McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

Response to An Bord Pleanála Pre-application Consultation Opinion

Proposed Strategic Housing Development at the Former Bailey Gibson Site, 326-328 South Circular Road, Dublin 8

May 2020

Prepared on behalf of DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV

www.mhplanning.ie

DUBLIN
Kreston House, Arran Court
Arran Quay, Dublin 7
D07 K271
T. +353 (0) 1 804 4477
E. info@mhplanning.ie

CORK
6 Joyce House, Barrack Square
Ballincollig, Co. Cork
P31 YX97
T. +353 (0)21 420 8710
E. info@mhplanning.ie

Document Control Sheet

Client	**DBTR-SCR1 Fund, a Sub-Fund of the CWTC Multi Family ICAV**			
Project Title	SHD Bailey Gibson			
Document Title	Response to Pre-application Consultation Opinion			
Document No.	3830			
Document	DCS	TOC	Text	Appendices
Comprises	1	1	14	0
Prepared by	MKR	**Checked by**	PG	

Rev.	**Status**	**Issue Date**
A	FINAL	18.05.20

Table of Contents

1. Introduction

1.1 Introduction

This report addresses the 9 no. specific information requirements requested by An Bord Pleanála (ABP) in their Notice of Pre-Application Consultation Opinion (case ref. ABP-306472-20) issued on the 20th March 2020 in relation to the proposed strategic housing development (SHD) at the former Bailey Gibson Site, South Circular Road, Dublin 8.

2 Statement of Response to Specific Matters

2.1 Design / Height Rationale

A report, including CGI's, visualisations and cross sections, as necessary, which clearly show the relationship between the proposed development and existing development in this vicinity. Details should include rationale/justification for the heights/setbacks proposed; boundary treatments; public realm and ground floor elevation treatments. Documents should also include details showing the relationship between the proposed heights and any future development on adjacent lands.

The rationale for the design/height of the proposed development, taking account of boundary treatment, setbacks, public realm and ground floor elevational treatment is set out in the **Architectural Design Statement** prepared by Henry J Lyons that accompanies this application under separate cover.

In brief, the proposal adopts the building height rationale established in the SDRA framework plan and developed in the SDRA Masterplan. The design principle develops a sensitive and appropriate scale at the interface of the SDRA lands with surrounding existing residential neighbourhoods and increases the scale of development, as appropriate, towards the centre of the masterplan.

Section 4.5 (Building Height Rationale) of the **Architectural Design Statement** documents the proposal's massing strategy with particular reference to the sensitive boundary interfaces. With regard to relationships with future masterplan developments, **Section 4 (High Level Design & Layout)** of the **SDRA Masterplan** documents these interface relationships, specifically Sections 4.1 Proposed Layout, 4.4 Building Heights Rationale, 4.6 Visual Impact and 4.7 Overshadowing and Sunlight Access.

Activation of the ground floor has been carefully considered with the aim to bring life and oversight to the streets and courtyards, **Section 4.4 (Street and Courtyard Activation)** of the **Architectural Design Statement** sets out how animation is achieved.

Computer generated images (CGIs) are contained within the Architectural Design Statement to assist the planning authority and interested parties to visualise the proposed scheme.

A **Landscape & Visual Impact Assessment** is contained in the Environmental Impact Assessment Report (EIAR) that accompanies this application. The assessment of townscape and visual impacts is based on a suite of **Photomontages** prepared by Modelworks, submitted under separate cover. The photomontages include near, medium and long distance views and each viewpoint is shown as (i) existing view, (ii) existing and proposed development and (iii) existing, proposed development and wider Masterplan development.

2.2 Residential Amenity

A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically with regards to overlooking, overshadowing, overbearing and noise. The report

shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and adjoining residential development. Furthermore, landscape and architectural drawings that clearly detail the relationship between wind impact mitigation measures and the design of the proposed development shall be included.

A **Daylight, Sunlight and Overshadowing Study** has been prepared by Integrated Environmental Solutions (IES) and is submitted under separate cover.

With regard to overshadowing, the assessment concludes that there is minimal overshadowing from the proposed development due to the considered architecture along the west side (along Rehoboth Place/Avenue) where the potential for overshadowing to existing buildings is greatest. The impact is categorised in accordance with BRE Guidelines as minor adverse.

According to the BRE's Site Layout Planning for Daylight and Sunlight for a space to appear adequately sunlit throughout the year, at least half of the garden or amenity area should receive at least 2 hours of sunlight on the 21st of March. The assessment submitted with this application demonstrates that on the 21st of March, all of the proposed amenity areas would receive at least 2 hours of sunlight and all areas exceed the BRE recommendations with individual amenity spaces ranging from 53% to 100%.

An average daylight factor (ADF) assessment has been undertaken and 101 no. 'worst case' locations have been tested. The analysis demonstrates that 96% of the proposed rooms tested are achieving ADFs above the BRE guidelines. This percentage across the scheme would be expected to increase further if all upper rooms were included in the results.

In **Section 4.6 (Building Height Rationale)** of the **Architectural Design Statement**, matters relating to overlooking, overshadowing and overbearing impacts and how these are mitigated through the design process are addressed. The relevant drawings that should be referenced with regard to residential amenity are;

- **Drawing No. PL3001 SECTIONS BAILEY GIBSON SITE SHEET 1 OF 4**
- **Drawing No. PL3002 SECTIONS BAILEY GIBSON SITE SHEET 2 OF 4**
- **Drawing No. PL3003 SECTIONS BAILEY GIBSON SITE SHEET 3 OF 4**

A **Noise and Vibration Impact Assessment** is included in the EIAR that accompanies this application. Mitigation measures are proposed for both the construction and operational phases. The residual impacts for the construction (including demolition) phase are assessed as;

"During the demolition and construction phase of the project there is the potential for temporary noise impacts on nearby noise sensitive properties due to noise emissions from site activities. The application of binding noise limits and hours of operation, along with implementation of appropriate noise and vibration control measures, will ensure that noise and vibration impact is kept to a minimum as far as practicable. For the duration of the demolition and construction period, construction noise impacts will be short-term, negative, slight to significant, depending on the proximity of the works to the site boundary."

The assessment considers operational noise impacts including noise sources such as building services plant, deliveries and additional traffic generated by the scheme. Post mitigation the assessment concludes that the noise impact will be neutral (an effect within the normal bounds of variation) with a significance that ranges from imperceptible (an effect capable of measurement but without significant consequences) to not significant (an effect that causes noticeable changes in the character of the environment but without significant consequence). All residual impacts will have a permanent duration.

A **Pedestrian Wind Comfort Report** prepared by IES accompanies this application under separate cover. Both design and landscape mitigation measures are proposed for sitting and standing comfort and this has

been integrated into the proposed development. The measures introduced on foot of the analysis are illustrated on the following drawings;

- **Drawing No. PL2002 CONTIGUOUS ELEVATIONS 05+06 SHEET 3 OF 4**

With regard to walking comfort, the assessment demonstrates that the proposed development meets the relevant Lawson criteria for leisure and business walking. Accordingly, mitigation is not proposed.

Regarding safety criteria, the proposed development shows good compliance with the relevant Lawson criteria and mitigation is not proposed.

The proposed landscape design ensures there are no seating or gathering areas positioned within zones that were shown to be outside of the identified "comfortable" standing or sitting thresholds in all seasons. All other landscape zones where seating areas, gathering spaces or private terraces have been delineated are within the "Comfort threshold" as outlined within the **Pedestrian Wind Comfort Report** prepared by IES.

The landscape in general seeks to include as much vegetation as practically possible, incorporating hedges, trees and shrubs, to mitigate wind exposure within the public and private realm. The BG2 rooftop courtyard employs devices such as trellis, climbing plants and hedges to mitigate wind exposure while allowing light into the space. Please refer to the following for details of the proposed landscaping incorporating mitigation measures:

- **Chapter 05 of the Landscape Design Statement - Landscape Design - Residential Courtyard BG2 Block (Podium) and Landscape**
- **Drawing No. L1-501 - LANDSCAPE PLAN**

2.3 Area Schedule

A schedule of floor areas for all proposed units which includes for, inter alia, details of aspect (single, dual, triple) of each unit, storage space and private open space provision.

The **Housing Quality Assessment** includes a **Schedule of Accommodation** that addresses all the matters set out above.

2.4 Landscape Plan

A detailed landscaping plan for the site which clearly differentiates between areas of public communal and private open space and which details exact figures for same. Details should also include proposals for hard and soft landscaping including street furniture, where proposed, which ensures that areas of open space are accessible, usable and available for all. Pedestrian permeability through the site should be outlined. Details of the interface between private and communal areas should also be detailed. Additional cross sections, CGI's and visualisations should be included in this regard.

2.4.1 The Landscape Plan

The **Landscape Design Statement** that accompanies this application under separate cover sets out comprehensive proposals for hard and soft landscaping, please refer to Section 05 – Landscape Design for the overall Illustrative plan which gives an overview of the landscape design.

Please refer to the following drawing for details which clearly delineate types of soft and hard landscape;

- **Drawing No. L1-501 - LANDSCAPE PLAN**

CGI's and visualisations are incorporated into the Landscape Design Statement in order to describe the character and effect of the public and communal open space.

2.4.2 Communal/Public Open Space Plan

Please refer to communal open space diagram of **Section 04 – Landscape Diagrams** of the **Landscape Design Statement**, which clearly delineates areas of public realm, communal open space and private open space. The character and design of these spatial typologies are described throughout the **Landscape Design Statement**.

2.4.3 Proposals for Hard and Soft Landscaping

Please refer to the following drawing which delineates the quantum of hard and soft landscape throughout the site;

- **Drawing No. L1-501 - LANDSCAPE PLAN**

This drawing is to be read in conjunction with the Hard and Soft Landscape Palette found within the **Landscape Design Statement** (Sections 06 and 07 respectively).

2.4.4 Hard Landscape Strategy

Materials have been chosen to be both robust and timeless, provide texture and tone for visually impaired, to tie into the surrounding pubic realm while also seeking to provide integrated intuitive wayfinding. The proposed material palette can be found within **Section 06 - Hard Landscape Strategy** of the **Landscape Design Statement** which also sets out the strategy for hard landscaping at the site. Street furniture has been selected to adhere to an age friendly seating strategy, incorporating backs on seats with arm rests, all located at intervals for rest stops. A street furniture palette is also outlined in **Section 06 – Hard Landscape Strategy** of the **Landscape Design Statement.** Please refer to the following drawing for indicative hard landscape details;

- **Drawing No. L-901-2 – LANDSCAPE DETAILS**

2.4.5 Accessibility

Throughout every stage of the design process accessibility has been at the forefront of the design team's considerations. This ensured that every public and communal open space within the scheme is completely accessible, usable and available for all, including persons visually and mobility impaired. Tactile paving is proposed adjacent to street crossing points, as well as the edges of shared surface roads. Street furniture is positioned "out of the way" to ensure it doesn't form an obstruction to anyone visually impaired. Slopes and gradients are designed to be no more than 1:21 slope gradient to ensure slopes are manageable for people who are physically impaired. Railings and bollards are used to appropriately segregate public and private uses, as well as vehicular and pedestrian traffic.

Please refer to the following landscape drawing which clearly sets out the proposed levels and materials across the site within both the public realm and private open space areas;

- **Drawing No. L1-501 – LANDSCAPE PLAN**

2.4.6 Soft Landscape Strategy

The soft landscape materials proposed are easy to maintain and resilient to the Irish climate. Many plants from the Ireland 2020 Pollinator Plan were chosen for inclusion in the Bailey Gibson plant palette. Plants were also chosen for the scale of planting and to respond to the scale of space .Trees were selected to create character

and differentiate one space / street from another in a clear hierarchy, as well as their ability to cope with inundation with water as most of the tree pits are 'Bio-Retention' tree pits.

Please refer to the detail within **Section 06 – Hard Landscape Strategy (SUDS Tree Pits)** of the **Landscape Design Statement**. Extensive consultation has been undertaken with Dublin City Council Parks Department to develop Tree Pit Details to ensure that the landscape infrastructure proposed at the Bailey Gibson site is durable and forms part of Dublin's public realm for many years.

The proposed plant palette can be found within **Section 07 - Hard Landscape Strategy** of the **Landscape Design Statement**.

2.4.7 Pedestrian Permeability

Pedestrian permeability through the site is outlined in the permeability diagram within **Section 04 – Landscape Diagrams (Access and Circulation)** of the **Landscape Design Statement**. The diagrams clearly depict anticipated pedestrian routes through the proposed development and connections to destinations within the surrounding context. The diagrams also highlight nodes/destinations within the site and clear delineation of routes to the nodes/destinations.

2.4.8 Interface Between Private and Communal Areas

Section 05 - Landscape Design - Public Realm and Streetscape within the **Landscape Design Statement** sets out and details the interfaces between private landscape (mostly private amenity spaces or terraces or front gardens) and the public realm. In most instances, the private open space (terrace) is separated from the public realm by a railing and a hedge or other planting. This is to ensure that the ground floor dwellers have a sufficient feeling of privacy within their home. Studies have proven that a front garden or private terrace opening onto the street has a positive influence on social interaction and passive surveillance of the streetscape (2001, Gehl, Jan). In several instances, ground floor dwellers have own door access. In all instances, the ground floor units can be accessed via the interior core of the building as well.

Within the semi-private courtyards, the delineation of private space is equally as important. **Section 05 Landscape Design (Courtyards)** of the **Landscape Design Statement** outlines the design principles which guide how private terraces within the courtyards are separated from the communal uses within the courtyards. The design of the semi-private courtyards also follows similar design principles which are set out within Section 05 and are individually described later in the chapter under the following headings:

- **05 Landscape Design - Residential Courtyard BG 1**
- **05 Landscape Design - Residential Courtyard BG 2 (Podium)**
- **05 Landscape Design - Residential Courtyard BG 3**
- **05 Landscape Design - Residential Courtyard BG 4**

The scheme sets out a clear hierarchy of private, communal and public open space in a way that will ensure all open spaces are owned and taken care of. An outline landscape maintenance proposal is set out within the appendix of the **Landscape Design Statement**. It is understood that the public streets will be taken into management by Dublin City Council Roads and/or Parks Department.

The interface between the communal open spaces and public realm will be delineated by a railing and secure gate system. The detail of such gate and railing can be found on the following drawing;

- **Drawing No. L1 – 901-3 – Landscape Details Sheet 3**

2.4.9 Boundary treatments

The existing boundary conditions vary across the site. In some instances, the site is backing onto existing properties or walls. Please refer to the following landscape drawings for full details of the various boundary treatments proposed within the development site.

- **Drawing No. L1-800-2 Site Boundary Condition Plan**
- **Drawing No. L1-801 Site Boundary Sections 1 of 3**
- **Drawing No. L1-802 Site Boundary Sections 2 of 3**
- **Drawing No. L1-803 Site Boundary Sections 3 of 3**

2.5 Construction and Demolition Waste Management Plan

Site Specific Construction and Demolition Waste Plan

A **Construction and Demolition Waste Management Plan** prepared by Barrett Mahony Consulting Engineers accompanies this application under separate cover. We would also draw An Bord Pleanála's attention to the **Construction Management Plan** prepared by Garland Consulting Engineers included with the application.

2.6 Surface Water Management / Flood Risk Assessment

Additional details in relation to surface water management for the site, having regard to the requirements of the Drainage Division (undated report) as indicated in the Planning Authority's Opinion. Any surface water management proposals should be considered in tandem with a Flood Risk Assessment specifically relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk.

In response to the Drainage Division's report, the **Civil Engineering Infrastructure Report** prepared by Barrett Mahony Consulting Engineers has been amended to include a further developed **SuDs Management Train Flow Chart (Appendix IIIa)** addressing both temporary and permanent arrangements. The amended Flow Chart was submitted to Mr. Gabriel Koncal of DCC Drainage Department on 28th February 2020. At the time of this submission, no further comment has been received from DCC.

For full details of the extent of public surface water sewers to be abandoned and grubbed up as part of this development and as part of the Masterplan drainage strategy, including the proposed phasing of the works, please refer to the following drawings;

- **Drawing No. C1021 – Proposed Foul and Surface Water Drainage Sheet 1**
- **Drawing No. C1022 – Proposed Foul and Surface Water Drainage Sheet 2**
- **Drawing No. C1023 – Proposed Masterplan Drainage Strategy Plan**
- **Drawing N. C1024 – Proposed Masterplan Drainage Phasing Plan**

Further correspondence in relation to this issue was submitted to Ms. Maria Treacy and Mr Gabriel Koncal of DCC Drainage Department on 26.02.2020. At the time of this submission, no further comment has been received from DCC.

A site-specific **Flood Risk Assessment** has been prepared and is included in **Section 3** of the **Civil Engineering Infrastructure Report**. It concludes that this site is in Flood Zone C (as defined in the OPW publication "*The Planning System and Flood Risk Assessment Guidelines for Planning Authorities*"), is deemed appropriate for the proposed development and shall not affect the flood storage volume or increase flood risk elsewhere.

2.7 Traffic and Transport

Additional details in relation to traffic and transport matters, having regard to the requirements of the Transportation Planning Division (report dated 13/02/2020) as indicated in the Planning Authority's Opinion.

DCC Recommendation 1: Consultation with this division will be required for works proposed to the public carriageway and footpaths, in particular South Circular Road, Rehoboth Place and Rehoboth Avenue in advance of requesting a letter of consent and lodging an application. It should be noted that a letter of consent for the inclusion of public roads and footpath within the application boundary should be requested from DCC Environment and Transportation Department.

Further consultation has been undertaken with the DCC Transport Planning and Roads Departments in which DCC provided more specific comments on the proposed design of public works along the external road network and proposed amendments. To address these comments a number of changes have been made which include the removal of the right turn pocket, relocation of the proposed pedestrian crossing, improved pedestrian footpaths in front of Priestland Cottages and White Heather Industrial Estate (opposite Rehoboth Place entrance), refinement of pedestrian crossings along Rehoboth Place and reduction of the corner radii from South Circular to Rehoboth Place and from Rehoboth Place into the development.. Please refer to the following drawing for details of the revised design;

- **Drawing No. SYS-BG-02 – EXTERNAL IMPROVEMENT WORKS**

DCC Recommendation 2: Any works proposed to the roads and public footpaths should be superimposed on an existing survey drawing to ensure full clarity of the proposed amends. All works are required to be designed in accordance with the Construction Standards for Roads and Street Works in Dublin City Council.

The topographical survey has been included within the Transport Assessment Drawing Pack. All works have been reviewed to ensure compliance with the Construction Standards for Roads and Street Works in Dublin City Council and the Design Manual for Urban Roads and Streets.

DCC Recommendation 3: A drawing highlight proposed areas to be taken in charge shall be submitted with the application and all works should be in accordance with Construction Standards for Roads and Street Works in Dublin City Council. DCC will not take in charge roads or footpaths over basements or with any building overhang. On-street car parking spaces along roads proposed to be taken in charge roads would require to be transferred to a public on-street parking scheme when the scheme is operational. Any proposed loading / drop-off spaces are likely to be marked with double yellow lines. This have implications for proposed on-street provisions off Rehoboth Place which includes for private car parking arrangements and drop-off facilities.

A taking in charge drawing has been issued and agreed with DCC. Please refer to the following drawing for details;

- **Drawing No. 950578 - BG PL1010 Level 00_Taking in Charge-PL10.**

All roads, footpaths and parking spaces over basement and building overhangs will be taking in charge by the Applicant. All parking spaces not over basement will be transferred to a public parking scheme when the scheme is operational, as per the surrounding road network. All drop-off facilities will be appropriately marked for taking in charge by DCC. In addition, it has been agreed with DCC that the 4 spaces over basement not taken in charge by DCC will be used to facilitate public car share parking.

DCC Recommendation 4: A few pedestrian pinch points are noted where the development responds to existing buildings constraints, sub-standards footpath provisions should be clearly identified and reviewed.

A review of potential pinch points has been undertaken and footpaths widened where deemed necessary. This includes a widening of footpath and public realm around No. 40 Rehoboth Place and along the site exit. All pinch points are wider than the DMURS minimum of 1.8m, with the majority of footpaths between 2m to 4m. A review of potential pinch points has been included within **Section 5.7** of the **Traffic and Transport Assessment Report**.

DCC Recommendation 5: Outline refuse collection and service arrangements to be clarified for the four blocks, in particular potential impact upon the public realm.

Details of the bin collection proposal and the maximum number of bins that will be on-street at each collection point has been provided within **Section 5.9** of the **Traffic and Transport Assessment Report** and discussed with DCC in the further consultation. It has been demonstrated that no footpaths will be blocked by the bins with 2m minimum walkways maintained when the bins are on-street. The bins will also remain on-street for a short period of time being brought on-street by the management company one hour prior to collection and removed within 30min after collection.

Please refer to the following drawing for details of the location and impact on public realm of the bin collection points;

- **Drawing No. SYS-BG-06 – VEHICLE TRACKING REFUSE VEHICLE**

DCC Recommendation 6: A number of the access routes to bike stores appear unnecessarily convoluted and should be reviewed to enhance the provision of direct access relevant to the internal road network and the block the bike store serves. The provision of sheltered and secure cycle parking for commercial uses is not clear.

The access to the bike stores for each block has been reviewed. Amendments have been made to the access to the bike stores at basement level. This includes improvements to the access stairway for the bikes to remove turns and more direct pathways from the bike room to the cycle lift and the core of BG2. Please refer to the following drawing for details of the revised basement design;

- **Drawing No. 950578-BG PL1009 Level B-1-PL1009**

DCC Recommendation 7: Electrical charging points or future proofing to serve on-street parking should be considered.

The necessary infrastructure will be provided by the Applicant to future proof for the future installation of one electric charging point on-street.

DCC Recommendation 8: The assessment of traffic impacts during the demolition and construction phases, should be included in the assessment having regard to both HGV and other related construction traffic. The assessment should consider the most onerous phase, but also the extent of the impact having regard to the full construction phase. Construction vehicular access points and traffic routes should be reviewed and potential impacts assessed. A cumulative assessment considering the masterplan area and any other nearby committed construction sites should be carried out if relevant. In particular, any proposed joint construction access arrangements will require consideration. Necessary mitigation measures to alleviate identified impacts and other traffic management mitigation measures should be identified and form the basis for a CTMP framework.

A detailed **Construction Traffic Management Plan** has been submitted with this application. This report clearly addresses the expected traffic generation impacts during each construction phase including the most onerous phase during basement excavation, including for both light and heavy vehicles. Details of the

proposed routing of heavy vehicles to and from the site have been included as well as details of on-site parking arrangements for light vehicles and bicycles. The report also considers the combined cumulative impact of the construction of adjacent sites. Access arrangements for phase of construction are clearly identified within the report. Details of necessary mitigation measures are provided.

2.8 Waste Management

Waste Management Details

A **Construction and Demolition Waste Management Plan** prepared by Barrett Mahony Consulting Engineers accompanies this application under separate cover. Separately an **Operational Waste Management Plan** prepared by Byrne Environmental Consulting Ltd. is included with the application. In summary, waste storage rooms are located close to the main access cores at level 00.

Regarding waste collection, the waste bins will be collected 3 times during the week with grey, green and brown bins collected on different days. The bins will be brought onto the street by the management company 1 hour before collection and removed within 30mins after collection. When on-street the bins will not block any footpaths, with a 2m footpath width maintained at collection locations.

Please refer to **Section 5.9** of the **Traffic and Transport Assessment** prepared by Systra which indicates the location of waste collection points, with details of refuse vehicle tracking demonstrating the proposed on-street locations and the maintained width shown in the following drawing submitted by Systra;

- **Drawing No. SYS-BG-06 – VEHICLE TRACKING REFUSE VEHICLE**

2.9 Life Cycle Report

A life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018). This report should specifically address proposed material, finished and detailing which seek to create a distinctive character for the development, avoiding blank facades, dead frontage and render and which provides for active frontages and corners. The documents should also have regard to the long term management and maintenance of the proposed development.

A **Building Lifecycle Report** prepared by Aramark is included with this application under separate cover and addresses all matters set out above.

The **Building Lifecycle Report** has been developed on foot of the 2018 revised Sustainable Urban Housing: Design Standards for New Apartments (Guidelines for Planning Authorities) under Section 28 of the Planning and Development Act 2000 (as amended). These 2018 Guidelines supersede the previous 2015 document.

Within the new Guidelines, new guidance is being provided on build-to-rent. Section 6.13 of the Apartment Guidelines 2018 requires that apartment applications shall:

"include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of the residents."

The **Building Lifecyle Report** issued comprises the **Estate Management Report** and **Building Lifecycle Report**. These reports have been provided to demonstrate how the requirements of Section 6.13 have been met, insofar as design detail has been finalised at this stage.

The reports explain the rationale for material and finishes layout along with common area layouts and estate management strategies; thereby reducing where possible costs for the benefit of the end user.

3 Notification of Statutory Bodies

We can confirm that a copy of this application including all supporting drawings and reports both in printed and electronic form have been issued to;

1) Irish Water
2) National Transport Authority
3) Transport Infrastructure Ireland