Statement of Response to LRD Opinion

Ref. PAC/LRD2/005/24

Lands at

Blackglen Road,
Sandyford,
Dublin 18.

On behalf of

Zolbury Ltd.

January 2025

Brock McClure
PLANNING & DEVELOPMENT CONSULTANTS

Planning & Development Consultants
63 York Road,
Dun Laoghaire
Co. Dublin
www.brockmcclure.ie

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1 INTRODUCTION

We, Brock McClure Planning and Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have been instructed by our client, **Zolbury Ltd.,** to prepare this Response to Dún Laoghaire-Rathdown County Council's LRD Opinion issued on the 23rd of August 2024 to support the application for a Large-Scale Residential Development (LRD) on lands at **Blackglen Road, Sandyford, Dublin 18**.

This report is a response to the issues and queries raised in the LRD Opinion issued by Dún Laoghaire-Rathdown County Council on 23rd August 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 Dún Laoghaire-Rathdown County Council (DLRCC) on 25th July 2024, and was attended by representatives of the Applicant, the Design Team and representatives of the Planning Authority from *inter alia* Planning, 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 Report prepared by the Planning Authority, issued electronically on 23rd August 2024 stated that the documentation submitted at pre-application consultation does **'not constitute a reasonable basis on which to make an application for permission for the proposed LRD'.**

Under the provisions of Section 32D of the Act, The Planning Authority have identifies 11 no. areas that require 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.

The LRD Opinion also requires the provision of specific information accompany the Planning Application, as provided for under Section 16A(7) of the Planning and Development Regulations, 2000 (as amended). These 28 No. items have been addressed, and the relevant documents and drawings are cross referenced in Section 3 of this Report.

As noted the LRD opinion report is dated 23rd August 2024, and accordingly the final date to submit a LRD planning application is 23rd February 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 that 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 – Open space and landscaping

'A quantitative and qualitative assessment that provides a breakdown of the public, private and communal open space provision proposed, in accordance with the relevant standards for same as set out by the Dun Laoghaire Rathdown County Development Plan 2022-2028, must be provided. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc..'

Applicant Response:

In response to this Item, please refer to the opinion response report prepared by Gannon and Associates Landscape Architects which is submitted as part of this application. A full quantitative and qualitative assessment has been provided in accordance with the provisions as set out in the Dun Laoghaire Rathdown County Development Plan 2022-2028 (DLRCC Development Pan). In summary, the current development plan requires 15% of the site area to be dedicated for public open space. We are proposing a total of 22.27% which includes natural play areas, fitness areas, and the dog park. Circulation spaces such as footpaths between buildings, and water attenuation have not been included in the overall calculations as requested.

The DLRCC Development Plan requires an area of 1,320sqm of communal open spaces for the development. We are proposing 2,168sqm which represents an over provision of 160% communal open space. This exceeds the required standards outlined in the DLRCC Development Plan and as required in the Sustainable Urban Housing, Design Standards for New Apartments.

	Public Open Space including:	**Area, Sq.m**	**%, of the site**
	Play provision of them		
	- Natural Area for Play	412.79	
	- Fitness Area	54.84	
	- Dog Park	126.98	
	TOTAL	**8,686.56**	**22.27**
	Communal/Semi-private Open Space including:		
	- Podiums	1201.23	
	- Courtyards	966.86	
	Play provision of them		
	- Local Area for Play (LAP)	169.03	
	- Accessible Roof Gardens	424	
	TOTAL	**2,168.09**	**5.44**
	Widlife Corridor	**4,665.70**	**11.91**

Figure 1 - Open Space Provision as per drawing 23170 Blackglen PA_I _POS

In addition to the above, all apartments, duplexes and houses have access to private open space in the form of balconies, terraces, and gardens in compliance with the standards set out in the 2023 Apartment Guidelines and the Development Plan 2022-2028.

The proposed open spaces have been designed to provide a range of recreational opportunities and meet the functional needs of residents. Public and communal spaces are strategically located to encourage social interaction, active recreation, and safe play areas. The detailed design ensures that these spaces are accessible, secure, and contribute positively to the overall functionality of the

development. For additional details, please refer to drawing 23170_Blackglen_PA_I_POS prepared by Gannons and Associates submitted as part of this application.

In addition, open space within this development are of exceptional quality, with accessible and functional open spaces scattered throughout the scheme. The landscaped elements are divided between several areas throughout the site which gives residents a variety of open space areas to avail of.

2.2 Item 2 – Frontage:

'The presentation of the scheme to Blackglen Road (and Woodside Road to a lesser extent if applicable) shall be justified with regard to the relationship between existing and recent previous character of Blackglen Road (and Woodside road) overall and ensuring active and welcoming frontage is provided by Blocks A1 and A2 to Blackglen Road. The Planning Authority has some concerns regarding a somewhat monotonous architectural presentation to Blackglen Road as currently proposed, and other than some trees, also with regard to the low-level height planting indicated and position facing onto a relatively wide roadway and the previous area character and noting item 5 matters below, and materials and finishes section item further below'.

Applicant Response:

Frontages -

The proposed development at Blackglen Road features two distinct road frontages, with the most prominent being along Blackglen Road itself. The Block A1 and A2 buildings fronting this road are thoughtfully designed to align with the front edge of the neighbouring cottages to the east, extending the existing street edge.

These blocks are strategically positioned to frame the main entrance to the development, pushed apart in the middle to create a forecourt that is enclosed by the North elevation of Block B1 building, enhancing the sense of arrival. The second frontage, facing Woodside Road, has been carefully designed to preserve the existing hedgerow boundary. This natural feature acts as a green veil, providing privacy to the two-story houses situated to the south of the development while also maintaining the road's rural character and charm.

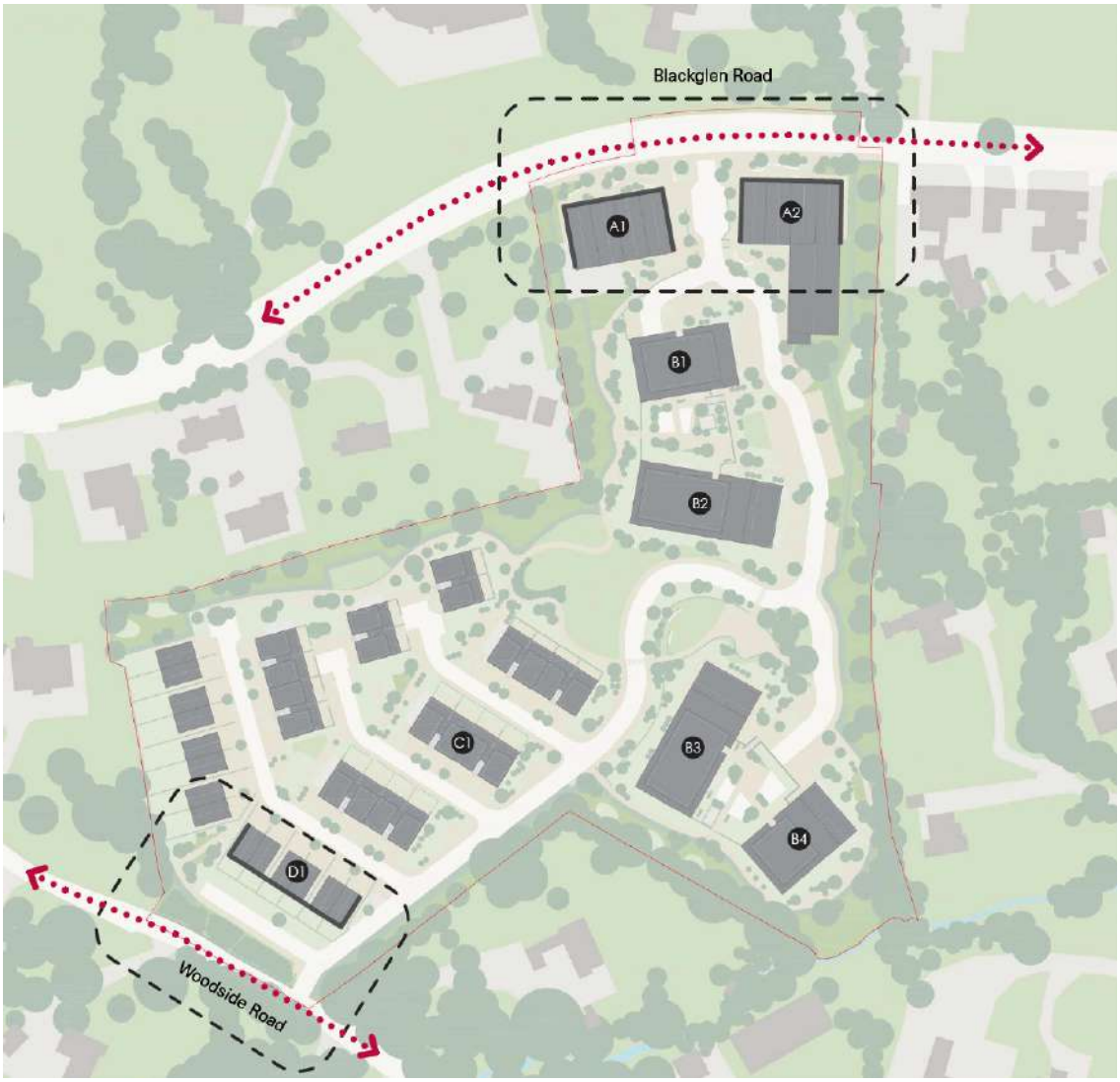


Figure 2 - Response to Opinion – Item 2 (extract from OMP Opinion Response)

Immediate Site Context -

The following sets out the surrounding context that these two frontages have to respond to:

The local area is characterised by an eclectic mix of detached buildings, varying in age, style, type and massing, with some terraced houses to the East along Blackglen Road towards Lamb's Cross. The areas immediately surrounding the site are zoned as rural areas, with some commercial to the North and Neighbourhood centre of Lambs Cross retail to the East.

The site is located at the junction between the more rural Lamb's Cross, and Ticknock and the more urban built-up areas of Belarmine, Simons Ridge and the emerging developments along Sandyford Road, which creates a need for a design that mediates between these distinct conditions.

Blackglen Road Interface -

In response to the planners concerns that the proposed architectural frontages of block A1+2 were monotonous, and that there was a lack of green planting to create a buffer between the ground floor uses and Blackglen Road, several changes have been implemented that address these concerns which have been highlighted within Figure 3-5.

Blackglen Road - Block A2 LRD Opinion View



Protruding balconies onto this main entrance court do not offer much privacy to the residents

The pitched gable does not related to the facade below

The lack of variation in the facade is in part due to the repetitive windows on these visible facades

Blackglen Road - Block A2 Updated View



Recessed corner balconies create enclosure for the residents, offering a suitable level of privacy for their private amenity

Variation to the pitched roof heights amplifies the vertical breaks to the facade

Vertical recess to separate facade into 4 elements

Corner window to active entrance

Granite stone facade to the base of the A1+2 buildings connects these buildings to the surrounding context

Figure 3 – Response to Opinion – Item 2 (extract from OMP Opinion Response)



Figure 4 – Response to Opinion – Item 2 (extract from OMP Opinion Response)

Woodside Road Interface -

In response to the planners request, to justify the relationship between the proposed architecture and the existing character of Woodside road, the landscape strategy on Woodside road is to retain and intensify this existing hedgerow with additional native woodland ground flora: bilberry, ling heather, woodrush, hard fern, broadbuckler-fern and honeysuckle.

This strategy will allow the edge of the development to be largely concealed from the woodside road, and where the rear elevations of the Block D two storey houses peak out from behind the tree line, their pitched roofs and render facades echo the local vernacular typologies.

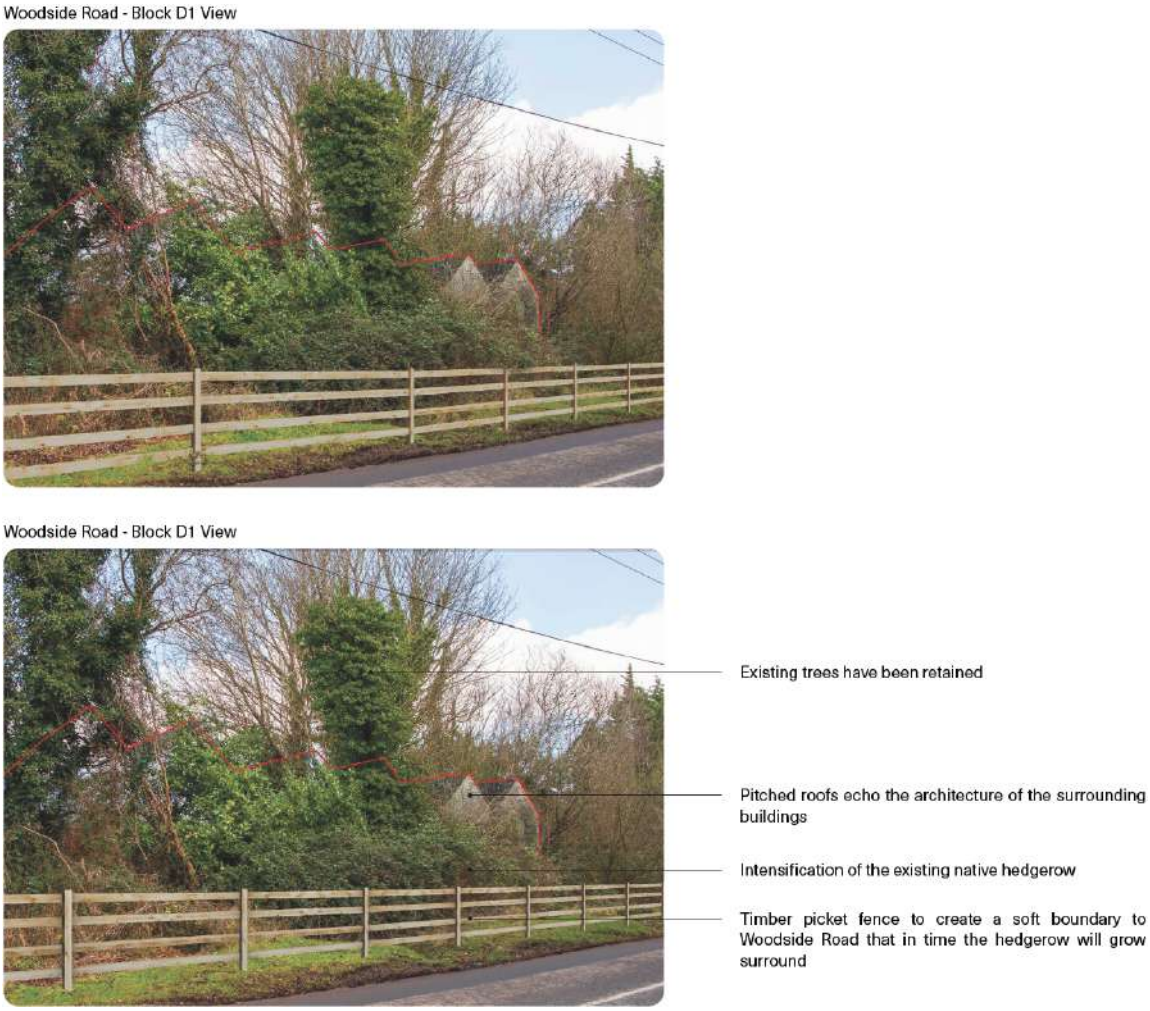


Figure 5 – Response to Opinion – Item 2 (extract from OMP Opinion Response)

Please refer to the opinion response report prepared by OMP submitted with this application, which compares the updated scheme now been submitted at application stage to the previous scheme at Stage 2 S32B opinion stage.

2.3 Item 3 – Density, & Compact Settlement Guidelines:

'While the proposed c. 52 uph density is considered acceptable in principle, justification should be provided by the Applicant, having regard to the location of the site, the site's planning history, and the provisions of the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas', 2009; the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities', 2023, the 2024 Compact Settlement Guidelines, and the Dun Laoghaire- Rathdown County Development Plan 2022-2028, in particular Policy Objectives PHP18 and PHP20. Where deviation from County Development Plan standards are sought in relation to car parking or other provisions, compliance with the provisions of 'the Guidelines' should be thoroughly set out.

The site location is considered to fall under the Suburban / Urban Extension range (40-80 uph). Noting the submitted details and rationale, including figures given, and notwithstanding reductions in densities and unit numbers from previous proposed development applications, and considerations and constraints on-site including sloping topography, and overall upper lands and peripheral location, and biodiversity and landscape matters, and overall area character of receiving context, and the various building heights, unit and relatively wide housing typology mix, and the layout proposed – the proposed density is considered acceptable'.

Applicant Response:

The proposed development has been designed in line with the requirements as set out in the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (SRDCS) 2024.

Section 3.3.1 of the *Guidelines* reviews what are termed 'settlements, area types and density ranges' for various site locations. In terms of categorisation, Table 3.1 of the *Guidelines* outlines density ranges for Dublin. The ranges are broken down into 'City -Centre'; 'City - Urban Neighbourhoods'; 'City - Suburban/Urban Extension'; 'Metropolitan Town'; and 'Metropolitan Village'.

Table 3.1 - Areas and Density Ranges of the guidelines suggests that the proposed development sits within a settlement size classification of 'City -suburban/ urban extension' which is defined in the guidelines as follows:

> *"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)."*

Residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations like the subject site. The proposal on this site has to cope with a challenging site layout; and the requirement to protect adjacent levels of residential amenity as well as its location in a transitional area. Therefore, density of 59.22 units per hectare is justified for the subject site. The density is based on 192 units over the 3.83ha site. The density proposed is considered acceptable given the mandate in national planning policy and the connectivity to public transport within walking distance to the site.

In addition, Section 12.3.3.2 of the Development Plan sets out the requirements for Residential Density. Policy PHP18 of the Development Plan generally promotes higher residential densities subject to the reasonable protection of residential amenity and the established character of the area.

The overall development provides for a residential density of 59.22 units per ha (reduced from 97.3 units per hectare in the previous SHD) based on the substantive development area of 3.83ha, and a proposal for 192 units on a central site.

This residential density is considered appropriate to the site given that the scheme has been amended twice. The number of units has previously been reduced from 400 to 360 units under SHD Ref. 314459-22 and reduced again under the current proposal from 360 units to 192 units.

It's noted that the site falls under 'Peripheral', considering there are no existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services within 500-1,000 metre (i.e. 10-12 minute walk). There is also no reasonable frequent (minimum 15 minute peak hour frequency) urban bus services within 500 metres (i.e. 6 minute walk) of the site.

Peripheral - Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

As previously stated, the local bus services 44B & 114 operate during peak hours and every 30 minutes respectively and provide connections to nearby urban centres. Neither bus route currently provides connections to the city centre. It is noted that the BusConnects plan for the area includes the introduction of bus services 86, 87, 88 and L33. Although these services will provide connections to the city centre, they are not expected to be "high frequency". The Blackglen site is also within 1900m (27 min walk) of the Glencairn Luas stop, which is in excess of 900 metres required for the site to be considered an 'intermediate location'.

The current proposal delivers a gross residential density of 59.22 units per ha (based on a full development site area and development proposal of 192 units), which aligns with requirements.

2.4 Item 4 – Height & massing:

'The Planning Authority notes that the maximum height of the proposed scheme is 5 storeys Justification shall be provided in relation to the height and massing of the proposed development having regard to the Dun Laoghaire-Rathdown County Development Plan 2022-2028, in particular to the Policy Objective PHP42 and the Building Height Strategy for the County as set out in Appendix 5 of the Development Plan. Elevational drawings, enhanced photomontages, and a Visual Impact Assessment including verified views and 3D CGIs (including up to any long-distance views and preferably including winter views) of the proposed development shall be submitted in the final application to assist the assessment of the height and massing of the proposed development [and noting item 3 matters above, and materials and finishes section item below'.

Applicant Response:

Policy Objective PHP42: Building Design & Height from Dun Laoghaire-Rathdown County Development Plan 2022-2028 requires new developments to comply with the Building Height Strategy for the County set out in Appendix 5. Specific to this proposed development, *Policy Objective BHS 3 – Building Height in Residual Suburban Areas* which aims to promote general building height of 3 to 4 storeys. The proposed development at Blackglen road sits comfortably within DLRCC's height and density limits with proposed heights varying from 2-4 storeys and have been reduced from a maximum of 6 storeys previously proposed under ABP Ref. 314459-22. The only exception is the 5 storey upper level setback of block B1.

We are of the opinion that this form of development is appropriate to the site and surrounding context and will not have an overbearing impact on the sensitive character of the receiving environment within the Barnacullia Landscape Area. These reductions in height also reflect the transitional zoning of the site and prioritize the character of the Dublin Mountains by successfully integrating into the emerging streetscape, having regard to topography, cultural context and setting of key landmarks.

The scheme also responds to its context through sensitively positioning the buildings into the natural contours by providing deep setbacks for the apartments, which respond to the sites sloping landscape. The undulating topography of the site also allows for gradual increases in height to transition to increased development height between 2 to 4 storeys with a stepped approach providing a maximum of 5 storeys to create a variety and visual interest and to comply with the cumulative height's strategy. The proposed height, scale and massing is considered appropriate to the characteristics of the existing topography and surroundings on this greenfield site.

Please refer to the attached opinion response report by OMP Architects which sets out a response in relation to the height and massing of the proposal and sets out compliance with criteria as set out in Tables 5.1. In addition, please also find attached LVIA and updated photomontages and verified view prepared by Modelworks to assist in the final assessment and justification of the height and massing of the proposed development.

2.5 Item 5 – Road Infrastructure in the vicinity of the site:

'Insufficient information has been provided to demonstrate how the development would integrate with the recent road and public realm infrastructure upgrades within the vicinity of the subject site at Blackglen Road.

Applicant Response:

Following consultation with Dun Laoghaire Rathdown County Council, construction drawings for the Blackglen Road Improvement Scheme were obtained by O'Connor Sutton Cronin (OCSC) Consulting Engineers. These drawings allowed OCSC to update their final drawings to improve the access arrangement to the development which ensures that all proposed active travel infrastructure both walking and cycling now ties in with the recently constructed infrastructure. Please see attached drawings number Z040-OCSC-XX-XX-DR-C-0110 for detailed information.

2.6 Item 6– Environmental Enforcement:

"The following information should be clarified in the final Application documentation:

Noise Planning

a) It is noted that excavation for basements is proposed as part of these works. In the absence of a site investigation, it is not possible to assess this part of the proposed works. It is also noted that the works are in close proximity to existing residential dwellings. The matter of rock breaking and its prospective impacts by way of noise and vibration should also be thoroughly dealt with in the final Application documentation.

Applicant Response:

Please see attached site investigation report submitted with the application. We can also confirm that additional information has also been included in the attached Construction & Environmental Management Plan (Z040-XX-XX-RP-C-0107) which includes details on rock breaking, as well as additional noise- and vibration-related mitigation measures specified by the noise specialist (Enfonic). The site investigation report has also been appended to the CEMP included in application for more clarity.

b) Preparation of a report detailing selection of construction methodology, implementation of mitigation measures to minimise nuisance affecting adjoining properties and design of building services in the completed development, such as ventilation fans and ducting and proposed heating system, to avoid creation of nuisance affecting adjoining properties.

Applicant Response:

The Construction & Environmental Management Plan (Z040-XX-XX-RP-C-0107) has been updated with more detailed information on the proposed construction methodology for basements, as well as additional noise- and vibration-related mitigation measures specified by the noise specialist (Enfonic).

To note Heating and ventilation is provided by a combination of Mechanical Ventilation Heat Recovery (MVHR) and Exhaust Air Heat Pumps (EAHP) units. These units are located internally to the dwellings and therefore there is no associated external noise impact.

c) Preparation of a report assessing the existing noise environment utilizing the methodology set out in ProPG, Professional Guidance on Planning & Noise, published in May 2017 by the Institute of Acoustics.

Applicant Response:

Please find attached Noise Impact Assessment by Enfonic, Noise Consultants which assesses the existing noise environment utilising the methodology as set out in the ProPG: Professional Guidance on Planning & Noise, published in May 2017 by the Institute of Acoustics.

Construction and Demolition Waste Management Plan

d) The basic information required at planning application stage is as follows:
Materials Source and Management Planning identifying type of materials/proportion of re-use/recycled materials and future maintenance to support the implementation of Government and EU circular economy policy, taking account of BEST PRACTICE GUIDELINES for the preparation of resource & waste management plans for construction& demolition projects (EPA 2021)

Applicant Response

A full Resource & Waste Management Plan has been prepared and is submitted as part of the application (Z040-OCSC-XX-XX-RP-C-0108). This report has been updated to include a table under section 5.3 showing the type of materials and the estimated proportion of re-use/recycle materials expected at the site based on cut/fill calculations. Additional information has also been added to note it is a 'live' document. These changes were confirmed with the relevant department in DLRCC

e) Procedures to enable tracking of all waste generated to final destination.

Applicant Response

Please find details to include tracking of all generated waste under Chapters 5 and 6 in the attached Resource & Waste Management Plan (Z040-OCSC-XX-XX-RP-C-0108) prepared by OCSC and submitted as part of the planning application.

Construction Management Plan (CMP)

f) Previous experience indicated that projects such as the one proposed here give rise to major environmental issues, which can be very difficult to address if they are not handled properly at planning application stage. The following minimum information should be included in any such planning application.

- ***i. Environmental Management and Monitoring Proposals***
- ***ii. Site Hoarding Proposals***
- ***iii. Complaints management Proposals***

Applicant Response:

Please find attached opinion response from OCSC which sets out a response to the above queries. The requested information is available in the attached Construction & Environmental Management Plan (Z040-OCSC-XX-XX-RP-C-0107-S4-P03):

I. Environmental Management and Monitoring Proposals – Please see Chapter 7 of the submitted CEMP
II. Site Hoarding Proposals – Please see Chapter 4 of the submitted CEMP.
III. Complaints Management Proposals – Please see updated Chapter 9 of the CEMP.

Operational Waste Management (OWMP)

g) Development of an Operational Waste Management Plan setting out proposals for segregation and management of waste within the completed development to support EU and National Policy.

Applicant Response:

Please find the enclosed Operational Waste Management Plan, prepared by Enviroguide Consulting, which sets out proposals for segregation and management of waste within the completed development to support EU and National Policy.

2.7 Item 7 – Transportation Planning:

a) "The Applicant is requested to consider the provision of a controlled pedestrian and cycle crossing facility on Blackglen Road, particularly for the use of eastbound bus services along Blackglen Road by residents of the proposed development.

Applicant Response:

A toucan crossing is proposed just east of the access to satisfy this request. This crossing ties in with the existing infrastructure constructed as part of the Blackglen Road Improvement Scheme. The road drawings have been updated to reflect this change. Please see drawing Z040-OCSC-XX-XX-DR-C-0110 for more information. The operationality and traffic impact of the proposed controlled crossing has also been assessed as part of the updated Traffic & Transportation Assessment (Z040-OCSC-XX-XX-RP-C-0104).

b) Transportation Planning note that the proposed development does not make any provision for possible future accesses and/or permeability links to adjacent Lands. The Applicant is requested to give further consideration to the provision of these possible future accesses and/or permeability links to adjacent Lands [regard should also be had to any related issues in any link to the Biodiversity, Parks & Landscaping, and Public Lighting and so on items listed below, and in the attached DLRCC internal Department reports, including with regard to lighting, site layout and services, etc.].

Applicant Response:

Please see attached site layout plan prepared by OMP Architects which shows an indicative proposed location for a possible future connection to the adjacent lands. The proposal now provides two future links, the first link to the South allows for connection to Woodside road if this is ever upgraded. The second connection to the East allows for permeability between the proposed development and any possible future developments.

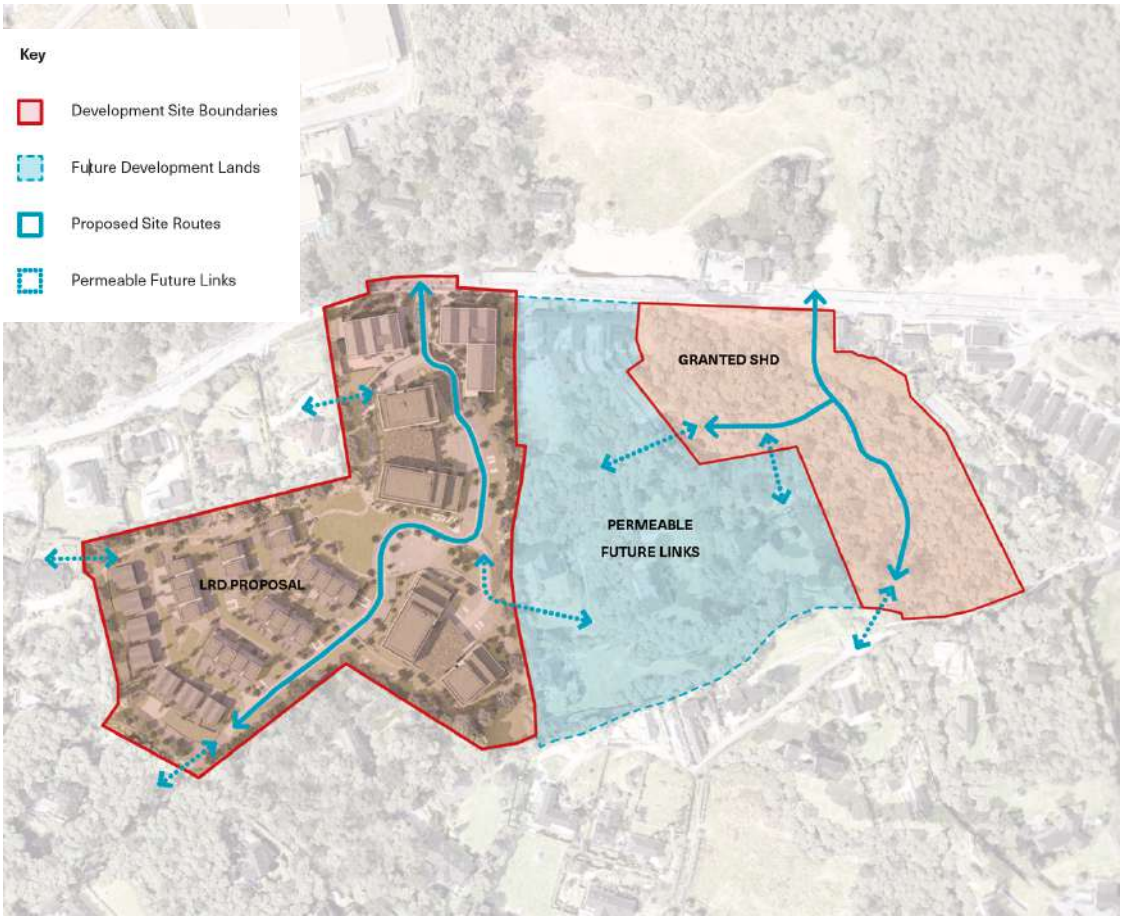


Figure 6 - Possible future connections to adjacent lands

c) ***The recent Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities Section 5.3.4 Car Parking – Quantum, Form and Location states that 'Car parking ratios should be reduced at all urban locations, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport.' Hence, the Applicant is requested to consider reducing the car parking provision.***

Applicant Response:

The quantum of car parking proposed has been amended from the S32B meeting as requested. Visitor parking spaces for apartments now align with the current Dun Laoghaire Rathdown County Development Plan. We are now proposing a change from 1 space per 4 apartments to 1 space per 10 apartments. This results in a decrease of the proposed spaces from 261 to 234, for an overall decrease of 27 no. spaces.

In addition to this, the car parking for the housing component has also been reduced by 8 no. spaces, for a ratio of 1.6 spaces per unit rather than 2.0. Which means the overall car parking provision has been reduced from 261 to 226. The Parking Strategy as set out in chapter 6 of the attached Traffic and Transport Assessment by OCSC has also been expanded to take cognisance of the Compact Settlement Guidelines. Please see the updated Traffic and Transportation Assessment (Z040-OCSC-XX-XX-RP-C-0104) for more details on this.

d) Transportation Planning are in favour of the provision of car club services/parking spaces as part of proposed developments. Hence, the Applicant is requested to consider the provision of car club services/parking spaces as part of proposed development.

Applicant Response:

It is It is proposed to include 2 no. car club spaces, which have been included in the updated site layout and noted in the updated Traffic and Transportation Assessment (Z040-OCSC-XX-XX-RP-C-0104) and Mobility Management Plan (Z040-OCSC-XX-XX-RP-C-0105).

e) The Applicant is requested to ensure that the proposed LRD complies with the requirement to provide 4% of all car parking spaces as disabled car parking spaces, 20% minimum requirement for the provision of fully functional EV Charging Points and electrical infrastructure/ducting to every parking space to allow their future upgrade to Electric Vehicle Charging Spaces, and the requirement to provide four or more motorcycle parking spaces per 100 car parking spaces, all in accordance with Sections 12.4.5.3, 12.4.11 and 12.4.7 of the current DLR County Development Plan 2022 – 2028.

Applicant Response:

These requirements have been met and is noted in the submitted Traffic and Transportation Assessment (Z040-OCSC-XX-XX-RP-C-0104). Please see Chapter 6 which details the Parking Strategy.

We can confirm the following as requested:

- 12 no. accessible spaces (5% of car parking spaces);
- 9 no. motorcycle spaces (4 spaces per 100 car parking spaces);
- 47 no EV spaces (1 space per 5 car parking spaces); and
- 2 no. car club spaces.

f) The Applicant is requested to submit a detailed Quality Audit which shall include a Road Safety Audit, Access Audit, Cycle Audit and a Walking Audit. The independent Audit Team shall be approved by the Planning Authority (Transportation Planning Section) and all measures recommended by the Auditor shall be undertaken unless the Planning Authority approves any departure in writing. A feedback report should also be submitted providing a response to each of the items.

Applicant Response:

Please find attached detailed Quality Audit has been carried out by Bruton Consulting and has been included in the submitted application. All measures recommended by the Auditor have been incorporated into the final development proposal.

g) The Applicant is requested to submit a detailed Cycle Audit as required in accordance with Section 12.4.6.1 Requirements for New Development of the current DLR County Development Plan 2022 – 2028. All long stay (resident) cycle parking spaces are required to be convenient/readily accessible, secure, covered cycle parking spaces, and should not all be double rack spaces, but rather a variety of bike stand types including 'Sheffield' stands to provide for cyclists of all ages and abilities, and also accommodate non-standard bikes such as cargo bikes, bike trailers and e-bikes. All short stay (visitor) cycle parking spaces are required to be convenient/readily accessible cycle parking spaces and be 'Sheffield' type stands. Approx 50% of visitor spaces should be covered.

Applicant Response:

A detailed Quality Audit (which includes a Cycle Audit) has been carried out by Bruton Consulting and has been included in the submitted application. All measures recommended by the Auditor have been incorporated into the development plans.

2.8 Item 8 – Parks & Landscaping

a) "The Applicant is invited to also consider an alternative potential layout, with the omission of the public footpath to the western boundary. In the event the Applicant decides to retain the currently proposed layout, a written justification should be provided with regard to the retention of that layout.

Applicant Response:
The current layout of the road is based on the principles of DMURS Section 4.4.6 which specifies changes in horizontal alignment in order to improve traffic calming. This is especially applicable due to the steep gradients required at this site. Straightening the road will lead to increased speeds and additional challenges with levels and gradients. The playground has been relocated to ensure the road does not lead to potential safety issues. This has been noted in the updated DMURS Statement (Z040-OCSC-XX-XX-RP-C-0106) and is also further described in the response by the Landscape Architect.

A redesign of the central public open space was undertaken. In the updated layout now submitted, the footpath has been relocated away from the road to create a safer and more secure natural play area next to the western boundary. The area originally intended for the play area, located below the road, has now been transformed into an open space featuring an amphitheatre, plaza, tennis area, and a smaller natural play area. Drawing 23170_Blackglen_PA_I_LM by Gannon's and Associates refers.



Figure 7 - Snip of central open space from drawing 23170_Blackglen_PA_I_LM

b) The Applicant is invited to also consider an alternative potential layout, with the rerouting of the road layout in the central part of the proposed development site. In the event the Applicant decides to retain the currently proposed layout, a written justification should be provided with regard to the retention of that layout'.

Applicant Response:
A series of workshops have taken place between the full Desing Team to explore the alternative potential layout or re re-routing the road in the central part of the proposed development site . Due to changes in site levels, it was not feasible to amend the current road layout.

2.9 Item 9 – Drainage

Surface Water Drainage

a) The applicant has indicated a green roof provision of 60%. This is not in line with the current Green Roof Policy. In accordance with Appendix 7.2: Green Roof Policy of the County Development Plan 2022-2028, the applicant should demonstrate which areas of the development will have green roofs, and should demonstrate by calculation, and by

representation on a drawing, that the proposed green roof extents are in accordance with the Council's Green Roof Policy such that the minimum coverage requirement is achieved. The applicant should also provide details of maintenance access to the green roofs and should note that, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed. A detailed cross section of the proposed build-up of the green roof should be provided, including dimensions. The applicant should demonstrate that the green roof is designed in accordance with BS EN 12056-3:2000, BS 6229:2018 and The SUDS Manual (CIRIA C753). Any runoff coefficients applied to the green roof areas should be in accordance with the tabulated runoff factors detailed in Section 3 of Appendix 7.2: Green Roof Policy.

Applicant Response:

It was noted in the opinion document that earlier green roof provision was indicated at 60%. Green roof area requirements (as per Dun Laoghaire-Rathdown County Development Plan 2022-2028, Appendix 7.2) call for 70% coverage where the green roof build up is extensive (min 80mm soil build up), and 50% coverage where an intensive build up will be used (min 200mm soil build up).

The proposed buildings to which the DLR CDP regulations apply are listed in the table below, along with their total roof area, green roof requirements, the proposed area of green roof coverage, and whether it is proposed to use an intensive or extensive build up. All buildings now meet and exceed the minimum requirements for area of coverage.

Table 1 - Proposed Green Roof Coverage

Buildings with Greater than 300m^2	Total Area	Green Roof Requirement (Extensive 70%)	Green Roof Requirement (Intensive 50%)	Green Roof Area Provided
A1	586	410	293	Over 1280m^2 provided by placing extensive green roofs on 20 of the individual units (approximating to almost 80%)
A2	1022	715	511	
B1/B2	2035	1425	1018	1060 (intensive)
B3/B4	2059	1441	1030	1065 (intensive)

Runoff factors used in the modelling of the drainage system were as follows (per DLR CDP requirements – Appendix 7.3, p. 260):

- For extensive green roof areas, a factor of **0.917** was used (on the 20 individual housing unit with green roofs).
- For intensive green roof areas, a factor of **0.834** was used (on Block B1/B2 and Block B3/B4).

In addition In addition to the landscaping, the proposed development contains area of green roofs suitably planted. These areas will need to be maintained and it is proposed that maintenance will take place on a quarterly basis. Where internal access to the roof is not possible, a suitable mobile platform will be used for access to the roof, subject to availability of hard standing areas designed for this purpose. The OMC may also be responsible for a fall arrest system on the roof, designed to provide protection while working at height, and certified bi-annually.

b) The applicant is requested to provide provision for urban creep, in the areas that may be subject to urban creep (private housing), in line with the requirements of Appendix 7.1 of the County Development Plan.

Applicant Response:

As required in the DLR CDP (Appendix 7.2, p. 241), *"All developments must apply a factor of 1.1 to their drainage design and attenuation volumes to accommodate urban creep."* This factor has been

applied to the design model and may be seen in the Design Calculations Report read-outs in Appendix D of the Engineering Services Report (see sample below).

Table 2 - Sample from analysis results in Design Calculations Report, showing Urban Creep factor of 10%

CAUSEWAY	O'Connor Sutton & Cronin 9 Prussia Street Dublin 7 D07 KT57	File: SW and WW Networks.pfc Network: Storm-Main Kyle Gray 19/11/2024	Page 18 Blackglen Road LRD Z040

Results for 30 year +20% CC +10% A Critical Storm Duration. Lowest mass balance: 98.34%

Node Event	US Node	Peak (mins)	Level (m)	Depth (m)	Inflow (l/s)	Node Vol (m³)	Flood (m³)	Status
30 minute summer	20	22	146.305	0.334	8.8	0.3783	0.0000	SURCHARGED
30 minute summer	21	23	146.299	1.659	19.2	4.7141	0.0000	SURCHARGED

c) It is not clear from the report the extent of storage provided on site. The applicant is requested to provide a detailed written breakdown of the storage provision in each of the storage facilities on site (bioretention areas/storage tank etc).

Applicant Response:

Attenuation systems are to be provided at strategic locations within the development in order to temporarily store excessive rainfall runoff, during significant rainfall events, due to the restricted discharge rates (to less than greenfield equivalent runoff rates) from the development outfalls.

This will be provided initially through integration with the landscape proposals around the development, with further provision of pervious paving and grasscrete for car parking areas.

The development is to combine a number of sustainable drainage features along with elements of a traditional drainage system. The development's main attenuation features are as follows (summarised in table beneath):

- Subcatchments 1A, 1B, 1C & 1D, including access road will flow via a filter drain along the road to a two stage underground attenuation setting (1&2) in the centre of the overall property, first to the west of the access road, and continuing to the east of the same. This will be in the form of two proprietary, modular systems (such as the geocellular ESS ECOCELL, or similar approved).
- Flow will continue onwards following the general path of the access road, to a third underground attenuation structure (3) to the east of Block B1/B2 (proprietary, modular system, such as the geocellular ESS ECOCELL, or similar approved).
- Subcatchment 1E will be primarily attenuated via blue roof (6) at roof level on Block B1/B2. The blue roof will be subject to specialist design.
- Subcatchment 1F will be attenuated in an underground structure (5) (proprietary, modular system, such as the geocellular ESS ECOCELL, or similar approved).
- Subcatchment 1G will be primarily attenuated in an underground structure (4) (proprietary, modular system, such as the geocellular ESS ECOCELL, or similar approved) to the south of Block A2 just upstream of the final flow control device.
- Catchment 2B will be attenuated at roof level of Block B3/B4 (via blue roof (7) – subject to specialist design)
- Catchment 2A will be attenuated in a stone infiltration soakaway (8) Upstream of the final flow control.

Table 3 – Storage Summary

STORAGE SUMMARY*

Attenuation Structure	Description	Location	Storage Volume Provided (m^3)	Invert Level (m AOD)	Plan Area (m^2)	Depth (m)	Porosity	Min. Cover (m)
1	Underground Attenuation structure (ESS ECO Cell or similar)	South West of Block B2	**359.8**	145.000	249.8	1.5	0.96	0.58
2	Underground Attenuation structure (ESS ECO Cell or similar)	North of Block B3	**441.2**	143.120	306.3	1.5	0.96	0.58
3	Underground Attenuation structure (ESS ECO Cell or similar)	East of Block B1/B2	**170.6**	141.000	118.4	1.5	0.96	1
4	Underground Attenuation structure (ESS ECO Cell or similar)	South of Block A2	**238.7**	138.300	165.7	1.5	0.96	0.7
5	Underground Attenuation structure (ESS ECO Cell or similar approved)	South of Block A1	**126.8**	138.500	88.0	1.5	0.96	1
6	Blue Roof Attenuation on Roof	Block B1/B2	**162.0**	Roof level	**	**	0.40	N/A
7	Blue Roof Attenuation on Roof	Block B3/B4	**164.0**	Roof level	**	**	0.40	N/A
8	Stone Infiltration Soakaway	East of Block B3/B4	**46.5**	139.900	88.6	1.5	0.35	0.5
9	Bio-Retention Area A	Roadside (next to individual units) See Drainage Layout (C-0501/2)	**43.0**	-	122.3	0.5	1.00	-
10	Bio-Retention Area B	Roadside (next to individual units) See Drainage Layout (C-0501/2)	**35.0**	-	104.2	0.5	1.00	-
11	Bio-Retention Area C	Roadside (next to individual units) See Drainage Layout (C-0501/2)	**28.0**	-	90.2	0.5	1.00	-
12	Bio-Retention Area D	Roadside (north of Block B1/2) See Drainage Layout (C-0501/2)	**11.3**	-	39.7	0.5	1.00	-
13	Bio-Retention Area E	East of Block B1/B2 at site perimeter See Drainage Layout (C-0501/2)	**58.0**	-	145.7	0.5	1.00	-
14	Bio-Retention Area F	East of Block B1/B2 at site perimeter See Drainage Layout (C-0501/2)	**24.7**	-	67.8	0.5	1.00	-

Notes:
** Table does not include storage along filter drains or under permeable pavement*
*** Final plan area and depth to be determined by Architects and Green/Blue Roof designer*

In addition to the above, storage in the form of a 900mm wide filter drain has been provided along the side of much of the access road layout. This storage is achieved by the use of appropriately sized orifice plates at regular intervals (none less than 50mm diameter).

Pervious paving to be provided within all car parking spaces within the development (utilising both permeable paving blocks or grasscrete). This will provide at source treatment of runoff from the roads while also providing interim storage within the base course. A minimum of 300mm stone with a minimum porosity of 30% is to be provided below the pervious paving. Runoff temporarily stored within the base course will be allowed to infiltrate naturally to ground water via a 500mm filter drain, which is connected to the main drainage network for cases of overflow from extreme events.

d) The applicant has indicated a number of sub catchments, within catchment area 1.
- ***i. Attenuation system***
- ***ii. Green roofs/podiums (if provided)***
- ***iii. SuDS measures***

Applicant Response*:*

Cross sections of underground attenuation have been provided on drawings C-0521/22. Those of the other SuDS measures are provided on details sheet C-0523/24 submitted by OCSC consulting Engineers.

e) The applicant has indicated a number of sub catchments, within catchment area 1. The applicant is requested to identify on a colour coded drawing the various sub-catchments and the elements of interception, storage, conveyance and flow control for each.

Applicant Response:

Please now find included in this planning pack drawing C-0505 (Storm Water Catchment Zone Plan), prepared by OCSC Consulting Engineers which identifies the various sub-catchments and the elements for interception, storage, conveyance and flow control for each.

f) The applicant is requested to comment on the lack of tree pits or bioretention areas adjacent to the roads within the development.

Applicant Response:

Tree pits, bio-retention areas and rain gardens have been provided and are indicated on the Storm Water Drainage Layouts C-0501 & C-0502 prepared by OCSC Consulting Engineers.

g) As standard, the applicant is requested to show the options being proposed for interception and treatment with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GDSDS requirements. The applicant should note that over-provision in one location does not compensate for under provision elsewhere.

Applicant Response:

Please find Storm Water Audit prepared by JBA Consultants submitted as Appendix L in the Engineering Services Report by OCSC Consulting Engineers. This audit provides storm water interception of runoff calculations.

h) As standard, the applicant is requested to submit long-sections of the surface water drainage system, clearly labelling cover levels, invert levels, pipe gradients and pipe diameters.

Applicant Response:

These have been submitted for each of the Storm Water and Wastewater drainage systems (see drawings C-0510, C-0511, C-0512 for the surface water long sections, and drawings C-0515, C-0516 for the wastewater long sections) submitted as part of the drawing/documents pack submitted by OCSC Consulting Engineers.

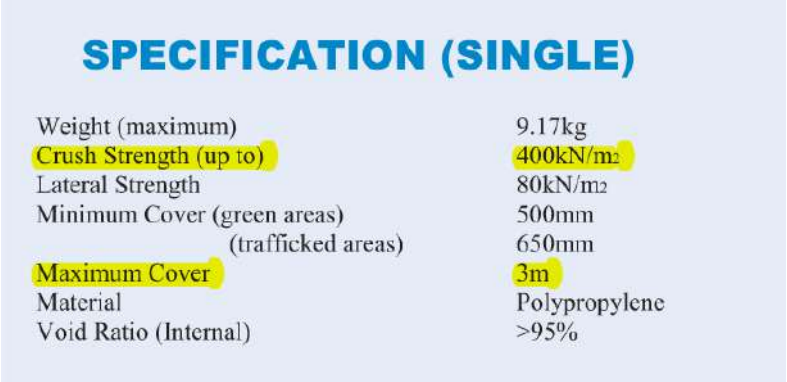
i) As standard, the applicant is requested to provide fully dimensioned plans and sections of the attenuation storage system. All relevant inlet and outlet levels, dimensioned clearances between other utilities, and actual depths of cover to the tank shall be provided. The applicant shall include confirmation from the chosen manufacturer of the storage system that the specific model chosen, with the depth of cover being provided, has the required load bearing capacity to support the loading that may imposed upon it.

Applicant Response:

Plan dimensions have been added to the latest drainage layout drawings (C-0500, C-0501). Sections of the same are provided on drawings C-0521/22 as submitted by OCSC Consulting Engineers.

The table below from the product specification document (attached to Engineering Services Report as Appendix I prepared by OCSC Consulting Engineers) gives the maximum cover allowed as 3m. The maximum cover used in the design drawings is 1.7m in one isolated area. Generally the depth of cover ranges from about 700mm to 1200mm. See drawings C-0521 & C-0522 for cross sections of all attenuation structures with cover dimensions.

Table 4 – Extract from the product specification document (attached to Engineering Services Report as Appendix I prepared by OCSC Consulting Engineers)



SPECIFICATION (SINGLE)

Weight (maximum)	9.17kg
Crush Strength (up to)	400kN/m2
Lateral Strength	80kN/m2
Minimum Cover (green areas)	500mm
(trafficked areas)	650mm
Maximum Cover	3m
Material	Polypropylene
Void Ratio (Internal)	>95%

j) If the applicant proposes SuDS measures that incorporate the use of infiltration, the applicant is requested to provide details of each SuDS measure and confirm whether it will be lined/tanked or not.

i. If lined/tanked systems are to be used, then the applicant will be requested to explain the rationale behind this.

ii. If unlined systems are to be used then the applicant is requested to demonstrate on a drawing that all infiltration SuDS proposals, including the attenuation system, have a 5m separation distance from building foundations and 3m separation from site boundaries.

Applicant Response:

None of the SuDS features proposed will be lined/tanked in order to allow for even minimal infiltration. Infiltration has only been considered in modelling calculations for the stone soakaway in the southeastern portion of the site, and for the infiltration trenches.

There are two instances where underground attenuation structures are less than 5m from buildings. These occur as follows:

- To the south side of Block A1; both at a distance of 2.5m from the building (as shown on drawing C0501).
- To the north of Block B2; at a distance of 3m from the building (as shown on drawing C-0501).
- To the south-west side of Block A2; abutting the building foundation (as shown on drawing C-0501).

However, as the buildings foundations will themselves be founded over the shallow underlying rock, it is judged that they pose no risk to the buildings' stability (noted in section 3.2.4.8 of the Engineering Services Report). In no case is a SuDS feature proposed located within 3m of the site boundary.

k) The applicant has not provided any information in relation to the drainage network for the proposed basement. The applicant is requested to provide a drawing detailing the basement drainage arrangements, noting that all basement drainage should discharge to foul sewer and not the surface water sewer.

Applicant Response:

Please refer to the drainage design drawings submitted as part of OMP Architects Drawing Pack for full details. A primary wastewater network has been provided in proximity to all buildings for the outflow of foul sewers and internal floor drains. Connection locations are indicative only.

l) As standard, the applicant shall ensure that other disciplines' drawings and designs are compatible and co-ordinated with engineering design and drawings.

Applicant Response:

The storm water drainage, wastewater drainage and watermain design have all been co-ordinated and no clash has been detected.

m) As standard, the applicant is requested to ensure that the flow control device provided does not have a bypass door.

Applicant Response:

Descriptions on the final out falling flow controls on the drainage layout have been amended to include a note that the flow control must be without a bypass door. Please refer to drawings and accompanying reports submitted by OCSC Consulting Engineers.

n) As standard, the applicant is required to provide specific flow control device information including the model and make number, orifice size and flow control hydraulic characteristics graph.

Applicant Response:

A table outlining the suggested model, model number, design flow, orifice size, etc. for the primary out falling flow controls has been added to OCSC - Engineering Services Report (Sec. 3.4.2.10). More detailed specifications, design drawings and flow characteristics graphs have been added to appendix K in the same report.

o) As standard, a Stormwater Audit will be required for this application. In accordance with the Stormwater Audit policy, the audit shall be forwarded to DLRCC prior to lodgement of the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.

Applicant Response:

Please find attached Storm Water Audit by JBA Consulting appended to the Engineering Services Report submitted by OCSC Consulting Engineers.

Site Specific Flood Risk Assessment

a) The applicant is requested to comment on the proposed surface water drainage system in the event of blockage or partial blockage of the system, commenting on any surcharging or flood risk that may be identified. The applicant is requested to submit a drawing identifying and showing details of safe overland flow routes both within and without the site. The overland flow route plan should identify drop kerbs or ramps requested for channelling the flow, should address low point areas in the site and should detail how properties, both within the development and on adjacent lands, will be protected in the event of excessive overland flows.

Applicant Response:
Drawing C-0508 (Exceedance Flow Plan) has now been provided as part of the civils drawing package. In addition an explanatory section (4.3.3) has been added to the Site Specific Flood Risk Assessment, and the above drawing added to the same as Appendix G.

b) The applicant is required to show by cross-sections that the topography remains unaltered across the full extent of the flood extents. These cross-sections should also confirm that the required freeboard is provided.

Applicant Response:

A Cross Section has been provided as Appendix F in the Site-Specific Flood Risk Assessment submitted with OCSC Consulting Engineers Reports.

2.10 Item 12 – Biodiversity

a) ***"A revised Ecological Impact Assessment (EcIA) in relation to protected habitats and species is requested to address the following:***

A detailed ecological assessment of the Carrickmines Stream and its riparian edge (and the pools/drainage ditch mentioned in the EcIA) including any important associated features or species both within the site but also within the Zone of Influence.

Applicant Response:

A detailed ecological assessment of the Carrickmines Stream and its riparian edge is provided within the revised EcIA (Section 4.3.6).

A detailed hydrogeological assessment by a suitably qualified hydrogeologist with input from a suitably qualified ecologist, for any potential impacts on the Carrickmines stream, Fitzsimons Woods pNHA, ponds or any associated Groundwater Dependent Terrestrial Ecosystems (GDWTE) that occur within the ZOI. This is requested given the proposed development will include basements and may encounter groundwater.

Applicant Response:

A detailed Hydrological and Hydrogeological Risk Assessment (HHRA) has been prepared for the Proposed Development and accompanies this application under separate cover. The HHRA includes an assessment of any potential impacts on the Carrickmines stream, Fitzsimons Woods pNHA, ponds or any associated Groundwater Dependent Terrestrial Ecosystems (GDWTE) that occur within the ZOI of the Proposed Development, including an assessment of the proposed basement works. The HHRA is referenced where applicable in the revised EcIA report.

If groundwater is encountered this will require specific management also during construction and so it is requested that this addressed in the hydrogeological assessment, EcIA and CEMP.

Applicant Response:

Specific mitigation for groundwater protection has been included within the HHRA and CEMP. The EcIA references the standard suite of mitigation measures included within the CEMP

i. ***It will be important given the presence of pooling water and ditch/stream and also the terrestrial habitats, and also the known occurrence of amphibians at Fitzsimons woods area and surrounds, that surveys for protected species including common newt, other amphibians and common lizard are completed, at the appropriate season by a specialist. The application of the precautionary principle provided in the EcIA is not sufficient to the assessment given particular licences, methodologies, mitigation would be required specific to these protected species and any associated habitats (both during construction and operation).***

Applicant Response:

A rapid herptile assessment was conducted at the Site in July 2024 as a result of feedback received from DLR Biodiversity Officer Anne Murray at the Stage 2 LRD meeting with DLR. The assessment was conducted by herptile expert Rob Gandola and involved a site walkover to assess amphibian and reptile presence/absence and make inferences on usage of the Site where possible.

It was noted that the assessment was constrained by the time of year, being carried out outside of the optimal amphibian survey season, and therefore only provides a presence/absence assessment for amphibians. The Rapid Herptile Assessment Report is provided in Appendix VI of the EcIA submitted with this application.

ii. ***Following on from the surveys it is requested that an assessment is completed of protected amphibian species and also common lizard, if/where applicable.***

Applicant Response:

Based on the results of the rapid herptile assessment and discussions with the herptile expert, the mitigation in the EcIA was revised to provide specific measures for the protection of amphibians at the Site including: a full suite of amphibian surveys to be conducted in Spring 2025 and prior to the commencement of any works on Site, the construction mitigation measures to include an ECoW watching brief and pre-clearance surveys for amphibians, an amphibian safe zone within the proposed wildlife refuge area with one-way amphibian fencing, and protection of the existing pooling in the south-east of the Site by way of the wildlife refuge. Amphibian and herptile habitat enhancement measures include the provision of ponds, bioretention areas and hibernacula within the wildlife refuge, and the management of these new habitats for herptiles as detailed within the Wildlife Refuge and Biodiversity Management Plan submitted with this application.

iii. It is requested that cumulative impacts are considered and how they have been mitigated including visitor pressure to Fitzsimons Woods pNHA.

Applicant Response:

Recreational pressures on Fitzsimons Woods have been assessed in detail within the revised EcIA (Section 5.3.1.1) with reference made to the existing management approach and community involvement of the pNHA and the alternative natural amenities proposed within the Site of the Proposed Development itself (extensive woodland and nature trail).

It is requested that NPWS are consulted, in relation to any licences under the Wildlife Acts, if applicable.

Applicant Response:

The rapid herptile assessment was conducted by a licenced herptile expert Rob Gandola in July 2024. No further licences are required from the NPWS at this time. Should any licenced activities be required during the proposed works if granted, the NPWS will be consulted by the ECoW regarding same.

b) Landscape Plan

It is It is requested that the Landscape Plan is revised to provide the following:

i. More native planting for the boundaries to include native crab apple, elder, etc for agreement with DLR Biodiversity Officer.

Applicant Response:

As requested, the current boundary planting selection includes a variety of native shrubs and trees, providing diverse benefits to local biodiversity. Specifically, the plan proposes native shrubs like hard fern, hawthorn, broom, foxglove, holly, crab apple, myrtle, blackthorn, and elder. These selections support various wildlife species, encourage pollinator presence, and enhance ecological stability.

The inclusion of native tree species such as silver birch, downy birch, holly, sessile oak, and pedunculate oak further demonstrates a commitment to local biodiversity and carbon sequestration. These trees are well- suited to the local climate and soil conditions, and they offer food sources and habitats for numerous native insects and birds, fostering a sustainable ecosystem.

The selection of these species, particularly the addition of native oaks and birch, aligns closely with the Council's biodiversity objectives, as these trees are critical for supporting native wildlife. Oak trees, for instance, support hundreds of insect species and contribute to complex food webs in Irish ecosystems, while birch trees provide early pollen sources for bees and add to the structural diversity needed for various fauna.

ii. Bracken although native can be highly invasive and may impact on the planned landscaping of the proposed site, if it becomes dominant. Therefore, a bracken management plan will be required as part of any landscaping plans or contracts. This is requested at this stage to ensure that it considers biodiversity also.

Applicant Response:

Regarding the request for a bracken management plan, we would like to clarify that bracken (Pteridium aquilinum) was never included in the proposed landscaping plan for the site.

The current plan is designed to prioritize a diverse range of native trees and shrubs that align with Dun Laoghaire County Council's biodiversity goals, including species such as oak, birch, crab apple, elder, hawthorn, and holly. These species were selected to support local flora and fauna without the potential invasive risks associated with bracken. Please refer to the Biodiversity Management Plan submitted by Enviroguide for further details.

The landscape approach for the Proposed Development has been developed with close coordination between Gannon's and Enviroguide and has taken the above commentary by DLR into consideration.

iii. The planting of gorse is not recommended given its invasive nature and although it is native it is likely to arrive back to the site naturally over time. It is also considered a fire fuel and not suitable for a boundary treatment (as a planted species) along the edge of a residential development.

Applicant Response:

In response to the Council's recommendation to avoid the planting of gorse due to its invasive tendencies and fire risk, we confirm that gorse has been excluded from the species selection for the conifer boundary area. We agree that gorse, while native, can easily reestablish itself naturally on the site and does not align with the goals for a safe and sustainable boundary planting in a residential area.

iv. Any plant species of the proposed development will be checked by the ecologist for any likely chance of becoming invasive or spreading to the adjacent Fitzsimons Woods pNHA including any dogwood species.

Applicant Response:

We confirm that all plant species proposed for the development have been thoroughly reviewed by an ecologist from Enviroguide and no species with the chance of becoming invasive is proposed.

v. Cutting of ivy from existing trees should not be the default approach by the Arborist or for tree management without good reason and it would be requested that if any ivy cutting is planned that it is done in consultation with DLR Biodiversity Officer and Parks.

Applicant Response:

As noted within Section 6.1.1 of the Wildlife Refuge and Biodiversity Management Plan, routine ivy cutting will not be the default management approach for existing trees at the Site and will be carried out with the agreement of DLR Biodiversity Officer and Parks. There are limited trees within the Site of the Proposed Development with minor removals required as part of the proposed works. Trees at the Site provided no bat roost potential during the surveys and are largely to be retained along all of the boundaries of the Site. The EcIA includes a pre-felling assessment for bat roost potential for all trees to be felled at the Site as part of the Proposed Development.

c) A revised Green Infrastructure Plan

The provision of a wildlife corridor/biodiversity refuge is very welcomed and has considered the wider DLR Ecological Network, in terms of the provision of the wildlife corridor/biodiversity refuge for protected species. However, the following important points are made:

a) The Green Infrastructure Plan states:

i. Deer: The site design will accommodate native deer populations, with designated corridors for their movement. These areas will be kept free from human interference and contain vegetation that is favourable for deer foraging. The presence of deer will contribute to the overall biodiversity of the site and enhance the natural ambiance of the development.

As noted in the government report - Deer Management in Ireland - A Framework for Action 2015

ii. The role of deer as a valuable component of biodiversity must be recognised. However, this must be balanced with an equal recognition of the potential for deer to impact adversely on a range of other biodiversity values, particularly where conservation habitats and their dependent species are concerned.

Therefore, it is requested that the Green Infrastructure Plan is revised to remove any references to non-native deer species, from the wildlife corridor/biodiversity refuge. The wildlife corridor/biodiversity refuge is not to be considered as a 'foraging' area for non-native deer that may damage the biodiversity planting and will not achieve the mitigation that is needed for biodiversity, as part of the proposed development.

This does not remove the need to allow for a safe route for the deer and it recommended that it be considered outside of the wildlife corridor on the site where there are other routes for the deer to allow them to traverse the site safely.

It is requested that the ecologist addresses this matter in the EcIA and all other documents and reports.

Applicant Response:

The above commentary from DLR regarding the treatment of non-native Sika deer (*Cervus nippon*) in the Green Infrastructure Plan prepare by Gannon's and Associates has been addressed in the revised landscape drawings and report, as well as the EcIA. The wildlife refuge is not designated for non-native deer but rather for the local wildlife assemblage as a whole. Deer currently use the Site and the surrounding lands and will likely continue to do so in some shape or form for the lifetime of the Proposed Development as part of the local wildlife assemblage.

Gannon and Associates have reviewed the Green Infrastructure Plan and removed all references to non-native deer species from the wildlife corridor/biodiversity refuge. This area will no longer be considered a foraging zone for non-native deer, as their presence could harm biodiversity planting efforts and compromise the intended ecological mitigation.

d) A Wildlife Corridor and Biodiversity Refuge Management Plan is required, that addresses the following areas:

i. The integrity of the wildlife corridor/biodiversity refuge will require protection into the future from pressures from land use, from residential activities and from climate change in the long-term. Therefore, a Wildlife Corridor and Biodiversity Refuge management plan will be provided by a suitably qualified ecologist with input by a landscape architect, to demonstrate how it will be created, timing of its development relative to the phasing of the proposed site and construction works, management in the long-term for the habitats and species and also a monitoring programme over the course of its development and in the long-term, for agreement with DLR Biodiversity Officer. It is requested that it will include the cross sections of the wildlife corridor/biodiversity refuge to ensure it is of sufficient area/length/width to function and protect wildlife.

Applicant Response:

Gannon and Associates have revised the Landscape Masterplan and prepared cross sections of the wildlife corridor/biodiversity refuge to ensure it provides sufficient area, length, and width to effectively function and protect wildlife. For specific details, please refer to the drawing 23170_Blackglen_PA_I_GIM.

Additionally, a comprehensive Wildlife Refuge and Biodiversity Management Plan (WRBMP) has been prepared for the Proposed Development by Enviroguide with input from Gannon's and Associates landscape architects and accompanies this application under separate cover.

The WRBMP describes the creation of the refuge area and its management into the future, along with the required monitoring approach to ensure its success. The final creation, management and monitoring approach will be confirmed with the agreement of the DLR Biodiversity Officer should grant of planning be received. A cross section of the wildlife refuge is provided within the within the Green Infrastructure Map and the Landscape Report prepared by Gannon's.

ii. It is noted that the Green Infrastructure plan shows arrows are indicating that that there is a particular direction that species will go which is not the objective of the wildlife corridor/biodiversity refuge as it has many functions not just a connection to the north. This may leave the GI open to misinterpretation.

Applicant Response:

The arrows on the Green Infrastructure Plan indicating directional movement of species have been removed from drawing 23170_Blackglen_PA_I_GIM. This adjustment clarifies that the wildlife corridor/biodiversity refuge is intended to support a range of ecological functions, not just a connection to the north, thereby avoiding any potential misinterpretation of its purpose.

iii. It is requested that signage regarding the wildlife corridor/biodiversity refuge would be agreed with DLR Biodiversity Officer in terms of content.

Applicant Response:

Signage for the wildlife corridor and biodiversity refuge has been developed and wording subject to agreement with DLRCC, ensuring that the content aligns with the ecological objectives and effectively communicates the purpose and importance of the area.

e) An Invasive Species Management Plan is required that address the following areas:

i. It is noted that some of the invasive species such as Winter Heliotrope have more recently been identified as highly impactful species (EPA report) and all IAS will be reassessed based upon more recent reports and data.

ii. An Invasive Alien Species Management Plan will be prepared by an invasive species specialist for the proposed development. This plan will be also incorporated into a revised CEMP.

iii. The invasive species specialist may be required at various stages of the proposed development and will be included in the CEMP, along with their role and any IAS treatments, where relevant.

Applicant Response:

An IASMP has been prepared by INVAS Biosecurity for the Site of the Proposed Development and is Appended to EcIA in Appendix V. The above commentary by DLR has been addressed within the relevant sections of the IASMP and EcIA. The IASMP will also be appended to the CEMP for reference. The mitigation measures within the EcIA and CEMP are aligned with those included in the IASMP

f) Lighting

It is requested that the lighting plan will exclude lighting of internal walkways and ensure no lighting along the wildlife corridor/biodiversity refuge. Words such as 'minimised or avoided' in the EcIA are not transparent and do not assess fully any potential impacts of lighting on bats or other nocturnal species including any created habitats such as the wildlife corridor/biodiversity refuge.

Applicant Response:

The above comment has been addressed within the revised EcIA. The lighting plan for the Site has been designed with Enviroguide's ecological input. Light spill from the Proposed Development has been restricted to 0-1 lux along the wooded boundaries of the Site, including the designated wildlife refuge corridor located along the southern and eastern boundaries of the Site. The wildlife corridor area coincides with a known bat commuting/foraging route based on the bat surveys conducted at the Site to date.

g) A Construction and Environment Plan (CEMP)

i. It is requested that the CEMP details of the primary responsibilities of the Project Ecologist/Ecological Clerk of Works (PE/ECoW) as follows:

- ***Act as the contact for the Planning Authority and agree the frequency and number of site inspections and monitoring programme for the implementation of the biodiversity related mitigation of including the EcIA, CEMP and also the Landscape Plan.***
- ***Act as the primary on-site ecological contact for the PC and SM regarding implementation of the Biodiversity related mitigation of the EcIA, CEMP and also the Landscape Plan;***
- ***Ensure compliance with all Biodiversity related mitigation of all documents of the Planning file including the EcIA, CEMP and also the Landscape Plan;***
- ***Request relevant records and documentation from the SM where necessary;***
- ***Attend routine meetings with the SM;***
- ***Keep detailed records of any ecological incidents and the remedies required and implemented. Report these to the PC and Planning Authority;***
- ***The PE/ECoW shall produce the staged monitoring reports in agreement with the Planning Authority on the implementation of Biodiversity related mitigation of the EcIA, CEMP and also the Landscape Plan. The PE / ECoW shall submit these directly to the Planning Authority and to the PC.***
- ***The PE / ECoW shall also act as overall technical advisor to the PC and SM regarding the implementation of all Biodiversity related mitigation of the EcIA, CEMP, and also the Landscape Plan.***

ii. It is requested that the CEMP will include the following text for clarity to any contractors: No modifications to the CEMP can be made post planning permission that will alter the outcomes of the ecological assessments in terms of significance of impacts. Therefore, no modifications can be made without prior agreement with the Planning Authority of DLRCC and no modifications will be proposed that will negatively impact biodiversity.

It is requested that the invasive species specialist will provide input to the biosecurity measures of the CEMP.

iii. It is requested that the invasive species specialist will provide input to the biosecurity measures of the CEMP.

Applicant Response:

We can confirm that the requested text has been added to the updated Construction & Environmental Management Plan (Z040-XX-XX-RP-C-0107) under Chapter 2 – Overview of the CEMP. Biosecurity measures have also been included as requested.

3 Specific Information to be Provided with LRD Planning Application

The LRD Opinion includes a section requesting that specific information be provided as per Article 16A(7) with any LRD Application in order to facilitate a full assessment of the scheme. This Section of the report quotes the relevant section of the LRD Opinion and cross references the additional information / reports accompanying the Planning Application documentation for the convenience of the Planning Authority.

a) Summary of Consultations and response to meetings

Applicant Response:

The applicant and design team formally engaged in preliminary discussions with the Planning Authority on the 29th of April 2022, presenting a draft outline of the proposed development under Reference PAC/LRD1/003/24.

Comments from the Section 247 pre-planning meeting with Dún Laoghaire-Rathdown County Council (DLRCC) representatives present at the meeting were considered and the design team prepared an updated proposal based on the feedback received.

Following this a Section 32B Opinion Meeting was held with DLRCC on the 25th July 2024. Please see summary below of changes proposed at the S32B Meeting in relation to the S247 Meeting and final proposed development now provided for in this LRD application.

Table 5 - Comparison Development Statistics Table

Development Parameter	**Proposal at S247 Stage 1**	**Proposal at S32B Stage 2**	**Final Planning Application at Stage 3**
Application Site	3.7ha	3.7ha	**Gross - 38,363 m2 (3.83 ha)** **Net - 32,422 m2 (3.24 ha)**
LRD including Childcare Facility	LRD including Childcare Facility	LRD including Childcare Facility	**LRD including Childcare Facility**
No. of residential units	192 no. units • 1 Bed units: 33 no (17.2 %) • 2 Bed units: 86 no (44.7 %) • 3 Bed units: 61 no (31.7 %) • 4 Bed units: 12 no (6.2%)	192 no. units Apartment mix – • 1 Bed units: 33 no (17 %) • 2 Bed units: 78 no (41 %) • 3 Bed units: 27 no (14 %) Duplex apartment mix – • 1 Bed units: 6 no (3 %) • 2 Bed units: 20 no (10 %) • 3 Bed units: 14 no (7%) Houses – • 3 Bed units: 14 no (7 %)	**192 no. units** Apartment mix – Block A1-2: • 1 Bed units: 5 no (2.6 %) • 2 Bed units: 26 no (13.5 %) • 3 Bed units: 10 no (5.2 %) Block B-4: • 1 Bed units: 28 no (14.6 %) • 2 Bed units: 52 no (27.1 %) • 3 Bed units: 17 no (8.5 %) Duplex apartment mix – • 2 Bed units: 6 no (3.1 %) • 3 Bed units: 20 no (10.4%) • 4 Bed units: 14 no (7.3%) Houses – • 3 Bed units: 14 no (7.3 %) **Overall unit mix** • 1 Bed units: 33 no (17.2 %) • 2 Bed units: 84 no (43.8 %) • 3 Bed units: 61 no (31.8 %) • 4 Bed units: 14 no (7.3%)

Density	Gross density 51.9 dph Net density 61dph	51.05 units per ha (net density)	**59.22 units per ha (net density)**
Plot Ratio	1.98	1.46	**0.67**
Site Coverage	22.3% (exc. podium)	22.2%	**22.2% (8,526 m2)**
Communal Open Space	Total 2,639 sqm	Total 2,959 sqm (7.86 sqm)	**2,168 m2 (5.4% of site area)**
Public Open Space	Total 8, 908 sqm (24%)	Total 8, 370 sqm (22.25% of site area)	**8,687 m2 (22.3% of site area)**
Wildlife Corridor	4,594 sqm	4,618.51 sqm (12.28%)	**4,666 sqm (11.9% of site area)**
Resident Amenity Space	418 sqm (rate 2.17m2/unit)	Resident Amenities Area (Block A1+2) = 386.9sqm (Rate 2.02 m2/unit)	**Resident Amenities Area** Block A1 & A2 = 386.9 sqm (Rate 2.01 m2/unit)
Height	2-4 Storeys	2-5 Storeys	**2-5 Storeys**
Dual Aspect Units	138 units (72%)	158 units (82%)	**155 units (80.7%)** • Blocks A1– 12 units (80%) • Block A2 – 22 units (84.6%) • Block B1&B2 – 34 units (66.7%) • Block B3&B4 – 33 units (71.7%) • Block C - 40 units (100%) • Block D – 14 units (100%)
Car Parking	247 spaces (ratio 1.28)	Total - 261 spaces (ratio 1.36) Apartment Blocks Basement car park blocks B1 & B2 = 61 Podium car park blocks B1 & B2 = 13 Podium car park blocks B3 & B4 =21 = total 95 no. car parking spaces Duplex Units + Houses Surface level – lower hillside = 61 Surface level– lower hillside = 77 Houses = 28 = total 166 Including 13 no. accessible spaces (5% of 261)	**Total - 226 spaces (ratio 1.18)** **Apartment Blocks** Basement car park blocks B1 & B2 = 61 Podium car park blocks B1 & B2 = 13 Podium car park blocks B3 & B4 =21 = total 95 no. car parking spaces Duplex Units + Houses Surface level – lower hillside = 43 Surface level– upper hillside = 60 Houses = 28 = total 131 Including 12 no. accessible spaces (5% of 226)
Motorbike parking spaces	N/A	Total - 9 no. spaces - Breakdown: Podium car park blocks B1 & B2 = 5 Podium car park blocks B3 & B4 =4	**Total - 9 no. spaces - Breakdown:** Podium car park blocks B1 & B2 = 5 Podium car park blocks B3 & B4 =4

Cycle Parking	298 (ratio 1:5)	399 resident bike spaces (ratio 1:5) 66 visitor bike spaces	**Total – 484 no. bike space (ratio 2.52)** 446 no. long stay 38 no. short stay
Childcare Space	401 sqm (childcare facility) 170 sqm (outdoor play area)	381.9 sqm (childcare facility) 170.3 sqm (outdoor play area) (42.4 childcare places)	**Block A1** 378.2 sqm (childcare facility) 170 sqm (outdoor play area) (42.4 childcare places required – proposed facility can accommodate up to 62 children)
Part V	19 units (block A1 - 15 & block A2 - 4)	19 units (block A1 - 15 & block A2 - 4)	**19 units (block A1 - 15 & block A2 - 4)** Unit Mix • 1 Bed units: 3 no (16 %) • 2 Bed units: 6 no (32 %) • 3 Bed units: 10 no (52 %)

As evidenced above, all feedback from Dún Laoghaire-Rathdown County Council has been closely considered in the design of the proposal. We trust that the final proposal submitted addresses the concerns raised by the Planning Authority at the Section 247 Meeting and subsequent LRD Meeting and Opinion.

In this regard it is submitted that the proposed development has evolved to be a high-quality development completely adherent to local and national standards and guidelines and fully in accordance with the proper planning and sustainable development of the area. An full outline of the final proposed development is included in the Planning and Statement of Consistency Reports prepared by Brock McClure submitted with this application.

b) ***Details regarding site ownership and the red line boundary position and any agreements with adjoining landowners regarding prospective future links (as applicable).***

Applicant Response:

Please find attached site layout plan prepared by OMP Architects which sets out the full extent of site ownership. In additions please also find attached letter of consent from Dun Laoghaire Rathdown County Council for works to lands within their ownership.

c) ***Details regarding quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc.***

Applicant Response:

As set out above in section 2.1 – Item 1 Landscaping, please refer to the opinion response report prepared by Gannon and Associates Landscape Architects which is submitted as part of this application. A full quantitative and qualitative assessment has been provided in accordance with the provisions as set out in the Dun Laoghaire Rathdown County Development Plan 2022-2028 (DLRCC Development Pan). In summary, the current development plan requires 15% of the site area to be dedicated for public open space. We are proposing a total of 23.09% which includes natural play areas, fitness areas, and the dog park. Circulation spaces such as footpaths between buildings, and water attenuation have not been included in the overall calculations as requested.

The DLRCC Development Plan requires an area of 1,320sqm of communal open spaces for the development. We are proposing 2,168sqm which represents an over provision of 160% communal open

space. This exceeds the required standards outlined in the DLRCC Development Plan and as required in the Sustainable Urban Housing, Design Standards for New Apartments.

	Public Open Space including:	**Area, Sq.m**	**%, of the site**
	Play provision of them		
	- Natural Area for Play	412.79	
	- Fitness Area	54.84	
	- Dog Park	126.98	
	TOTAL	**8,686.56**	**23.09**
	Communal/Semi-private Open Space including:		
	- Podiums	1201.23	
	- Courtyards	966.86	
	Play provision of them		
	- Local Area for Play (LAP)	169.03	
	- Accessible Roof Gardens	424	
	TOTAL	**2,168.09**	**5.76**
	Widlife Corridor	**4,665.70**	**12.40**

Figure 8 - Open Space Provision as per drawing 23170 Blackglen PA_I _POS

In addition to the above, all apartments, duplexes and houses have access to private open space in the form of balconies, terraces, and gardens in compliance with the standards set out in the 2023 Apartment Guidelines and the Development Plan 2022-2028.
The proposed open spaces have been designed to provide a range of recreational opportunities and meet the functional needs of residents. Public and communal spaces are strategically located to encourage social interaction, active recreation, and safe play areas. The detailed design ensures that these spaces are accessible, secure, and contribute positively to the overall functionality of the development. For additional details, please refer to drawing 23170_Blackglen_PA_I_POS prepared by Gannons and Associates submitted as part of this application.

d) ***A complete set of floor plans, elevations, including contiguous elevations, and long sections, boundary treatment plan, in addition with verified views, preferably including winter views, that would assist in understanding the relationship between the proposed development and its context. For clarity, the floor plans for all units shall have bedrooms clearly delineated as such (rather than, for example, 'bedroom/study') and shall be match the content of the Housing Quality Assessment (see below) in relation to same.***

Applicant Response:

Please find attached full updated set of drawings to include Architectural Design Statement and Housing Quality Assessment which sets out in detail the use of all rooms. In addition a complete set of floor plans, elevations, including contiguous elevations, and long sections, boundary treatment plan, verified views, have been updated and included with the application.

e) ***A Housing Quality Assessment (HQA) which provides the specific information regarding the proposed apartments required by the Dun Laoghaire-Rathdown County Development Plan 2022-2028, the 2023 Guidelines on Design Standards for New Apartments, and the 2024 Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (the 'Comact Settlement Guidelines').***

The assessment should also demonstrate how the proposed apartments comply with the various requirements of the Development Plan and the guidelines. Where a conflict may arise between the Development Plan and those guideline documents, the Applicant shall provide a detailed planning rationale with regard to which document(s) is(are) being relied upon and why – and notwithstanding any precedence the guidelines have.

Applicant Response:

Please find attached Housing Quality Assessment prepared by OMP Architects which now provides all required information regarding the apartments in relation to the Dun Laoghaire-Rathdown County Development Plan 2022-2028, the 2023 Guidelines on Design Standards for New Apartments, and the 2024 Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (the 'Comact Settlement Guidelines').

f) ***A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views, (preferably including winter views), that would assist in understanding the relationship between the proposed development and its context.***

Applicant Response:

This is a repeat of 3.5 (D) above.

g) ***A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s, communal facilities, and publicly accessible retail/service elements of the proposed development. The timber external finishes of the proposed duplex units is noted and while acceptable in principle, detailed information shall be provided with regard to its durability, maintenance, and appearance etc. and including with regard to these matters long- term and appearance from adjacent surroundings and also as potentially viewed from medium, and any long-distance views, and particularly where used on upper floor façades. With similar regard to the indicted external finishes comprising indicated white/off-white/ grey brick or other masonry or concrete finishes of proposed blocks, including directly facing onto Blackglen Road that are noted, and while acceptable in principle; detailed information should be provided with regard to their maintenance and appearance and including with regard to their appearance from adjacent surroundings and also as potentially viewed from medium, and any long-distance views (including winter views) – in this respect also, consideration should be given to the use in parts of the development where most relevant (e.g. facing outward from the scheme) of a palette of muted/dark materials more likely to integrate the proposed development into its natural backdrop, particularly in any visually sensitive portions of the subject site. These views (including long-distance (winter) views) should be provided in rendered coloured elevations and CGI's. Otherwise, particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long-term management and maintenance of the proposed development, and a life cycle report for the apartments in accordance with Section 6.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2023). [Noting also item 3 frontage and item 5 matters above, and Building life-cycle report item below]***

Applicant Response:

Please find submitted as part of this application a comprehensive Architectural Design Statement prepared by OMP Architects which sets out all proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s, communal facilities, and publicly accessible retail/service elements of the proposed development.

In addition, please find updated CGIs prepared by Modelworks to include long distance winter views.

h) A Tree Survey Report and Arboricultural Impact Assessment for site and in relation to any impact on surrounds.

Applicant Response:

Please see attached Tree Survey Report and Arboricultural Impact Assessment reports prepared by Enviroguide submitted with this application.

i) A full suite of construction management documents including, inter alia, a Construction and Environmental Management Plan (CEMP), A Noise Impact Assessment, an Operational Management Plan (OWMP), and Construction and Demolition Waste Management Plan.

Applicant Response:

Please find included with this application a full suite of construction management documents to include the CEMP, OWMP, Construction and Demolition Waste Management Plan by OCSC Consulting Engineers and a Noise Impact Assessment by Enfonic.

j) A full set of drainage engineering drawings.

Applicant Response:

Please find submitted with this application a full suite of drainage engineering drawings by OCSC Consulting Engineers.

k) A Social Infrastructure and Community Audit

Applicant Response:

Please find submitted with this application a Social Infrastructure and Community Audit prepared by Brock McClure Planning and Development Consultants.

l) A final Building Lifecycle Report

Applicant Response:

Please find attached Building Lifecycle Report prepared by Aramark submitted with this application.

m) Details regarding the long-term management of both the apartment elements , and non-residential development and any communal facilities.

Applicant Response:

Please find attached Property Management Report prepared by Aramark submitted with this application.

n) A revised Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking (or lack thereof) provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.
Details of pedestrian /cycle links to the surrounding areas and sites should also be given, inclusive of any potential links in the short, or long-term with adjacent lands, and including clarity of treatment of space adjacent to Woodside Road. [Regard also should be had to the DLRCC internal departments reports in this regard including Biodiversity, and Parks & Landscaping, and noting previous planning history].

Applicant Response:

Please find attached revised Traffic and Transport Assessment by OCSC which now includes a rationale for the proposed car parking provision for the scheme. In addition, please also drawing pack by OMP and their accompany design states which includes details of proposed pedestrian / cycle links to the surrounding areas.

o) Hard and Soft Landscaping Plans

Applicant Response:

Please find attached Hard and Soft Landscaping Plans prepared by Gannon and Associates Landscape Architects.

p) A final Telecoms Impacts Assessment and Utilities Report

Applicant Response:

Please find attached Telecoms Impacts Assessment and Utilities Report prepared by ISM.

q) Taking-in-Charge (TIC) details (as applicable), including on Site Layout Plan.

Applicant Response:

Please find attached Taking in Charge drawing prepared by OMP Architects.

r) A letter from Irish Water (Uisce Eireann) confirming that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development obtained no more than 6 months before the date of lodgement of the LRD Application.

Applicant Response:

Please find attached Confirmation of Feasibility by Uisce Eireann included with the material submitted by OCSC Consulting Engineers.

s) Public lighting details, in line with the comments made by the Public Lighting Officer at the Stage 2 meeting held on 25 July 2024. Additionally, the impact of public lighting within, and on the surroundings – including evening and night-time, long-distance (including winter) views of the scheme should be assessed (including any CGI's where relevant) - and including noting items of the earlier DLRCC Public Lighting planning report where relevant [and with regard to the other internal DLRCC reports including Biodiversity, Parks & Landscaping, and Transportation].

Applicant Response:

Please find attached updated lighting report prepared by OCSC consulting engineers which now fully addresses all the concerns noted in the opinion.

t) Response to Climate Action Development Plan Policy.

Applicant Response:

Please find updated Energy and Sustainability / Climate Action Report by OCSC Consulting Engineers.

u) Details of works and landscape integration with adjacent cycle ways and road improvement measures on Blackglen Road and the immediate environs of the subject site.

Applicant Response:

Please find attached accompany reports and drawings by both Gannon and Associates and OCSC Consulting Engineers which now show details of works and landscape integration with adjacent cycle ways and road improvements measures on Blackglen Road and the immediate environs. In addition, please also refer to the updated site layout plan by OMP Architects.

v) ***Phasing Plan***

Applicant Response:

We can confirm there is no phasing plan being proposed for the development. The development is proposed in one complete phase only.

w) ***Ecological Impact Assessment (EcIA).***

Applicant Response:

Please find attached EcIA prepared by Enviroguide Consulting Engineers.

x) ***EIAR Screening Report and Appropriate Assessment Screening Report.***

Applicant Response:

Please find attached EIAR Screening Report and AA Screening Report prepared by Enviroguide Consulting Engineers.

y) ***Details related to any Part V provision - noting the DLRCC Housing report where relevant. In the event the proposed development is considered to be exempt from Part V requirements, correspondence from the Housing Section of Dun Laoghaire Rathdown County Council confirming that position shall be submitted by the Applicant.***

Applicant Response:

Please find attached Part V pack sent to the housing section of DLRCC and correspondence confirming they are in agreement with the proposal.

z) ***The table above with the summary proposal statistics includes figures, as stated, taken from submitted Planning Report. These figures should not be at variance with those from the Architectural and other Design Statements. Any future planning application must contain consistent figures/information throughout.***

Applicant Response:

We can confirm that the proposal statistics as submitted in the planning report are consistent with the figures as set out in the Architectural Design Statement.

aa) ***A Sunlight / Daylight Assessment Report***

Applicant Response:

Please find attached Daylight and Sunlight Assessment Report as prepared by OCSC Consulting Engineers.

bb) ***The documentation outlined in the Biodiversity Officer's report, with an overall response from the Applicant in their response to this Opinion document. The Applicant's response shall include a detailed section/chapter that explains how the overall content of those documents addresses the concerns and items raised in the Biodiversity Officer's report.***

Applicant Response:

Please find attached standalone opinion response report prepared by Enviroguide Consulting Engineers which has addressed all concerns raised by the Biodiversity Officers report.

4 Conclusion

This report, read in conjunction with the Design Team's accompanying reports and drawings addresses, in full the issues raised by the Planning Authority in the LRD Opinion dated 23rd of August 2024 and has been lodged within the requirement timeframe (6months).

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 DLRCC'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.