality. The audit provides an evidence base used to inform the proposed Community Hub in meeting the 5% community, arts and culture spaces requirements. It is considered that the community hub space provided at ground floor level fronting on to Dolphins Barn street has the potential to be utilised as a cultural arts space, depending on the demand for this space from a local arts group. Discussions regarding the local community use of this space are ongoing with the DCC Arts Officers. It is expressly noted to Dublin City Council that it is unlikely that an agreement will be made with a local arts or community group to occupy this space prior to planning permission being granted and construction of the development commencing.

The proposed development has not included for a childcare facility. Section 15.8.4 of the City Development Plan requires all residential schemes (in excess of 75no. units) to provide a childcare facility. As part of the Social and Community Infrastructure Audit, a Childcare Needs Assessment will be required to be submitted having regard to Policy QHSN55 – Childcare Facilities and Section 15.8.4 – Childcare of the Development Plan.

Applicant Response:

As stated above, the LRD application now includes a Social and Community Infrastructure Audit, which includes a Childcare Needs Assessment. It's noted that the recommendation for new housing developments is the provision of 1 facility providing for a minimum 20 childcare places approximately 75 dwellings. The relevant guidelines state that if it is assumed 50% of units can be assumed to require childcare in a new housing area of 75 dwellings, approximately 35 will need childcare. However, one-bedroom units are not considered to contribute to the childcare provision under the new apartment's guidelines.

The proposed development is comprised of 119 no. new residential apartments. The following indicative summary mix is identified fir the total of 119 units:

- Total 1 Bed units: 70 no. (58.8%)
- Total 2 Bed units:49 no. (41.2%)

There are 19 no. childcare facilities currently operating in the Study Area with a maximum capacity of 1,164.

As outlined above, the development proposed has 58.8% 1-bed based unit types, which greatly reduced the number of children and families generally that will be present within this development. This in turn will reduce the demand created for childcare places. Having regard to this, the assessment of demand was based on what would be generated from the 2-bedroom units within the scheme. Calculating this out, it was concluded that the proposed development has the potential to require 5 no. childcare spaces for children aged 0-4.

All considered, it is submitted that there is no current requirement for the provision of additional childcare facilities to address the demand arising from the subject proposal.

We refer the Planning Authority to the submitted Community Infrastructure Audit for details.

Item 1.4 - Daylight and Sunlight

The submitted Daylight, Sunlight and Shadowing Assessment provides ADF, APSH and WPSH results for the units on ground, first and second floor levels. Results for all habitable rooms should be submitted in order to enable proper assessment.

Applicant Response:

In response to this Item, it is noted that the Sunlight and Daylight Assessment prepared by Chris Shackleton Consulting has examined the performance of the development on all habitable rooms. The below summarises the assessment in full:

Summary – Adjacent Properties

The assessment notes that neighbouring properties will generally not be affected by the proposed development and the impacts on Skylight, Sunlight and Shadow have been tested in accordance with the best practice guidelines.

The change/impact to neighbouring buildings in the adjoining residential areas was also tested against the granted but lapsed proposal under Reg. Ref. 3853/17 and ABP Ref. 302149-19 and the following was concluded:

- **Skylight- VSC**

- **96**% *(100% if marginals are included)* of tested windows pass the relevant VSC checks.
- Average VSC change ratio is nominal at 0.97
- The results are consistent with those of the granted/lapsed permission and the nett change to impact is neutral/positive.

- **Sunlight APSH & WPSH**

- **100%** tested windows pass the relevant Annual Sunlight APSH requirements.
- **83%** *(100% including negligible)* pass the relevant Winter Sunlight WPSH requirements
- The average change ratio for sunlight is APSH:**0.94** and WPSH: **1.73**

- **Shadow**

- **95%** *(100% including marginals)* of the Gardens tested comply with the BRE requirements
- The average change ratio for shadow/sunlight is **1.05**

Overall, the assessment concludes that the impacts of the proposed development are generally consistent with those of the granted but lapsed permission and may be classified as neutral/beneficial.

Summary - Development Performance

Performance of the proposed design -

- **Target Illuminance ET**
  - **97%** *(99% including marginals)* of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested.
  - The average compliant areas achieving the relevant target Lx for
    - all bedrooms is **86%** and
    - all Living/Kitchen spaces **68%**
    - both in excess of the required 50%

- **Sunlight to rooms:**
  - **76%** *(78% including marginals)* of Living rooms comply with the 1.5hr BRE test on the 21st March.
  - **This is generally consistent with the BRE defined "careful layout design" 80% target.**

- **Sunlight on the Ground SOG (Shadow)**
  - The new provided amenity space complies with the BRE 2hr requirements

The assessment concludes that the application generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice BR209 (Version 3, 2022) when considered in terms of an infill and regeneration project in an un-developed lot.

We refer the Planning Authority to the Sunlight and Daylight Assessment prepared by Chris Shackleton Consulting for details.

2.2 Item 2 - Drainage (Surface water management and flood risk)

Dublin City Council's Drainage Division recommends that the following items are addressed prior to lodgement of the final application:

The inclusion of green-blue roofs is welcomed however these could be improved upon to address biodiversity criteria; applicant asked to consider a deeper substrate rather than just the proposed sedum coverage.

Applicant Response:

The Engineering Services Report prepared by JJ Campbell and Associates refers to a 'Typical Parapet Blue with Green Roof Detail' drawing (dwg. no. DB-2024-01-01) prepared by Beton Construction Services Ltd., which has considered a deeper substrate rather than just the proposed sedum coverage by providing sedum and sedum substrate to be a minimum of 200mm to encourage biodiversity.

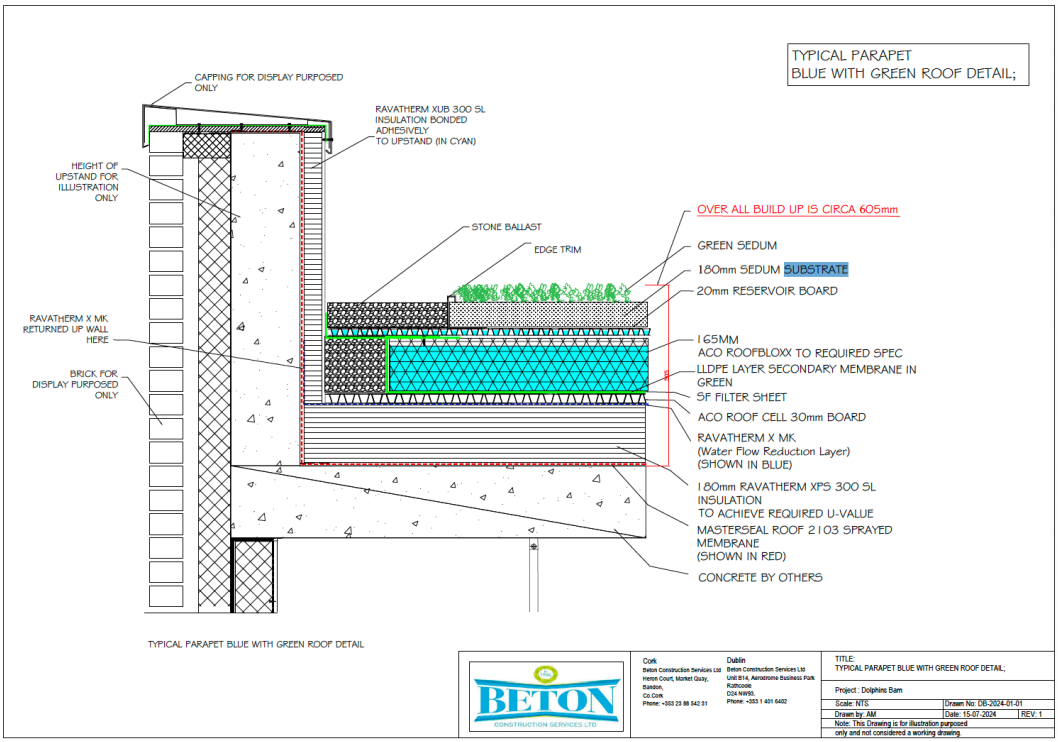


Figure 4 – 'Typical Parapet Blue with Green Roof Detail' - DB-2024-01-01 (extract from JJ Campbell and Associates Engineering Services Report)

SuDS tree pits are proposed as part of the surface water management strategy however these do not seem to be reflected as part of the Landscape proposals. Ensure clarity and consistency with approach. Also it is important that all SuDS elements are fully implemented as part of the development and not omitted during construction stage.

Applicant Response:

Please note that 6 no. SuDS tree pits are proposed as part of the subject development. It is proposed to install "GreenBlue" tree pits, which have 20% voids by volume, which reduces the size of the attenuation tank required. Tree pits minimum of 2m x 2m x 1.0Dp x 20% voids: 0.8m³ Storage each.

SuDS Tree Pit 01:	0.8m³
SuDS Tree Pit 02:	0.8m³
SuDS Tree Pit 03:	0.8m³
SuDS Tree Pit 04:	0.8m³
SuDS Tree Pit 05:	0.8m³
SuDS Tree Pit 06:	0.8m³
Total	4.8m³

Table 1 – SuDS Tree Pits (extract from JJ Campbell & Associates Engineering Services Report)

The project landscape architects Murray & Associates have reflected the SuDS tree pits proposed as part of the surface water management strategy in their 'Landscape Design – SuDS Strategy', as outlined by the orange outline (refer to Figure 5 below), which is included as part of the Landscape Design Statement.

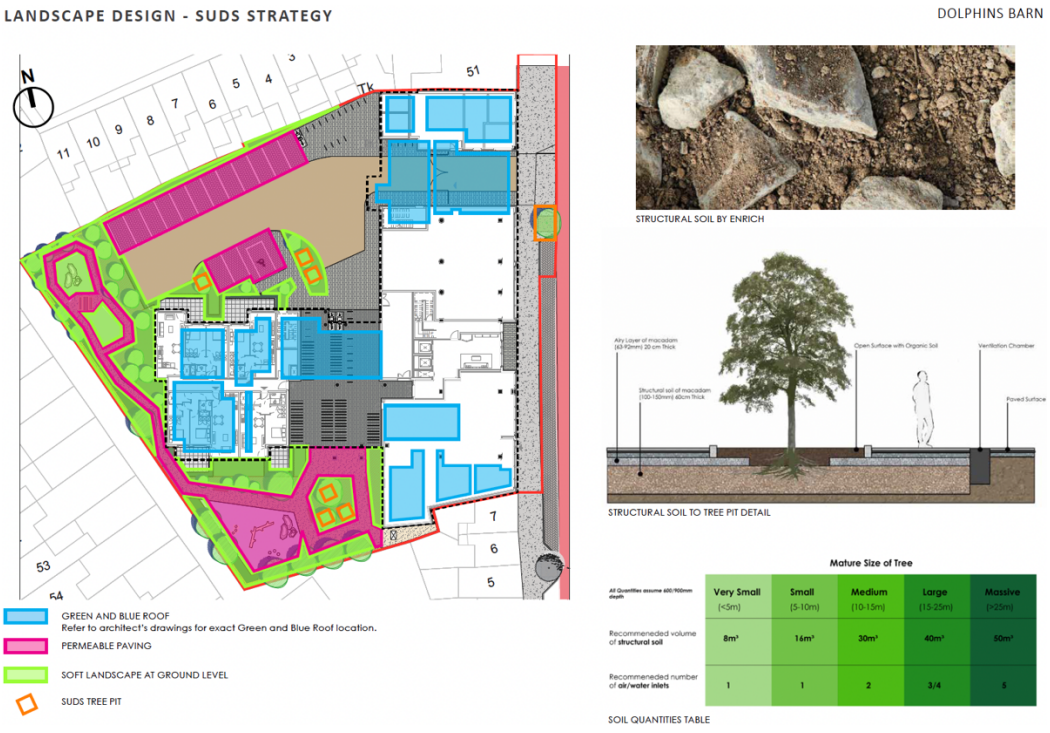


Figure 5 – 'Landscape Design – SuDS Strategy' (extract from Landscape Design Statement)

In addition to the above, please refer to the enclosed 'Landscape Masterplan' drawing prepared by Murray & Associates (dwg. no. 1923_PL_P_01), which locates the proposed SuDS tree pits by a blue outline and shading (refer to Figure 6).



Figure 6 - 'Landscape Masterplan' (extract from dwg. no. 1923_PL_P_01)

Moreover, all SuDS elements will be fully implemented as part of the development and not omitted during construction stage.

Please refer to the 'Landscape Design – SuDS Strategy', included as part of the Landscape Design Statement and the 'Landscape Masterplan' drawing (dwg. no. 1923_PL_P_01), prepared by Murray & Associates, and the Engineering Services Report prepared by JJ Campbell & Associates, enclosed herewith for additional information on the location of the SuDS tree pits proposed as part of the surface water management strategy.

Further clarity is required regarding the proposed surface water outfall MH and connection point. The practicality of proposed construction works on a heavily trafficked road is queried and a better design option may be possible. A separate off-line meeting is recommended to discuss details further.

Consultation with Drainage Planning is recommended prior to lodgement of any planning application.

Applicant Response:

Connection to DCC 225Ø Storm Sewer:

It is not possible to connect soffit to soffit from the outfall storm manhole to the DCC 225Ø storm because it clashes with the IW 300Ø foul sewer. It is proposed to use a ramp manhole to avoid the clash with the existing 300Ø combined sewer, see detail 1 and 1A on drawing C6. The start of the ramp is 257mm above the invert of the existing storm sewer. All to be confirmed when the road is opened and the exact levels of the existing 300Ø combined sewer and existing 225Ø DCC storm are determined. The proposed connection has been kept as deep as possible to avoid clashes with services in the path and road. A GPR survey to confirm existing services shall be carried out before the connection commences.

Construction of the Manhole / New Connection:

The existing DCC 225Ø storm sewer is located on the near side of Dolphins Barn Road, on the road heading into the city centre and on the same side as the proposed development. The existing storm manholes shown on the topographic survey confirm the existing storm sewer runs under the white line between the bus lane and cycle lane, see figure 01 below. Dolphins Barn Street is comprised of a cycle lane (1.3m), bus lane (3m) and a car lane (3.3) heading into the city centre. Heading out of the city centre there is a cycle lane (1.3m), bus lane (3.5m) and a car lane (3.5m). The overall width of Dolphins Barn Street at the proposed location for the new manhole is 15.9m. To construct the new storm manhole, it is proposed to temporally cordon off the cycle lane and bus lane heading into the city centre, diverting buses and cyclists around the proposed manhole and onto the car lane heading into town.The cycle lane, bus lane and car lane heading out of town are unaffected by the works. No temporary traffic signals or stopping of vehicle movements heading into town is required to construct the new storm manhole.

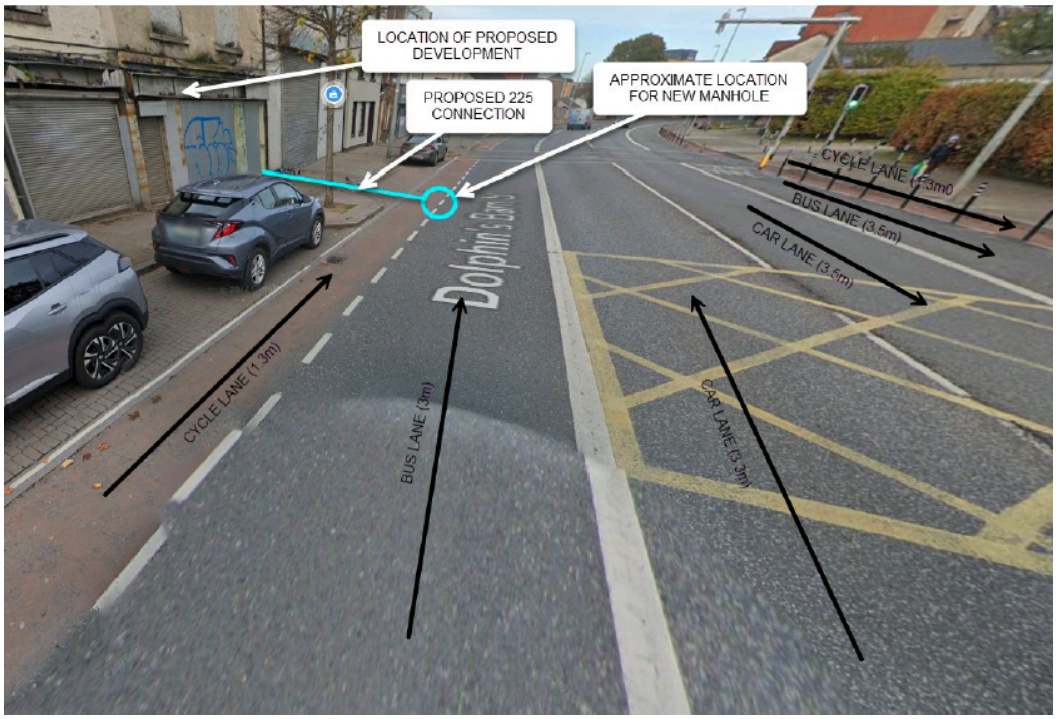


Figure 7 – Approximate location of proposed connection and storm manhole.

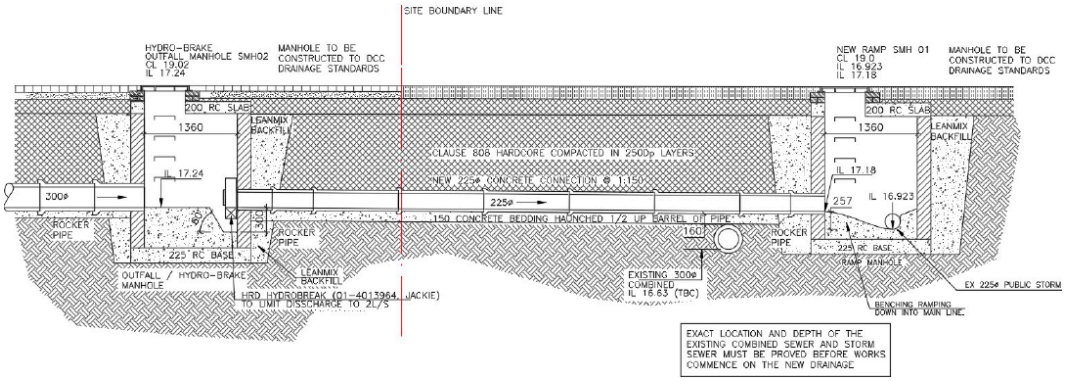


Figure 8 – Longitudinal section through connection, see detail 1 on drawing C6.

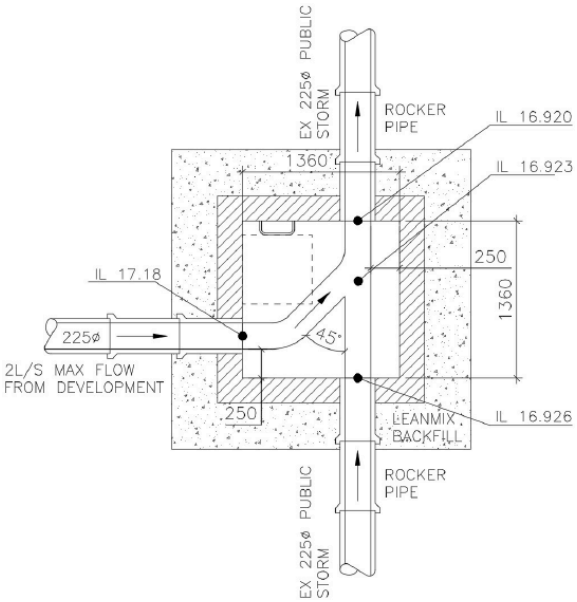


Figure 9 – Plan at new manhole SMH01 at DCC 225Ø Storm Sewer, see detail 1A on drawing C6.

Please refer to the the Engineering Service Report, prepared by JJ Campbell & Associates for additional information.

In response to Dublin City Council's request that the applicant consults the DCC Drainage Department prior to lodgement of an application, it is submitted that scheme drawings were sent by Marcus Wallace of JJ Campbell Civil and Structural Engineers to DCC Drainage via email for comment and review. No response was received from DCC Drainage.

2.3 Item 3 - Transportation

The Transportation Planning Division recommends that the following items be addressed prior to the submission of a planning application:

Item 3 – 1: Servicing and Operational Needs

1. **The use of Dolphins Barn Street to provide all servicing and operational needs for the development is not supported. There is concern with the obstruction of the public road and potential for conflict between service vehicles, pedestrians, cyclist and other road users. Having regard to the sites location on the NTA's Bus Connects Core Bus Corridor (CBC) Tallaght/Clondalkin to City Centre proposal and its proximity to The Coombe Hospital, there is no opportunity to serve the site from the public street. The applicant shall re-examine the proposed design to mitigate the impact, including the following:**
   - **(a) Facilitate an internal service/delivery/drop-off space within the proposed internal yard. A reduction in car parking would be supported by this division.**
   - **(b) Revised Plans and elevations shall ensure that sufficient height clearance is provided within the under croft to allow large vehicle types the access the internal yard. Auto tracking for a variety of large vehicle types is required.**
   - **(c) Provide a reception/concierge/mailbox drop-off facility within the site.**
   - **(d) An Operational Waste Management Strategy should be submitted, providing detail and clarity on waste access and collection proposals.**

Applicant Response:

In response to item (a) it is now submitted that the proposed scheme has been redesigned to facilitate servicing from the proposed internal yard area. This has resulted in the site entrance vehicular entrance point being relocated, from the south eastern portion of the site along Dolphins Barn Street as presented in the scheme submitted to Dublin City Council at S32B meeting stage, to now along the north eastern point of the site fronting Dolphins Barn Street.

15 no. car parking spaces are proposed for the scheme (12 no. standard for residents, 1 no. car sharing space for residents, 1 no. standard space for the community hub and 1 no. designated accessible space for the community hub). This level of car parking is considered wholly appropriate given that the site is located within Zone 1 as outlined in the DCC Development Plan 2022-2028, which constitutes the inner city area of Dublin, and is an area where parking standards can be relaxed, subject to accessibility to public transport. The proposal is located along a Core Bus Corridor due to be upgraded as part of BusConnects. This, in conjunction with the Planning Authority comment noting that a reduced level of parking would be supported at this location, has resulted in the final parking numbers proposed.

We refer to the scheme Architectural Drawings prepared by CWOB now submitted as part of this LRD application pack for details.

In response to item (b) we refer the Planning Authority to the Architectural Drawing Pack prepared by CWOB now submitted as part of this LRD application pack, which provides details of the site vehicular entrance point on the prepared elevational drawings.

In response to item (c) it is submitted that a mailroom and reception space is provided within the proposed development at ground floor level. We refer the Planning Authority to the Architectural Drawing Pack prepared by CWOB now submitted as part of this LRD application pack for details.

In response to item (d) an Operational Waste Management Plan has been prepared by AWN as part of this LRD application pack. We refer the Planning Authority to this submitted document for details.

Item 3 – 2: Discrepancies in submitted drawings and documentation regarding Cycle Parking

1. **There are discrepancies in submitted drawings and documentation in particular in regards to cycle parking proposals. The final application submission should be consistent across all drawings.**

Applicant Response:

In response to this Item, the design team have reviewed the cycle parking provision for the scheme and now confirm that this is accurately shown across all scheme documents. It is considered that this final application submission is now consistent across all submitted scheme documents.

Item 3 – 3: Detailed Design of the Vehicular Entrance Proposal

2. **Detailed design of the vehicular entrance proposals are required as follows:**
   - **(a) Clarity on the exact position of the entrance and proposed changed to the public domain, including changes to the existing on-street pay & display / permit parking bays and removal of existing / historical vehicular access.**
   - **(b) Any gates should be set back within the development to ensure cars do not obstruct the road or the footpath.**
   - **(c) A Road Safety Audit Stage 1 is required.**

Applicant Response:

In response to item (a) it is submitted that the exact position of the site entrance and changes to the public domain are detailed on the Architectural Drawings prepared by CWOB Architects now submitted as part of this LRD application pack.

The substandard existing on-street parking space between No.50 and the Toucan crossing will be omitted, with a standard height kerbline and footpath running straight along the cycle lane edge which will transition down at the new access crossover point (this requires removal of the existing tree in the granite kerbed buildout in front on No.49). The reason for bringing the new access crossover out to a dropped kerbline against the cycle lane is to avoid vehicles parking in front of/adjacent to the LRD access as can occur currently/historically, and so that there is better intervisibility between exiting traffic and cyclists/or bus and traffic lane users passing the access, and also improved intervisibility between vehicles turning in from the street and pedestrians walking along the footpath.

We refer the Planning Authority to the submitted drawing pack for details.

In response to item (b) it is submitted that the revised site entrance point allows for gated access to be provided within the site, which will avoid any potential for cars queuing on the public footpath or road.

In response to item (c) it is submitted that a Stage 1 Road Safety Audit has been prepared for the development by Traffico. All recommendations of the Road Safety Audit have been accepted by the

design team. We refer the Planning Authority to this prepared document now submitted as part of this application pack for details.

Item 3 – 4: Cycle Parking Clarification

3. **Cycle parking proposals requires review / clarification:**
   - (a) **The cycle parking provision should be reviewed, clarification on the discrepancy between the number of proposed cycle spaces and the spaces shown on submitted layouts.**
   - (b) **The cycle parking provision should be reviewed, having regard to standards, community staff number should be provided to allow a complete assessment of the cycling requirements.**
   - (c) **The community use and residential use cycle parking should be separated/**
   - (d) **Secure long term parking spaces are required, long term parking should not all be two-tier cycle stands, a proportion should be in a single stand arrangement.**
   - (e) **Relocation of visitor parking within the site which is currently places at the hammerhead.**
   - (f) **Provision of cargo bike parking, guidance of 5% of the total cycle parking spaces to accommodate non-standard cycles as recommended in the Cycle design Manual.**
   - (g) **Full details of the location; type of provision and quantum of provision shall be provided at application submission stage to allow for a full assessment of the proposals. The applicant shall consult the Cycle Design Manual.**
   - (h) **Detailed drawings of the bicycle stores demonstrating that adequate height and separation distance is provided for ease of accessibility and functionality of the compounds, ensuring ease of access/egress including sufficient space is incorporated (2.0m – 2.5m varies with design of the stand pivot to the front of each rack for access of two-tier stands should be submitted as the proposal appears constrained in places.**

Applicant Response:

In response to item (a) it is submitted that the cycle parking provision for the scheme has been reviewed, and discrepancies between the number of cycle parking spaces shown between plans has been amended. We refer the Planning Authority to the submitted Planning Drawing packs now submitted as part of the LRD application pack for details.

In response to item (b) it is submitted that the proposed cycle parking arrangement for the residential and community hub element of the development has been reviewed and complies with standards as outlined in the Apartment Guidelines and the Dublin City Development Plan 2022-2028.

In response to item (c) it is submitted that the cycle parking provided for the residential and commercial element of the development has now been separated. We refer the Planning Authority to the Architectural Drawing Pack prepared by CWOB Architects for details.

In response to item (d) it is submitted that an element of cycle parking provided is in a single tier stand arrangement as per the request of the Planning Authority. We refer the Planning Authority to the Architectural Drawing Pack prepared by CWOB Architects for details.

In response to item (e) it is submitted that the revisions to the site entrance point and layout have allowed the cycle parking arrangement to be updated, removing any proposed cycle parking from a hammerhead element of the development. We refer the Planning Authority to the Architectural Drawing Pack prepared by CWOB Architects for details.

In response to item (f) it is submitted that 3 no. cargo bicycle parking spaces are proposed as part of the development. It has been confirmed by the Iveagh Trust that this level of provision is wholly appropriate, as the tenants of their developments do not typically avail of this typology of cycle parking when available.

In response to item (g) it is submitted that full details of the type, location and quantum of cycle parking spaces proposed as part of the development is shown within the Architectural Drawing Pack, and accompanying schedule of accommodation prepared by CWOB Architects. We refer the Planning Authority to these documents for details.

In response to item (h) it is submitted that details of the proposed bicycle parking arrangements have been provided by CWOB Architects within the submitted Architectural Drawing Pack and accompanying Design Statement. We refer the Planning Authority to these documents for details.

Item 3 – 5: Car Parking Clarification

4. **Car parking provision requires review / clarification.**
   - (a) **The proposed residential car parking provision is considered an undersupply at this location. The proposed community car parking provision is considered an oversupply at this location. In-light of the requirements for servicing to take place from within the site, the applicant shall re-examine the design, layout and car parking quantum to ensure servicing can take place from within the site and that no car parking spaces be assigned for community use.**
   - (b) **EV charging proposals updated shall have regard to the Development Plan 2022-2028 standards, and proposals updated to reflect this. Details of EV charging alongside details of proposed designs which accommodate EV charging infrastructure will be required at final application stage.**
   - (c) **A more detailed car-parking management strategy should accompany the application submission, paying particular attention the car share management. Furthermore, the plan should include clear provisions to ensure that visitors to the community centre do not park in residential areas, thereby preserving these spaces exclusively for residents and preventing any overlap between the two parking facilities.**
   - (d) **A minimum of 1no. motorcycle parking spaces should be provided as outlined in Section 6.0 of Appendix 5 of the Dublin City Development Plan 2022-2028.**

Applicant Response:

In response to item (a) it is considered by the applicant and design team that the now proposed car parking arrangement for the scheme is wholly appropriate to cater for the demand arising from the residential and community hub elements. Whilst the Planning Authority note here that the proposed car parking represented an undersupply, it was also noted by the Planning Authority within the LRD Opinion issued that they would allow for a reduction in car parking provision here if the site could be serviced internally. The revised scheme design now submitted as part of this LRD application pack allows for all servicing to take place within the site boundary, and therefore the car parking provision

of 12 no. spaces for the residential element, 1 no. spaces for the community hub element, 1 no. accessible car parking space and 1 no. car sharing space should be considered wholly appropriate. The site is located within Zone 1 as noted in the Dublin City Development Plan, which allows for a reduction in car parking at city centre locations close to public transport links. The site is located along Dolphins Barn Street, which is a Core Bus Corridor due to be upgraded as part of BusConnects.

In response to item (b) 8 no. of the 15 total car parking spaces provided are shown as EV charging spaces, or 53%, in line with the DCC requirement for 50% of car parking spaces in new developments to be equipped with EV charging infrastructure.

In response to item (c) a Traffic and Transport Assessment and Residential Travel Plan has been prepared by Stephen Reid Consulting in respect of the proposed development, which details traffic management and mobility management measures incorporated into the scheme design. We refer the planning authority to these submitted documents for details. It is submitted that the Iveagh Trust will operate the development once constructed and will manage the car parking area. Access to the car parking area will be via controlled gates, so only those permitted to enter the development site by the Iveagh Trust will be able to access and park in the proposed car park.

In response to item (d) it is submitted that no motorcycle parking space is provided as part of the proposed scheme. The applicant and design team submit that all of the 15 no. standard car parking spaces are available to be used by motorcycle users if required.

Item 3 – 6: Trip Rates and TRICS Analysis Clarification

1. **Trip rates and TRICS analysis requires review / clarification. There appears to be errors within the calculations included in Section 4.3. No TRICS data has been submitted in the appendix, this should be included. AM and PM peak flows for the proposed development should be provided.**

Applicant Response:

In response to this item it is submitted that revised Trip Rates and TRICS calculations have been prepared by Stephen Reid Consulting as part of the Traffic and Transport Assessment now submitted as part of this Planning application pack. We refer the Planning Authority to this submitted document for details.

Item 3 – 7: Additional Reports Required

2. **The applicant shall prepare and submit the following reports as per the requirements of Table 15-1 of Chapter 15 of the City Development Plan 2022-2028:**

   (a) **Operational Management Statement / Plan**
   (b) **Traffic and Transport Assessment**
   (c) **Mobility Management Plan / Travel Plan Road Safety Audit**
   (d) **Service Delivery and Access Strategy**
   (e) **Construction Management Plan**
   (f) **Construction Demolition Waste Management Plan**
   (g) **Operation Waste Management Plan**

Applicant Response:

In response to this Item, the LRD application now provides the following:

Document	Consultant
Operational Management Statement/ Building Lifecycle Report	Brock McClure Planning & Development Consultants
Traffic and Transport Assessment (Including Service Access and Delivery Strategy)	Stephen Reid Consulting
Residential Travel Plan	Stephen Reid Consulting
Road Safety Audit	Traffico
Construction Management Plan	JJ Campbell
Construction Demolition Waste Management Plan	JJ Campbell
Operational Waste Management Plan	AWN

We refer the Planning Authority to the above noted documents for details.

2.4 Item 4 - Conservation Officer

Having been neglected for a number of years, it is clear that the buildings fronting on the dolphin's Barn Street are in poor condition. Despite this, the Conservation Officer finds that it would be regrettable to condemn the historic row in its entirety given the age of the buildings and clear architectural and social significance.

The Conservation Officer recommends that an updated architectural heritage impact assessment be produced for the historic terrace.

Applicant Response:

In response to this Item, the LRD application now provides a Heritage Impact Assessment, prepared by Tom McGimsey of Mesh Architects. This report provides an assessment of the buildings at 43-49 Dolphins Barn Street, which exist along the site eastern boundary. The report concludes that all of the subject structures are currently in extremely poor structural condition. All of the roof and internal structures have been severely compromised by rainwater penetration into the timber elements, resulting in collapsing roofs and floor structures. In many of the structures, woody plants have been allowed to grow unchecked in the valleys and chimneys, causing localised damage to the masonry. The external front and rear walls, and shared party walls, appear to be relatively stable, however some of the ground floor shopfronts are supported by rotted timber beams and rusted steel beams. Some of the former houses have received steel tie beams to their front elevation, to prevent outward movement. While some historic brick and stone masonry walls survive in the party walls, and in some of the front and rear walls, it is clear that many of the front and rear walls have been heavily altered or totally replace with later materials.

Given the early 18th century origins, and relatively small scale of the subject structures, the design of the roof structures would have most likely consisted of steeply pitched double pitched roofs, with the principal ridge perpendicular to the front elevation, with shared valleys over the party walls. The front and rear elevations could have had prominent gables, following the typology currently referred to as a Dutch Billy. Virtually no fully intact examples of such structures have survived in Dublin from the first half of the 18th century, however many have survived with later modifications that have obscured their original gabled appearance. The extent to which the subject structures have been modified and reconstructed is to be regretted.

Internally, all of the structures were converted to commercial shops at the ground floor, with varying degrees of internal modifications to accommodate that use. Some of the former houses have retained large corner chimney breasts, a feature that is typically indicative of houses dating from prior to the middle of the 18th century. In others, there are no corner fireplaces at all.

Of the seven individual structures that comprise the subject terrace, it is believed that all but No. 48 contain building fabric that predates the publication of the first edition of the Ordnance Survey for that area of Dublin. No. 48 was completely replaced by a new structure between 1866 and 1888. Nos. 43 and 45 retain external walls and party walls that mostly likely predate 1843, however their roofs and all internal walls and floors have been removed, including the angled chimney breasts, and replaced during the mid to late 20th century. Nos. 47 and 49 have been largely stripped out and rebuilt during the 20th century, but have retained angled chimney breasts. No. 44 was largely rebuilt internally during the early 19th century, but appears to have retained its historic internal plan including large angled chimney

breasts that likely date to second quarter of the 18th century. Its pitched roof was removed during the 20th century.

All of the structures are currently in very poor condition, with roofs and floors subering from damp rot and structural collapse. The extent to which the significant historic 33 internal fabric, including stairs, doors, moulded joinery, and plaster linings, have been removed or irreparably damaged, would severely limit any attempt to reinstate the houses to an accurate or authentic representation of early 18th century vernacular houses. The final result of such a restoration would entail a high degree of conjecture and result in structures largely devoid of authentic early 18th century fabric. The currently dangerous condition of most of the internal areas in the terrace have made a full photo or measured survey impossible to carry out safely. Additional significant evidence of early architectural materials and details would likely be exposed for documentation during the demolition of the houses. It is proposed that the project's Conservation Advisor be aborded the opportunity to monitor the demolition, and to be allowed to gather such evidence by photo and measured survey, and also to salvage any significant features or materials that are exposed. In addition, additional archival will be carried out to bring the original construction dates for the houses into clearer focus.

2.5 Item 5 – Archaeology

The applicant should address the following concerns of the City Archaeologist within the final application documentation:

- **The proposal to demolish historic buildings of social and historical interest is not justified and is contrary to Policy BHA6 of the Dublin City Development 2022-2028. A conservation report should be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report this it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).**
- **The documents submitted do not include an archaeological assessment of the subject site.**

Applicant Response:

In response to this Item, the LRD application now provides a Heritage Impact Assessment, prepared by Tom McGimsey of Mesh Architects. This report provides an assessment of the buildings at 43-49 Dolphins Barn Street, which exist along the site eastern boundary. We refer the Planning Authority to section 2.4 above, which provides a summary of the conclusions of this report, and to the full report now submitted as part of this LRD pack.

In respect of an Archaeological Assessment, it is submitted that the following condition was attached to the grant of permission issued on the site by DCC under DCC Reg Ref. 3853/17, as condition no. 22:

a) No construction or site preparation work may be carried out on the site until all archaeological requirements of the City Archaeologist are complied with.

b) The project shall have an archaeological assessment (and impact assessment) of the proposed development, including all temporary and enabling works, geotechnical investigations, e.g. boreholes, engineering test pits, etc., carried out for this site as soon as possible and before any site clearance/construction work commences. The assessment shall be prepared by a suitably qualified archaeologist and shall address the following issues. i. The archaeological and historical background of the site, to include industrial heritage. ii. A paper record (written, drawn, and photographic, as appropriate) of any historic buildings and boundary treatments, etc. iii. It is recommended that a programme of test trenching be carried out within the site following demolition and clearance of the standing buildings. The testing will investigate the potential for survival of remains associated with the former post-medieval tannery yard, 18th century buildings and any pre-existing medieval activity. Test trenching should be carried out by a suitably qualified archaeologist under licence to the National Monuments Service and in consultation with the Dublin City Archaeologist. Dependant on the results of the assessment further mitigation may be required, such as the preservation of any archaeological deposits that may be identified either in situ or by record (i.e. excavation) and following consultation with the National Monuments Service and the Dublin City Archaeologist. iv. It is recommended that the terrace of houses 43-49 Dolphin's Barn Road be subject to a written and photographic survey by a qualified historic buildings expert to assess the potential for any surviving early structural fabric. Further mitigation may arise from this survey, such as a measured survey or archaeological monitoring. v. It is recommended that all ground disturbances associated with the proposed development, including site investigations, be monitored by a suitably qualified archaeologist. vi. The impact of the proposed development on such archaeological material.

c) The archaeologist shall forward their Method Statement in advance of commencement to the City Archaeologist.

d) Where archaeological material is shown to be present, a detailed Impact Statement shall be prepared by the archaeologist which will include specific information on the location, form, size and level (corrected to Ordnance Datum) of all foundation structures, ground beams, floor slabs, trenches for services, drains etc. The assessment shall be prepared on the basis of a comprehensive desktop study and, where appropriate/feasible, trial trenches excavated on the site by the archaeologist and/or remote sensing. The trial trenches shall be excavated to the top of the archaeological deposits only. The report containing the assessment shall include adequate ground-plan and cross-sectional drawings of the site, and of the proposed development, with the location and levels (corrected to Ordnance Datum) of all trial trenches and/or bore holes clearly indicated. A comprehensive mitigation strategy shall be prepared by the consultant archaeologist and included in the archaeological assessment report.

e) No subsurface work shall be undertaken in the absence of the archaeologist without his/her express consent. The archaeologist retained by the project to carry out the assessment shall consult with the City Archaeologist in advance regarding the procedure to be adopted in the assessment.

f) A written and digital report (on compact disc) containing the results of the archaeological assessment shall be forwarded on completion to the City Archaeologist. The City Archaeologist (in consultation with The National Monuments Service, Department Arts Heritage and Gaeltacht, shall determine the further archaeological resolution of the site.

g) The developer shall comply in full with any further archaeological requirement, including archaeological monitoring, and if necessary archaeological excavation and/or the preservation in situ of archaeological remains, which may negate the facilitation of all, or part of any basement.

h) The developer shall make provision for archaeological excavation in the project budget and timetable.

i) Before any site works commence the developer shall agree the foundation layout with the City Archaeologist.

j) Following submission of the final report to the City Archaeologist, where archaeological material is shown to be present the archaeological paper archive shall be compiled in accordance with the procedures detailed in the Dublin City Archaeological Archive Guidelines (2008 Dublin City Council), and lodged with the Dublin City Library and Archive, 138-144 Pearse Street, Dublin 2.

Reason: In the interest of preserving or preserving by record archaeological material likely to be damaged or destroyed in the course of development

The applicant welcomes a condition worded the same or similarly to the above, to ensure that the requirements of the City Archaeologist are met prior to, and during construction.

3 CONCLUSION

This report, read in conjunction with Design Team's accompanying reports and drawings addresses, in full the issues raised by the Planning Authority in the LRD Opinion dated the 25th of September 2024.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of this area, and we trust that the above report and enclosed documentation fully addresses the issues raised in DCC's LRD Opinion.

All relevant details are further addressed in the revised design, now proposed and we ask the Planning Authority to refer to the complete application package for full details of the proposal now put forward.