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Dún Laoghaire-Rathdown County Council
Marine Road
Dún Laoghaire
Co.Dublin

17/12/2024

T-WM
Z040

RE: RESPONSE TO LRD OPINION REPORT

Dear Sir/Madam

This document serves as a response to the opinion report issued by Dún Laoghaire-Rathdown on the Blackglen LRD located on lands at Blackglen Road, Sandyford. This responses below are related to all transportation opinions noted, as well as any opinions related to the two construction reports. Other opinions have been addressed by other design team members in separate documents.

5. Road Infrastructure in the Vicinity of the Site

Item 5 — 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.

Response — **Construction drawings for the Blackglen Road Improvement Scheme was obtained from DLR. These have been used to improve the access to the development and ensure that all proposed active travel infrastructure (walking and cycling) ties in with the recently constructed infrastructure. The road drawings have been updated to reflect this change. Please see drawing Z040-OCSC-XX-XX-DR-C-0110 for more information.**

6. Environmental Enforcement

Item 6a — 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 rockbreaking and its prospective impacts by way of noise and vibration should also be thoroughly dealt with in the final Application documentation.

Response — **A site investigation was submitted with the application. Additional information has been added to the 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). In addition, the site investigation has also been appended to the CEMP for more clarity.**

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Item 6b 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.

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).**

Item 6d The basic information required at planning application stage is as follows: Materials Source and Management Planning identifying the type of material/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 2010).

Response **A full Resource & Waste Management Plan was prepared as submitted as part of the application (Z040-OCSC-XX-XX-RP-C-0108). This report was 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. Text was also added to the report to note it is a 'live' document. These changes were confirmed with the relevant department in DLRCC.**

Item 6e Procedures to enable tracking of all waste generated to final destination.

Response **This is detailed in the Resource & Waste Management Plan (Z040-OCSC-XX-XX-RP-C-0108) submitted as part of the planning application under Chapters 5 and 6.**

Item 6f 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;

- Environmental Management and Monitoring Proposals
- Site Hoarding Proposals
- Complaints Management Proposals

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Response **The requested information is available in the Construction & Environmental Management Plan (Z040-OCSC-XX-XX-RP-C-0107-S4-P03):**

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

7. Transportation Planning

Item 7a 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 service along Blackglen Road by residents of the proposed development.

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).**

Item 7b 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.

Response **An indicative location for a possible future connection has been identified. This opinion has been addressed in more detail by the architect.**

Item 7c 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.

Response **The quantum of car parking proposed has been amended to adjust the visitor parking spaces for apartments to the Development Plan**

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Standard, which results in 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 (Chapter 6) 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.

Item 7d 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.

Response **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).**

Item 7e 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.

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.**

Item 7f 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.

Response **A detailed Quality Audit has been carried out by Bruton Consulting and has been included in the submitted application. All measures**

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recommended by the Auditor have been incorporated into the development.

Item 7g — 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.

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.**

8. Parks & Landscaping

Item 8a — 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.

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.**

11. Biodiversity

Item 11f — 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.

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- 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.

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.

Response **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.**

Yours sincerely

Wian Marais
For O'Connor Sutton Cronin