

BALLYMASTONE PHASE 3

RESPONSE TO LRD OPINION

Large-Scale Residential Development Stage 3
Planning Application

BSM

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**Brady Shipman
Martin**

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Environment**

Client:

Glenveagh Living Limited

Date:

21 October 2025

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1 INTRODUCTION

This Response to LRD Opinion has been prepared as part of a Large-Scale Residential Development (LRD) Stage 3 Application to Fingal County Council (FCC), on behalf of Glenveagh Living Limited. The subject application site (hereinafter referred to as ‘the site’) is located at lands at Ballymastone, Donabate, Co. Dublin. The site is c. 11.28ha in area.

The LRD Opinion on this proposed development was issued by FCC at the end of July 2025.

This response has been prepared with regard to inputs provided by the wider Design Team, the members of which are listed in **Table 1-1**.

Specific responses from MDO Architects, DBFL Consulting Engineers, and CSR Landscape Architects to the Opinion received, are incorporated into their corresponding reports, and are summarised here for completeness. Additionally, where design changes resulted, or information was requested across the Design Team, this has also been incorporated into the corresponding reports and documentation submitted with this application.

This Response to LRD Opinion Report should be read in conjunction with the full application documentation submitted for this proposed development.

Table 1-1: Design Team

Design Team Member	Role
Glenveagh Living Limited (the Applicant)	Applicant
Brady Shipman Martin (BSM)	Planning and Environmental Consultant (Agent)
MDO Architects (MDO)	Architectural Consultant
DBFL Consulting Engineers (DBFL)	Engineering Consultant
Cunnane Stratton Reynolds Land Planning and Design (CSR)	Landscape Architecture Consultant
IN2 (IN2)	Daylight and Sunlight Consultants
John Morris Arboricultural Consultancy	Arboricultural Consultant
Modelworks (MW)	Visualisation Consultant
ENX (ENX)	Lighting, Sustainability and Climate Action Consultant
Archer Heritage Planning (AHP)	Heritage Consultant
AWN Consulting Ltd. (AWN)	Resource & Waste / Operational Waste Management and Hydrogeological Consultant
Aramark	Property Management Consultant

2 RESPONSE TO FINGAL COUNTY COUNCIL

In the LRD Opinion issued by Fingal County Council (FCC) at the end of July 2025, it was determined that:

“The Planning Authority has considered the documentation submitted with the consultation request under Section 32B of the Planning and Development Act 2000 (as amended) and is of the opinion that the documentation submitted constitutes a reasonable basis on which to make an application for permission for the proposed Large-Scale Residential Development.”

Additionally, the LRD Opinion noted that:

“Pursuant to Article 16A(7) of the Planning and Development Regulations 2001 (as amended), the prospective applicant is hereby notified that, in addition to the requirements as specified in Articles 20A, 22 and 23 of the Planning and Development Regulations 2001 (as amended), the specific information detailed on the following pages of this report should be submitted with any application for permission that may follow. It is considered that the specified information will assist the Planning authority at application stage in its decision-making process.”

This response report addresses the concerns raised by FCC in the LRD Opinion issued.

2.1 Donabate LAP (Community and Social Infrastructure)

“Donabate has been expanded significantly in recent years, and the wider Ballymastone lands have been subject of a number of recent planning applications facilitating further residential development. On adjacent lands under the applicant’s ownership alone, planning permission reg. ref. LRD0039/S3 (ABP-320885-24) granted permission for 364 no. new residential units (158 no. houses; 82 no. duplex apartment units; and 124 no. apartments), whilst planning permission reg. ref. LRD0008/S3 (ABP-3135288-22) granted permission for 432 no. new residential units (213 no. houses, 126 no. duplex apartment units and 93 no. apartments). The planning authority is cognizant of the significant impact of such growth on demand for social, recreational and educational facilities.

The applicant is therefore requested to provide details and commentary on the provision of social and community infrastructure in report format within any future application submission. At a minimum, such a report should include a planning chronology detailing significant grants of planning permission for residential development in the vicinity, alongside a timeline of expected delivery for such schemes. Details of social, recreational and educational development should also be provided in a similar format, detailing the grants of relevant permissions; the timeline for such delivery as well as any relevant phasing mechanisms in place to deliver same. As part of the submission, a composite plan demonstrating the locations linkages and phasing between such facilities (built out; under construction; or proposed) should also be provided. Ultimately it is important to demonstrate supporting structures and services aligned with residential growth of Donabate.”

A planning history for residential development in the area has been provided in Section 3 of the *Planning Report and Statement of Consistency* prepared by BSM. Additionally, Chapter 3 of the *Environmental Impact Assessment Report* prepared by BSM also examines the planning consents in the area, noting the date of grant, and the duration period during which the schemes can be constructed.

Save for the schemes to be delivered by the Applicant (Ballymastone Phases 1 and 2), it is not possible to know with any degree of certainty when approved schemes will be delivered by others, including by Government or the Local Authority. The EIAR notes if a scheme has started construction.

The *Community and Social Infrastructure Report* prepared by BSM considers existing and permitted community and social infrastructure in the area, considering the receiving environment for Ballymastone Phase 3. Please refer to the *Community and Social Infrastructure Report* prepared by BSM for more information.

Additionally, the *Schools Demand and Childcare Facilities Assessment* prepared by BSM and submitted as part of this application, similarly sets out existing and permitted childcare and school facilities (including those planned by the Department of Education & Youth), proximate to the proposed Ballymastone Phase 3 development.

2.2 Planning Opinion Items

2.2.1 Planning Opinion Item no. 1

“Concerns remain regarding the separation distance between the pumping station and the proposed houses to the north-east of the site. The applicant is advised to refer to the requirements of Objectives IUO7 & DMSO199 of the Fingal Development Plan 2023-2029 and submit revised proposals to address same. Any buffer zone should not encroach on the curtilage of any property so that it would restrict the future development rights of the property owner. The noise / odour producing parts of the pumping station should be clearly identified on the drawing which indicates the separation distances. Having regard to the greenfield nature of the site and the highly vulnerable nature of residential development, the 50m buffer is requested.”

Planning Opinion Item no. 1 relates to Water Services and Drainage Opinion Item no. 5 (please see **Section 2.5.5**).

In response to the above, the site layout has been adjusted to ensure that all existing and proposed units and their curtilage are outside of a 35m setback radius from the pumping station vent pipe, in accordance with Development Plan.

Given the constrained nature of the site, in order to provide expected densities and appropriate use of the land, it is determined that a 35m setback is appropriate, noting that minimum distance from the property boundary set by Uisce Éireann is 15m.

Please refer to the drawing no. 20003-DBF-XXXX-XX-DR-C01-133002 (Proposed Drainage Layout Sheet 2) prepared by DBFL for a more detailed view of the proposed drainage arrangements (and the Infrastructure Design Report prepared by DBFL), which includes the buffer from the pumping station vent. This is also noted in the *Architectural Design Statement* prepared by MDO.

2.2.2 Planning Opinion Item no. 2

“The arrangement of the rear gardens between blocks ‘BT90’ & ‘BT93’ and blocks ‘BD10’ & ‘BT94’ is unacceptable in the current format. Revised proposals providing for active frontage on to the Donabate Distributor Road and POS 7 at these locations are required.”

Planning Opinion Item no. 2 also relates to Architecture, Design and Layout Opinion Item no. 4 (see **Section 0**).

The arrangement of BT90 and BT93 has been altered following the Section 32B (Stage 2) submission, resulting in BD11 fronting onto the Donabate Distributor Road (DDR), providing passive surveillance and eliminating excess buffer space. Please refer to the *Architectural Design Statement* prepared by MDO and drawing no. 23010-MDO-ZZZZ-XX-DR-A01-050005 (PROPOSED SITE LAYOUT PLAN - PLANNING ZONE 5) also prepared by MDO for further detail.

2.2.3 Planning Opinion Item no. 3

“There are concerns relating to the opposing rear boundary walls at blocks ‘BT73’ & ‘BT74’ and ‘BD09’ & ‘BT66’. A revised proposal removing this condition should be provided. This may require an additional residential unit to be located between ‘BT73’ & ‘BT74’ or ‘BD09’ & ‘BT66’ along with associated revisions to the overall block layout.”

Concerns relating to the subject boundary walls are noted, and revisions have been made to improve this area of the proposed development. Please refer to the *Architectural Design Statement* prepared by MDO for more detailed information.

In summary, the proposed boundary wall design has been updated to include a higher-quality brick design, including improved landscaping proposals (please see drawing nos. 19164-2-3123 (Boundary Treatment Plan) and 19164-2-3101 (Landscape Masterplan) both prepared by CSR). The units on the corners of the concerned area (BT74, BT73, BD09 and DT66) all include dual-frontage layouts, meaning there is passive surveillance from 4 no. units onto the street, creating active frontages.

2.2.4 Planning Opinion Item no. 4

"In several areas, the proposed housing block layout fails to provide for a strong building line, with adjacent rear gardens breaking the building line (e.g. block 'BT69' relative to block 'BS09', block 'BZ08' relative to block 'BT70', the eastern end of block 'BT99' relative to block 'BT98' and the 'BD10' units relative to blocks 'BT100' & 'BT102'). Further consideration should be given within the proposed site layout to provide coherent building lines, which provide for strong frontage and better respond to the site boundaries and roads layout."

The layout of the proposed units is consistent with the approach previously permitted for Phases 1 and 2 of Ballymastone, and as such, it is considered appropriate to continue this approach. Noting the concerns raised, the rear elevations of the units that can be seen from the street have been altered to include a brick wrapping, which will create an attractive façade.

Please refer to the *Architectural Design Statement* prepared by MDO for further information.

2.2.5 Planning Opinion Item no. 5

"There are concerns relating to how the northern rear garden of block 'BT72' and the northern rear gardens of blocks 'BT97' & 'BT98' address the roads / pathways to their north. It is noted no passive surveillance is offered from the north of these units and the proposed site layout should ensure passive surveillance and active frontage is provided throughout the development."

The end units of the blocks noted above (BT72, BT97 and BT98) all feature active façades facing the paths/streets that run adjacent to the property, providing passive surveillance to the north.

Please refer to the *Architectural Design Statement* and drawing no. 23010-MDO-ZZZZ-XX-DR-A01-050000 (PROPOSED SITE LAYOUT PLAN – PHASE 3), both of which have been prepared by MDO.

2.2.6 Planning Opinion Item no. 6

"There are concerns regarding the strip of green space between the existing houses at Priory Wood and proposed units at blocks 'BT88' & 'BT89'. This area is not appropriately overlooked, may attract anti-social behavior and is unacceptable in its current format. The applicant is requested to incorporate this space into the rear gardens of proposed blocks 'BT88' & 'BT89' or provide for clearly detailed mitigation measures to prevent anti-social behavior at this location."

There is a small portion of lands shown to the rear of the garden boundary walls of BT89 and BT88, as noted by the Planning Opinion Item. Some existing residents of Priory Wood (nos. 30-41) have relocated their rear garden boundary (including some shed structures), encroaching on the subject site. This encroachment is not reflected on the OS map sheets, and as such, the boundary shown is not fully accurate. The surveyed boundary line is shown on the Landscape Masterplan (drawing no. 19164-2-3101) prepared by CSR.

It is proposed that the rear garden walls of BT89 and BT88 are built as close to the existing fence as possible. The existing vegetation to the sides of the proposed blocks are to be left as is. Please refer to the *Landscape Strategy Submission* prepared by CSR for more information.

2.2.7 Planning Opinion Item no. 7

"All side / rear walls and side / rear gable ends facing and/or visible from public open spaces and streets shall be of a brick finish and not render (e.g. both the east and west elevation of block 'BZ08')."

Regarding BZ08, the design was reviewed with regards the above concern. It is considered that the brick to the ground floor and render at first and second floor provides architectural consistency with the variation in materiality of BA09 and the surrounding houses and duplexes and also contribute to a harmonious overall architectural treatment, and also in-keeping with Phase 1 and Phase 2, so it is not intended to amend these elements. Please refer to Section 6.1 of the *Architectural Design Statement* prepared by MDO for further information and assessment.

2.2.8 Planning Opinion Item no. 8

"All corner units should be provided with dual frontage."

All corner units have been designed with dual frontage, ensuring active façades and passive surveillance onto adjoining streets. Please refer to the *Architectural Design Statement* prepared by MDO and relevant architectural drawings relating to corner units, in particular the elevation drawings, all of which have been prepared by MDO, for further information.

2.2.9 Planning Opinion Item no. 9

"Individual elevations of bin / bicycle storage units should be provided. Bin / bicycle storage units should also be illustrated on the contextual building elevations."

Individual drawings for external bin and bicycle storage units have been prepared by MDO. Please refer to the following drawings:

- 23010-MDO-BX16-XX-DR-A01-070001;
- 23010-MDO-BX17-XX-DR-A01-070001;
- 23010-MDO-BX18-XX-DR-A01-070001;
- 23010-MDO-BX19-XX-DR-A01-070001;
- 23010-MDO-BX20-XX-DR-A01-070001;
- 23010-MDO-BX21-XX-DR-A01-070001;
- 23010-MDO-BX22-XX-DR-A01-070001; and
- 23010-MDO-ZZZZ-XX-DR-A01-061001.

2.2.10 Planning Opinion Item no. 10

"Further details (elevations, sections, plans) on the boundary treatments between the proposed development and the adjoining roads at the Priory are needed. It is unclear if the proposed development is to be accessible from the existing residential development it adjoins. Details on both the existing and proposed boundary treatments are required."

Additional detail regarding the proposed boundary treatments between the proposed development and the adjoining roads at the Priory are provided. Please refer to the *Landscape Strategy Submission* prepared by CSR (page 21). In summary, it is proposed to retain and protect the existing woodland area and large trees, including existing undergrowth, as shown on the Landscape Masterplan (drawing no. 19164-2-3101). Infill planting will be provided to support the creation of a dense hedgerow, which will assist in limiting access into the woodland.

Please refer to drawing no. 19164-2-3131 (Public Open Space – Small Parks), drawing no. 19164-2-3211 (Sections – Small Parks) and drawing no. 19164-2-3123 (Boundary Treatment Plan), all prepared by CSR for further detail.

2.2.11 Planning Opinion Item no. 11

“A finalized phasing proposal is required which shall ensure the proposed childcare facility and open space are delivered in a timely and orderly manner in tandem with the delivery of residential development. The childcare facility shall be delivered as part of phase one of development prior to the occupation of any residential unit.”

Please refer to drawing no. 23010-MDO-ZZZZ-XX-DR-A01-053303 (DEVELOPMENT PHASING) prepared by MDO. This drawing denotes the proposed subphases for delivery, which shows the proposed childcare facility being delivered as part of subphase 3A, which is the first subphase of the proposed development.

2.2.12 Planning Opinion Item no. 12

“Any future application shall clearly detail how the proposed development accords with the provisions, particularly the phasing provisions, of the 2016 Donabate Local Area Plan (as extended).”

Please refer to Section 5.3.2 of the *Planning Report and Statement of Consistency* prepared by BSM. This section of the report demonstrates how the proposed development is in accordance with the Donabate LAP.

2.2.13 Planning Opinion Item no. 13

“It is requested that the proposed residential mix, density and public open space requirements for the development are detailed both in isolation and in the context of the permitted ‘Phase 1’ & ‘Phase 2’ developments.”

Residential mix and density are displayed in diagrams and schedules in the *Architectural Design Statement* prepared by MDO, with additional detail contained within the *Housing Quality Audit*, also prepared by MDO. Information regarding the proposed public open space can be found in the public open space drawings (drawing nos. 19164-3131 to 19164-3135) and the *Landscape Strategy Submission* prepared by CSR. A more general summary of both is contained within the *Planning Report and Statement of Consistency* prepared by BSM.

2.2.14 Planning Opinion Item no. 14

“All residential units must demonstrate compliance with Objective DMS19 of the Fingal Development Plan 2023-2029 i.e. the requirements of the ‘Quality Housing for - Sustainable Communities Best Practice Guidelines’ (2007); SPPRs 1-4 and Section 3.3.3 and Appendix B (relating to density) of the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ (2024); and SPPRs 1-8 and Appendix 1 of the ‘Planning Design Standards for Apartments - Guidelines for Planning Authorities’ (2025). Compliance with Objective DMSO26 of the Fingal Development Plan 2023-2029 is also required to be demonstrated.”

Please refer to *Housing Quality Audit* prepared by MDO for demonstration of compliance with the relevant documents listed, to the MDO *Architectural Design Statement*, and to the *Planning Report and Statement of Consistency* prepared by BSM as part of this planning application documentation.

2.2.15 Planning Opinion Item no. 15

“As the proposed development is for over 100 no. units, any application that may be forthcoming shall clearly demonstrate the location and design features of the 10% age-friendly units required under Objective DMSO37 of the Fingal Development Plan 2023-2029.”

Planning Opinion Item no. 15 also relates to Housing – Part V Opinion Item no. 2 (see **Section 2.4.2**).

Please refer to section 5.1 of the *Architectural Design Statement* prepared by MDO. In summary, all of the proposed houses and a portion of the proposed apartments have been designed as Universal Design and age-friendly units, accounting for c. 61.8% of the overall proposed units, which far exceeds the minimum of 10% specified under Objective DMSO37.

2.2.16 Planning Opinion Item no. 16

“The number of childcare spaces within the childcare facility shall be in accordance with the requirements of the ‘Childcare Facilities’- Guidelines for Planning Authorities’ (2001) and Tusla floor area requirements.”

The proposed size of and number of spaces within the crèche has been determined in accordance with the requirements of the *Childcare Facilities – Guidelines for Planning Authorities (2001)* and relevant Tusla guidance. Please refer to the ground floor plan (drawing no. 23010-MDO-BA09-ZZ-DR-A01-070001 – APARTMENT BLOCK BA09 PLANS) for more detailed information about the layout of the proposed childcare facility, and the *Schools Demand and Childcare Facilities Assessment* prepared by BSM for details on the childcare space provision.

2.2.17 Planning Opinion Item no. 17

“A Taking-in-Charge proposal(s) is required. The applicant is strongly advised to refer to Fingal County Council’s ‘Taking in Charge Policy and Specifications’ document (update May 2022) for guidance (particularly Item 8 of Appendix 6 relating to taken in charge roads being from the back of the footpath).”

Please refer to the following drawings prepared by MDO that detail the proposed taking-in-charge plan:

- 23010-MDO-ZZZZ-XX-DR-A01-054104; and
- 23010-MDO-ZZZZ-XX-DR-A01-054105.

The drawings noted above clearly denote what areas are proposed to be under private ownership, taken-in-charge by Fingal County Council or under the control of the relevant Management Company.

2.2.18 Planning Opinion Item no. 18

“It is noted the site has previously been identified as being in an extensive archaeological landscape and, therefore, an assessment of the potential impacts of this new phase of development on the archaeological, architectural and cultural heritage resources in the receiving environment during the construction and operational phases of the proposed development is required.”

Noting the archaeological heritage in the area, a Cultural Heritage, Archaeology & Architectural Heritage study was undertaken by Archer Heritage Planning Ltd. Please refer to Chapter 15 of the *Environmental Impact Assessment Report* prepared by BSM.

2.2.19 Planning Opinion Item no. 19

“Public lighting proposals are required in accordance with Fingal County Council’s ‘Public Lighting Specification’ requirements. This should include for off-road pathways. The applicant is advised to note the comments of the Parks and Green Infrastructure Division regarding separation distances between proposed trees and lighting and should liaise with Kevin Broderick of the Council’s Public Lighting Section regarding public lighting proposals (Kevin.Broderick@fingal.ie).”

A comprehensive public lighting strategy for the proposed development has been prepared by ENX in coordination with CSR, to ensure that the proposed development is adequately lit for public safety and comfort, whilst also ensuring that there is no adverse impact on biodiversity. Please refer to drawing no. 3260-ENX-XXXX-XX-DR-E01-006001 (Site - Services Layouts - Electrical - Public Lighting) prepared by ENX, drawing no. 19164-2-3124 (Combined Services and Tree Location Plan) and the *Landscape Strategy Submission* prepared by CSR for more detailed information with regard to the proposed public lighting arrangement.

2.2.20 Planning Opinion Item no. 20

“The application should also be accompanied by, inter alia; (relevant Fingal Development Plan 2023-2029 objective in brackets if applicable):

- Screening for Appropriate Assessment (and Natura Impact Statement if applicable) (Objective DMSO1).

- *Architectural Design Statement (Objective DMSO5).*
- *Detailed Housing Quality Audit(s).*
- *Daylight and Sunlight Analysis (Objective DMSO22); (In the event that units do not achieve the required standard, a schedule of compensatory measures provided to each applicable unit should be tabulated. Compensatory measures should include for above minimum provisions in other aspects of the apartment design, such as floor area or private amenity space.).*
- *Building Life Cycle Report(s).*
- *Public art proposals (Objective DMSO194).*
- *Community and Social Infrastructure Audit, including an assessment of school and childcare facilities (Objective DMSO78).*
- *Construction and Demolition Waste Management Plan (Objective DMSO241).*
- *Outline Construction Environmental Management Plan which includes all relevant mitigation measures detailed in other documentation.*
- *Climate Action Energy Statement (Objective DMSO261)."*

The following documentation forms part of the subject planning application pack:

- *Natura Impact Statement* prepared by BSM;
- *Architectural Design Statement* prepared by MDO;
- *Housing Quality Audit* prepared by MDO;
- *Part V - Housing Quality Audit* prepared by MDO;
- *Daylight and Sunlight Analysis* prepared by IN2;
- *Life Cycle Report* prepared by MDO;
- *Community and Social Infrastructure Audit* prepared by BSM;
- *Schools Demand and Childcare Facilities Assessment* prepared by BSM;
- *Resource and Waste Management Plan* prepared by AWN (Appendix 19.1 of the EIAR);
- *Preliminary Construction & Environmental Management Plan* prepared by DBFL; and
- *Climate Action Energy Statement* prepared by ENX.

Information regarding public art is contained within the *Landscape Strategy Submission* prepared by CSR.

2.2.21 Planning Opinion Item no. 21

"Having regard to the nature and extent of the proposed development and that already permitted under 'Phase 1' & 'Phase 2', an Environmental Impact Assessment Report (EIAR) is required as part of any application that may be forthcoming."

Noting the above, an *Environmental Impact Assessment Report* has been prepared by BSM.

2.3 Architecture, Design and Layout Opinion Items

2.3.1 Architecture, Design and Layout Opinion Item no. 1

“At proposed ‘Communal Amenity Space 2’, plans have not been provided for the block to the north of the proposed Duplex Block ‘BZ04’ (i.e. the building wrapping around the north-east corner of the duplex block). It is indicated on the site plans but not on index with plans.”

Please refer to drawing no. store BX17: 23010-MDO-BX17-XX-DR-A01-070001 prepared by MDO which details the plans, sections and elevations of external bin and bicycle store BX17. Additional information is provided in Section 3.4 of the *Architectural Design Statement*, also prepared by MDO, which relates to bicycle storage provision.

2.3.2 Architecture, Design and Layout Opinion Item no. 2

“Opposing rear boundary walls along the southern boundary of ‘BT73’ & ‘BT74’ and the northern boundary of ‘BD09’ & ‘BT66’ should be eliminated with active street frontages introduced to overlook the public realm. This condition is also proposed to the south of ‘BT81’ & ‘BT83’ (i.e. the opposing rear garden walls of ‘BT80’ & ‘BT84’) and should be reconsidered in the urban block design at both locations.”

This item is related to Planning Opinion Item no. 3. Please refer to **Section 2.2.3**.

Concerns relating to the subject boundary walls are noted, and revisions have been made to improve this area of the proposed development. Please refer to the *Architectural Design Statement* prepared by MDO for more detailed information.

In summary, the proposed boundary wall design has been updated to include a higher-quality brick design, including improved landscaping proposals (please see Landscape Drawing). The units on the corners of the concerned area (BT74, BT73, BD09 and BT66) all include dual-frontage layouts, meaning there is passive surveillance from 4 no. units onto the street, creating active façades.

2.3.3 Architecture, Design and Layout Opinion Item no. 3

“The area of left-over green space is to be clarified (to the north of the site, south of the Priory Wood rear gardens and north of the proposed ‘BT88’ & ‘BT89’ block rear gardens).”

Architecture, Design and Layout Opinion Item no. 3 also relates to Architecture, Design and Layout Opinion Item no. 6 (see **Section 2.2.6**).

There is a small portion of lands shown to the rear of the garden boundary walls of BT89 and BT88, as noted by the Planning Opinion Item. Some existing residents of Priory Wood (nos. 30-41) have relocated their rear garden boundary (including some shed structures), encroaching on the subject site. This encroachment is not reflected on the OS map sheets, and as such, the boundary shown is not fully accurate. The surveyed boundary line is shown on the Landscape Masterplan (drawing no. 19164-2-3101) prepared by CSR.

It is proposed that the rear garden walls of BT89 and BT88 are built as close to the existing fence as possible. The existing vegetation to the sides of the proposed blocks are to be left as is. Please refer to the *Landscape Strategy Submission* prepared by CSR for more information.

2.3.4 Architecture, Design and Layout Opinion Item no. 4

“Street frontage to the Donabate Distributor Road should be provided between ‘BT90’ & ‘BT93’. The current proposal, including rear garden walls, results in left over space with no passive surveillance and is unsatisfactory.”

This item is related to Planning Opinion Item no. 2. Please refer to **Section 2.2.2**.

The arrangement of BT90 and BT93 has been altered following the Section 32B (Stage 2) submission, resulting in BD11 fronting onto the DDR, providing passive surveillance and eliminating excess buffer space. Please refer to the

Architectural Design Statement prepared by MDO and drawing no. 23010-MDO-ZZZZ-XX-DR-A01-050005 (PROPOSED SITE LAYOUT PLAN - PLANNING ZONE 5) also prepared by MDO for further detail.

2.3.5 Architecture, Design and Layout Opinion Item no. 5

“The expanse of rear garden walls to the west of ‘BT94’ should be reduced and rationalised to create a regular building line and passive surveillance to public open space at this location.”

BT94 and BD10, at the western side of the site, have been rearranged to provide active frontage onto the proposed open space to the south. Please refer to the *Architectural Design Statement* prepared by MDO and drawing no. 23010-MDO-ZZZZ-XX-DR-A01-050000 (PROPOSED SITE LAYOUT PLAN – PHASE 3) also prepared by MDO for further detail.

2.3.6 Architecture, Design and Layout Opinion Item no. 6

“Contiguous Site Elevation 2 Part 2 is illegible with tree cover, legible elevations are required.”

Noting the above concern, all contiguous elevations have been updated to exclude showing landscaping elements to improve the visibility of the proposed buildings. A note has been included on all relevant drawings explaining that landscaping elements have been removed for visibility.

2.3.7 Architecture, Design and Layout Opinion Item no. 7

“Block ‘BD10’ monopitch rear extension – a rationalisation of the roof design to integrate into the design of the proposed house is required.”

Noting the above concern raised, the design of BD10 was reviewed by MDO. The intention of the mono-pitch rear extension is to provide architectural consistency with other elements of the proposed unit type, including canopies and entrance pop-outs. It is further noted that similar units have been permitted in Phases 1 and 2 of the wider Ballymastone scheme, and as such, it is not intended to alter the design of the rear extension.

Please refer to the *Architectural Design Statement* prepared by MDO, in addition to drawing no. 23010-MDO-BD10-XX-DR-A01-075015 (Unit Type BD10 - Plans, Sections and Elevations) also prepared by MDO.

2.4 Housing – Part V Opinion Items

2.4.1 Housing – Part V Opinion Item no. 1

“As per the signed Development Agreement, the applicant and Fingal County Council have reached an agreement to provide 20% social housing & 20% affordable housing within the proposed development. The applicant has yet to submit a Part V proposal and is advised to do so at their earliest convenience in order to reach an agreement to satisfy their Part V requirement on this development. Submissions and queries can be submitted to PartV@fingal.ie.”

As part of this LRD planning application, a Part V proposal is enclosed. Please refer to Section 1.4 of the *Architectural Design Statement* prepared by MDO. A series of drawings relating to the Part V proposals has also been prepared by MDO. Please also refer to the letter from FCC enclosed as part of this planning application in relation to reaching agreement regarding the proposed Part V housing.

2.4.2 Housing – Part V Opinion Item no. 2

“30% of social housing (Part V) should be fully accessible and designed with a universal design approach to ensure the property will be flexible and can be changed as needed over the course of the occupants’ lifetimes. This includes lift access to units where the entrances are not on the ground floor, level access to balconies, terraces and communal areas, accessible bathrooms with level access showers (or designed to allow for easy conversion) and grounds for grabrails, a soft spot between the bedroom and bathroom for a future door and possible hoist installation, adequate

circulation space, storage etc. in accordance with current best practice guidance. Where these units are proposed as two-storey houses, it should include a bedroom and accessible bathroom on the ground floor level."

Housing – Part V Opinion Item no. 2 relates to Planning Opinion Item no. 15 (see **Section 2.2.15**).

Please refer to Section 5.1 of the *Architectural Design Statement* prepared by MDO. In summary, all of the proposed houses and a portion of the proposed apartments have been designed as Universal Design and age-friendly units, accounting for c. 61.8% of the overall proposed units, which far exceeds the minimum of 10% specified under Objective DMSO37.

The units have been designed in accordance with all relevant guidance and building standards.

2.4.3 Housing – Part V Opinion Item no. 3

"New residential developments of more than 100 units should provide 10% of the units as age-friendly accommodation. The applicant is advised to refer to the Fingal County Council publication '10 ways to create Adaptable and Age Friendly Home' (March 2019) and other relevant and current best practice guidance."

Housing – Part V Opinion Item no. 2 relates to Planning Opinion Item no. 15 (see **Section 2.2.15**).

Please refer to section 5.1 of the *Architectural Design Statement* prepared by MDO. In summary, all of the proposed houses and a portion of the proposed apartments have been designed as Universal Design and age-friendly units, accounting for c. 61.8% of the overall proposed units, which far exceeds the minimum of 10% specified under Objective DMSO37.

2.5 Water Services and Drainage Opinion Items

2.5.1 Water Services and Drainage Opinion Item no. 1

"The Site-Specific Flood Risk Assessment (SSFRA) submitted with the pre-planning documentation is acknowledged and it is noted the submitted assessment confirms no flood risk. The applicant is advised a finalised SSFRA should be submitted with any application for permission that may follow."

A *Site-Specific Flood Risk Assessment* has been prepared by DBFL and included as part of the planning application pack.

2.5.2 Water Services and Drainage Opinion Item no. 2

"The surface water drainage strategy submitted with the pre-planning documentation is acceptable and it is noted the proposals follow through from the permitted 'Phase 1' and 'Phase 2' developments."

The above is noted, and no further response is required. Please refer to the *Infrastructure Design Report* prepared by DBFL, and the accompanying set of drawings in relation to surface water drainage.

2.5.3 Water Services and Drainage Opinion Item no. 3

"It is noted that all below ground attenuation tanks have been confirmed to be Stormtech which aligns with Fingal County Council's taking-in-charge requirements. The applicant is advised any application for permission that may follow should clearly demonstrate same."

Please refer to Section 3.5 of the *Infrastructure Design Report* prepared by DBFL. In summary, all new underground attenuation storage provided as part of the proposed development will utilise Stormtech.

2.5.4 Water Services and Drainage Opinion Item no. 4

“Further details are required to demonstrate how the proposed detention basins integrate into the streetscape / landscape. This should include long / cross sections and invert / top / water levels. All side slopes should to be 1:5 minimum.”

Please refer to Section 3.3 of the *Infrastructure Design Report* prepared by DBFL. The proposed detention basins will be integrated into the streetscape/landscape with side slopes of 1:4, aligning with previous phases of the wider Ballymastone scheme. Please refer to the following attenuation drawings prepared by DBFL:

- 20003-DBF-XXXX-XX-DR-C01-530021 (Attenuation Details Sheet 1);
- 20003-DBF-XXXX-XX-DR-C01-530022 (Attenuation Details Sheet 2); and
- 20003-DBF-XXXX-XX-DR-C01-530023 (Attenuation Details Sheet 3).

2.5.5 Water Services and Drainage Opinion Item no. 5

“There are concerns regarding the proposed buffer zone around the pumping station to the north-east of the site. The higher figure of 50m should apply with all private curtilage outside of this.”

Water Services and Drainage Opinion Item no. 5 relates to Planning Opinion Item no. 1 (please see **Section 2.2.1**).

In response to the above, the site layout has been adjusted to ensure that all existing and proposed units and their curtilage are outside of a 35m setback radius from the pumping station vent pipe, in accordance with Development Plan.

Given the constrained nature of the site, in order to provide expected densities and appropriate use of the land, it is determined that a 35m setback is appropriate, noting that minimum distance from the property boundary set by Uisce Éireann is 15m.

Please refer to the drawing no. 20003-DBF-XXXX-XX-DR-C01-133002 (Proposed Drainage Layout Sheet 2) prepared by DBFL for a more detailed view of the proposed drainage arrangements (and the *Infrastructure Design Report* prepared by DBFL), which includes the buffer from the pumping station vent. This is also noted in the *Architectural Design Statement* prepared by MDO.

2.5.6 Water Services and Drainage Opinion Item no. 6

“The applicant is advised to liaise with Uisce Éireann regarding the proposed water supply and foul drainage arrangements. A Confirmation of Feasibility from Uisce Éireann is required to be submitted as part of any application for permission that may follow.”

Uisce Éireann have issued a Confirmation of Feasibility in relation to the proposed development, which is enclosed as part of the subject LRD planning application documentation within the *Infrastructure Design Report* prepared by DBFL.

2.6 Parks and Open Space

2.6.1 Parks and Open Space: Existing Trees and Hedgerows

2.6.1.1 Parks and Open Space Opinion Item no. 1

“The applicant states that an arborist survey was conducted, the complete tree survey including an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement in accordance with BS 5837: 2012, ‘Trees in relation to Design, Demolition and Construction Recommendations’ should be submitted. The tree survey and documents must be prepared by a suitably qualified arborist / landscape professional. The appointed arboricultural consultant shall be engaged by the applicant for the duration of the project.”

An updated arboriculture survey has been conducted by John Morris Arboricultural Consultancy, which has informed a suite of arboricultural documents including:

- *Arboricultural Impact Assessment & Method Statements – Planning Stage;*
- *Tree Schedule;*
- *Tree Impact & Protection Plan (1 of 1) (drawing no. 25-635-03A);*
- *Tree Constraints Plan (1 of 1)*

Please refer to the arboricultural documentation listed above for further information, in addition to drawing no. 19164-2-3120 (Vegetation Retention and Removal) and the *Landscape Strategy Submission*, both prepared by CSR.

2.6.1.2 Parks and Open Space Opinion Item no. 2

"It is very important that the proposed development not only allows for the retention of trees and hedgerows but also allows for their future growth and management. This is of particular concern for Public Open Space 7 (POS7) and along the northern boundary of the site."

POS7 (now named SP06), and the other areas of retained vegetation, have been redesigned based on site discussion with FCC Parks Officer and Project Ecologist. There will be adequate allowance for future growth of trees and hedgerows.

Refer to Pages 21, 22, and 30 of the *Landscape Strategy Submission* prepared by CSR for layouts and sections containing existing trees and hedgerows.

2.6.1.3 Parks and Open Space Opinion Item no. 3

"It appears from the submitted drawings that the pumping station and part of the detention basin are in very close proximity to trees and hedgerows proposed for retention. Again, it is important that the applicant clearly shows that this vegetation is successfully retained and that access for its maintenance using large scale maintenance machinery (i.e. tractor mounted flail) is provided. To address this, the developer is requested to provide the following:

- *An up-to-date tree survey, including an Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan, and Arboricultural Method Statement, all prepared in accordance with BS 5837:2012 – 'Trees in relation to Design, Demolition and Construction – Recommendations'.*
- *A clear indication of the percentage of hedgerows to be removed, along with a mitigation plan showing the extent of the existing hedgerows to be retained.*
- *A short and long-term maintenance plan for the hedgerows and associated landscaping."*

The pump station and detention basin avoids the root protection areas of the adjacent woodland areas¹. Access from the proposed street to pump station is identified on the Open Space drawings prepared by CSR (reinforced grass).

Please refer to drawing no. 19164-2-3131 (Public Open Space - Small Parks) prepared by CSR.

Please also refer to the submitted Arborist's documentation for the "Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan, and Arboricultural Method Statement".

2.6.1.4 Parks and Open Space Opinion Item no. 4

"The above details are essential to properly assess the impact of the proposed development on existing green infrastructure and to ensure compliance with best practice standards."

Please refer to **Section 2.6.1.3** (Parks and Open Space Opinion Item no. 3).

¹ Note: The pump station and detention basin are part of the approved Phase 2 works.

2.6.1.5 Parks and Open Space Opinion Item no. 5

“A hedgerow appraisal and a 5-Year Hedgerow Management Plan which aims to maintain and enhance the quality of the existing hedgerows shown for retention is required.”

Please refer to **Section 2.6.1.3** (Parks and Open Space Opinion Item no. 3).

2.6.2 Parks and Open Space: Public Open Space Layout**2.6.2.1 Parks and Open Space Opinion Item no. 6**

“It is requested that poorly overlooked open space areas be re-designed at this stage. Areas where gable walls of houses adjoin open space should be redesigned to ensure very good passive supervision of these spaces. (This is of particular concern for Public Open Space 7 (POS7)).”

The block adjacent to POS7 (now named SP06) have been revised so the front facades face the open space.

Please refer to drawing no. 19164-2-3131 (Public Open Space - Small Parks) prepared by CSR.

2.6.2.2 Parks and Open Space Opinion Item no. 7

“The applicant has demonstrated that the proposal meets the requirements in terms of quantity for public open space. However, further details are needed to assess the quality – the actual usability of the proposed open space.”

Please refer to the series of drawings relating to the proposed public open space, and *Landscape Strategy Submission* prepared by CSR for further information.

2.6.2.3 Parks and Open Space Opinion Item no. 8

“The Pocket Park drawing No. 19164-2-104, prepared by Cunnane Stratton Reynolds and dated May 2025, indicates four Pocket Parks: PP04, PP05, PP06, and PP07. The layout of the Pocket Parks appears to be very narrow, and the applicant is requested to clarify the width of the open space. Additionally, all play equipment must maintain a minimum separation distance of 25 metres from the nearest dwelling. The location of the play equipment should also be assessed in the context of adjacent trees and the nearby road, to ensure safe access for maintenance and to safeguard the users.”

Dimensions have been added to the pocket park drawings demonstrating the widths. Low vegetated buffers and knee rails have been proposed in the narrow pocket parks adjacent to roads, to increase security for young users (as discussed with FCC Park Officer). Please refer to drawing no. 19164-2-3134 (Public Open Space - Pocket Parks) and drawing no. 19164-2-3135 (Public Open Space - Pocket Parks), both prepared by CSR. More detail regarding the proposed boundary treatments can be found in drawing no. 19164-2-3123 (Boundary Treatment Plan) also prepared by CSR.

Please also refer to the *Landscape Strategy Submission* prepared by CSR, which demonstrates that play equipment meets the required setback from the nearest dwellings.

2.6.2.4 Parks and Open Space Opinion Item no. 9

“Proposals in relation to tree planting adjoining walls etc. should be in accordance with BS5837:2012 and should be clearly demonstrated and stated on the landscape plan.”

Tree spacing has been designed with consideration to spacing from surfaces and structures stated in BS5837:2012. Tree locations will be re-assessed when preparing detailed design documentation to ensure no clashes.

Please refer to drawing no. 19164-2-3172 (Tree Planting Strategy) prepared by CSR.

2.6.3 Parks and Open Space: Play Provision

2.6.3.1 Parks and Open Space Opinion Item no. 10

"In relation to the proposed play provision, the applicant is required to ensure that it complies with Fingal's Play Policy ('Space for Play- A Play Policy for Fingal'), particularly in relation to separation distances and accessibility. The 25-metre separation distance should be clearly shown."

Play areas have been designed in accordance with FCC play policy, and the 25m separation distances to residential units are shown on the drawings with Local Equipped Area of Play (LEAP) within public open spaces.

Please refer to drawing no. 19164-2-3138 (Play Spaces) prepared by CSR for further information.

2.6.4 Parks and Open Space: Landscape Play

2.6.4.1 Parks and Open Space Opinion Item no. 11

"A landscape plan is required to be submitted as part of any application that may follow and shall include the following:

- *A minimum 25-metre separation distance between dwellings and play facilities, clearly marked on the plan.*
- *The location of all above and below ground services.*
- *A minimum separation distance of 7 metres between lamp standards and new street tree planting. Lamp standards to be located on hard standing surface.*
- *The width of grass verges proposed for tree planting to be clearly labelled. Where trees are to be planted in hard surfaces or grass verges narrower than 1.2 metres between kerbs, constructed tree pits will be required.*
- *Trees proposed for front gardens shall be located within the individual house boundaries, not between dwellings.*
- *The plan shall illustrate connections between adjacent open spaces. Cross-sections are required.*
- *Cross-sections shall demonstrate how the proposed development integrates with or relates to adjoining developments and lands.*
- *Details of SuDS features are required.*
- *Landscape slopes and SuDS features must have a minimum gradient of 1:5.*
- *Each headwall must be clearly marked on the Landscape Plan.*
- *The area surrounding each headwall shall be appropriately landscaped, with screening planting encouraged.*
- *Lamp standards and service mini pillars should be avoided within open spaces. Where unavoidable, they must be surrounded by a concrete apron.*
- *A detailed Boundary Treatment Map is required.*
- *A Taking-in-Charge Map is required.*
- *Detailed plans for each playground, including boundary treatments and surface materials, must be provided.*
- *Hedging around playgrounds that obstructs passive surveillance to be avoided.*
- *Incidental landscaping should be avoided and instead integrated into private gardens.*
- *Details of surface treatments for all pathways to be provided.*

Regarding the above points:

- A minimum of 25 m separation distance has been provided between play facilities and the nearest dwellings. Please refer to drawing no. 19164-2-3138 (Play Spaces);
- A combined services and tree location drawing has been prepared; please refer to drawing no. 19164-2-3124 (Combined Services and Tree Location Plan);
- For details regarding the separation distance between proposed lamp standards and tree planting, please refer to drawing no. 19164-2-3172 (Tree Planting Strategy) prepared by CSR;
- Trees proposed for front gardens shall be located within the individual house boundaries, not between dwellings. The proposed layout reflects this strategy. For details regarding the proposed verges and planting, please refer to drawing nos. 19164-2-3101 (Landscape Masterplan) and 19164-2-3172 (Tree Planting Strategy) prepared by CSR;
- With regard to the connection between open spaces, please refer to drawing nos. 19164-2-3123 (Boundary Treatment Plan), 19164-2-3201 (Sections – Site Boundaries) and pages no. 21 and 30 of the *Landscape Submission Strategy* prepared by CSR;
- Refer to relevant DBFL engineering inputs for details on SuDS features. Please refer to drawing no. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS) for the location of SuDS features in relation to landscape layout and open spaces. In summary it is proposed to have a gradient of 1:4, which is consistent with Phase 2. No headwalls are within the Phase 3 extent;
- Please refer to drawing no. 19164-2-3101 (Landscape Masterplan), which indicates the lighting standards. Please refer to drawing no. 3260-ENX-XXXX-XX-DR-E01-006001 (Site - Services Layouts - Electrical - Public Lighting) prepared by ENX for further detailed information regarding public lighting proposals;
- Please refer to drawing no. 19164-2-3123 (Boundary Treatment Plan) for detailed information regarding the proposed boundary treatment;
- For details regarding the proposed playground, please refer to drawing nos. 19164-2-3138 (Play Spaces) and 19164-2-3139 (Play Spaces) prepared by CSR and pages no. 26-28 of the *Landscape Strategy Submission* prepared by CSR;
- For details regarding surface treatment, please refer to drawing no. 19164-2-3125 (Material Strategy) prepared by CSR; and
- The proposed development has been updated during the preparation of the Stage 3 LRD submission documentation. The updated plan seeks to retain as much existing hedgerow as possible. Please refer to the documentation prepared by John Morris Arboricultural Consultancy and drawing no. 19164-2-3120 (Vegetation Retention and Removal) prepared by CSR.

2.6.4.2 Parks and Open Space Opinion Item no. 12

“In addition to all above, the applicant is advised to refer to the Parks and Green Infrastructure Division comments in relation to the LRD0053/S1 meeting to ensure all matters raised during both pre-planning consultations are fully addressed as part of any application that may follow.”

Please refer to the *Landscape Strategy Submission* prepared by CSR for more detail relating the to the items raised and considered following the Section 247 meeting with FCC.

2.7 Transportation and Access

2.7.1 Transportation and Access: Access and Sightlines

2.7.1.1 Transportation and Access Opinion Item no. 1

“The proposed development would be accessed via a new vehicular entrance onto the ‘the Links Road’ to the west of the site; and via a new entrance onto the R126 (Donabate Distributor Road) to the east. The location of these entrances is acceptable in principle; however, the details of the vehicular entrances should be further developed and a drawing demonstrating the sightlines should be included. A dedicated drawing for the new entrance onto the Donabate Distributor Road should be considered, and confirmation that the layout complies with the ‘Cycle Design Manual’.”

Details of the proposed vehicular accesses for the scheme are provided in drawing no. 20003-DBF-XXXX-XX-DR-C01-123000 (Overall Road Layout) prepared by DBFL, and the detail for the DDR site access is provided in drawing no. 20003-DBF-XXXX-XX-DR-C01-123005., also prepared by DBFL. It is confirmed that the layout of the DDR site access junction complies with the *Cycle Design Manual*. Please refer to the *Traffic and Transportation Statement* prepared by DBFL for further information.

2.7.2 Transportation and Access: Car Parking

2.7.2.1 Transportation and Access Opinion Item no. 2

“The Fingal Development Plan 2023-2029 creates two distinct parking zones to ensure adequate residential parking provision and the control of destination car parking. This approach also allows greater flexibility in the application of car parking standards on sites in areas with varying levels of road and public transport provision. The car parking requirements for ‘Zone 1’ is maximums. The proposed development is within a 1.6km radius of the Malahide Dart Station, which would place a car parking requirement on the development of maximum 1 car parking space per 3+ bedroom unit, and 0.5 spaces per 1–2-bedroom unit; in regard to current Development Plan standards.”

The above is noted in relation to Donabate Train Station – Detail on the proposed car parking provision which is in accordance with the FCC Development Plan requirements is contained in Section 4 of the *Traffic and Transportation Assessment* prepared by DBFL.

2.7.2.2 Transportation and Access Opinion Item no. 3

“The applicant is proposing to provide the car parking provision as per the maximum permitted for ‘Zone 1’ in the current Development Plan; that is, 0.5 spaces per 1–2-bedroom unit, and 1 car parking space per 3+ bedroom unit. The proposed carparking provision appears to comply with the maximum quantity allowed in the standards of the current Development Plan.”

The above is noted, and no further response is required. Detail on the proposed car parking provision, which is in accordance with the FCC Development Plan requirements, is contained in Section 4 of the *Traffic and Transportation Assessment* prepared by DBFL.

2.7.3 Transportation and Access: Electric Vehicle (EV) Charging

2.7.3.1 Transportation and Access Opinion Item no. 4

“Section 14.17.10 of the Fingal Development Plan 2023-2029 states that all multi-unit residential developments shall incorporate EV charging points at 20% of the future fit out of a charging point at all parking spaces.”

Please refer to Section 4.4.1 of the *Traffic and Transportation Assessment* prepared by DBFL.

All of the houses will be equipped with the necessary infrastructure to enable the occupier to fit their own charge point if / when needed.

With regards to the off-curtilage parking associated with the apartment / duplex units, a review has been undertaken in relation to the optimal public charging infrastructure to be implemented for the development. The implementation of 22kW chargers rather than 7.4kW chargers as part of the proposed development has been examined and is considered to offer significant benefits in terms of energy savings, faster charging times, lower carbon emissions and a simplified infrastructure strategy. Given the higher capacity of the 22kW chargers and the aim to rationalise the public charging infrastructure to be implemented across the development, it is proposed that 6 no. 22kW chargers are provided. This equates to $\approx$ 66 no. EV users being accommodated. There are 60 no. off-curtilage spaces proposed for the apartment / duplex units plus 10 no. spaces associated with the crèche / community hall and 3 no. accessible spaces equating to a total of 73 no. spaces. Based on the development plan requirements, 20% of these spaces are required to be equipped with EV chargers equating to 15 no. spaces. With the 6 no. 22kW chargers implemented serving $\approx$ 66 EV users, this well exceeds the 20% coverage required under the Development Plan.

An additional 12 no. spaces (10 no. standard and 2 no. accessible) will be ducted to allow for the future provision of additional public EV chargers as demand increases across the development.

2.7.3.2 Transportation and Access Opinion Item no. 5

“Regarding the in-curtilage car parking spaces, the applicant states that all in-curtilage parking for the proposed houses will be equipped with the necessary infrastructure for the occupier to fit an EV charger, should they require one.”

The above is noted, and no further response is required. The EV charging strategy is discussed in Section 4.4.1 of the *Traffic and Transportation Assessment* prepared by DBFL.

2.7.3.3 Transportation and Access Opinion Item no. 6

“Regarding the 72 no. off-curtilage spaces in communal areas, the ‘Traffic and Transportation Assessment’ submitted describes that the current Development Plan requirements for 20% of parking spaces to be equipped with EV charging infrastructure, which would require 15 spaces to be fitted with EV charging infrastructure; and the Development Plan requirements have been rationalised by the applicant considering the charging capabilities of different types of chargers (AC charging versus DC fast charging). It is proposed by the applicant to provide 6 no. 22kW fast charging spaces, which exceeds the charging capacity of 15 no. spaces equipped with standard AC charging equipment. Additionally, 3 no. further spaces will be ducted for future expansion of similar EV charging provisions.”

This proposal should be further developed by the applicant, with further details of the location of these spaces provided. It is noted that the EV charging spaces would not be considered to be part of the residential parking provision, and there is a preference for the car parking provision to be slightly increased to address this. If necessary, the applicant is advised to engage with the Council’s Taking in Charge Section for any technical discussion required on the Council’s taking in charge requirements, who can be reached at ticestates@fingal.ie.”

The proposed approach with regards to the EV charging strategy has been outlined in response to Item 4 (please refer to **Section 2.7.3.1**) and also discussed further in Section 4.4.1 of the *Traffic and Transportation Assessment* prepared by DBFL. Locations of the proposed EV spaces are shown on drawing no. 20003-DBF-XXXX-XX-DR-C01-123010 (Parking Allocation Plan) also prepared by DBFL.

2.7.4 Transportation and Access: Motorcycle Parking

2.7.4.1 Transportation and Access Opinion Item no. 7

“Motorcycle parking should be provided on the basis of one motorcycle parking bay per 10 no. car parking spaces provided for apartment developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be

provided to facilitate access to motorcycle parking bays. Fixed and robust features such as rails, hoops or posts should be provided to secure a motorcycle using a chain or similar device.

The applicant is proposing 6 no. motorcycle spaces, which is 10% of the non-residential car parking spaces, and the Transportation Planning Section has no objection to this."

Full details regarding the locations of the motorcycle bays are provided in drawing no. 20003-DBF-XXXX-XX-DR-C01-123000 prepared by DBFL. The motorcycle parking strategy is also discussed in Section 4.3 of the *Traffic and Transportation Assessment* prepared by DBFL. In summary, it is proposed to provide 6 no. motorcycle spaces, distributed across the site in close proximity to their associated apartment / duplex blocks.

2.7.5 Transportation and Access: Accessible Parking

2.7.5.1 Transportation and Access Opinion Item no. 8

"Accessible parking is being proposed at a rate of 5% of the off-curtilage parking (for apartments and duplexes); and this is acceptable to the Transportation Planning Section."

The above is noted, and no further response is required. 60 no. off-curtilage spaces are proposed for the apartment / duplex units plus 5 no. staff spaces associated with the crèche / community hall. A total of 3 no. accessible spaces is proposed, representing 5% of the off-curtilage parking. The accessible parking strategy is discussed further in Section 4.4.1 of the *Traffic and Transportation Assessment* prepared by DBFL.

2.7.6 Transportation and Access: Crèche Parking and Drop Off

2.7.6.1 Transportation and Access Opinion Item no. 9

"The layout of the proposed creche appears to have 4 rooms. The applicant states in the 'architectural design statement' that car parking would be provided at a rate of 0.5 spaces per classroom with additional drop off / set down in accordance with current Development Plan standards."

The above is noted, and no further response is required. The proposed parking strategy in relation to the crèche and community hall facility is discussed in Section 4.4.1 of the *Traffic and Transportation Assessment* prepared by DBFL.

2.7.6.2 Transportation and Access Opinion Item no. 10

"The details of the location and quantity of car parking does not appear to have been clearly set out in the submission; and this should be addressed. The applicant should consider the following items:

- *Drop off and parking should be appropriately located and designed to ensure three-point turns are not required near the entrance to the creche, and a circuitous route could be considered if appropriate.*
- *Parallel spaces on the same side of the street as the creche are generally preferable.*
- *Appropriate size of spaces should be considered to allow for safe exit from the car and use of child seats etc.*
- *There should be control measures in place by way of signage and lining to reserve the creche set down and staff parking for the exclusive use of the creche during creche operating hours. Spaces could revert to visitor spaces outside of operational hours."*

The 5 no. drop-off spaces for the proposed creche are parallel and located on same side of the road as the creche, as shown in **Figure 2-1**, thereby enabling parents / caregivers to pull up beside the crèche, to safely access their car to get children out onto the footpath and they can then use the internal road network of the development to conveniently turn around without having to undertake three point turns on the road. These spaces will be clearly marked and signed as drop off spaces for the crèche facility.

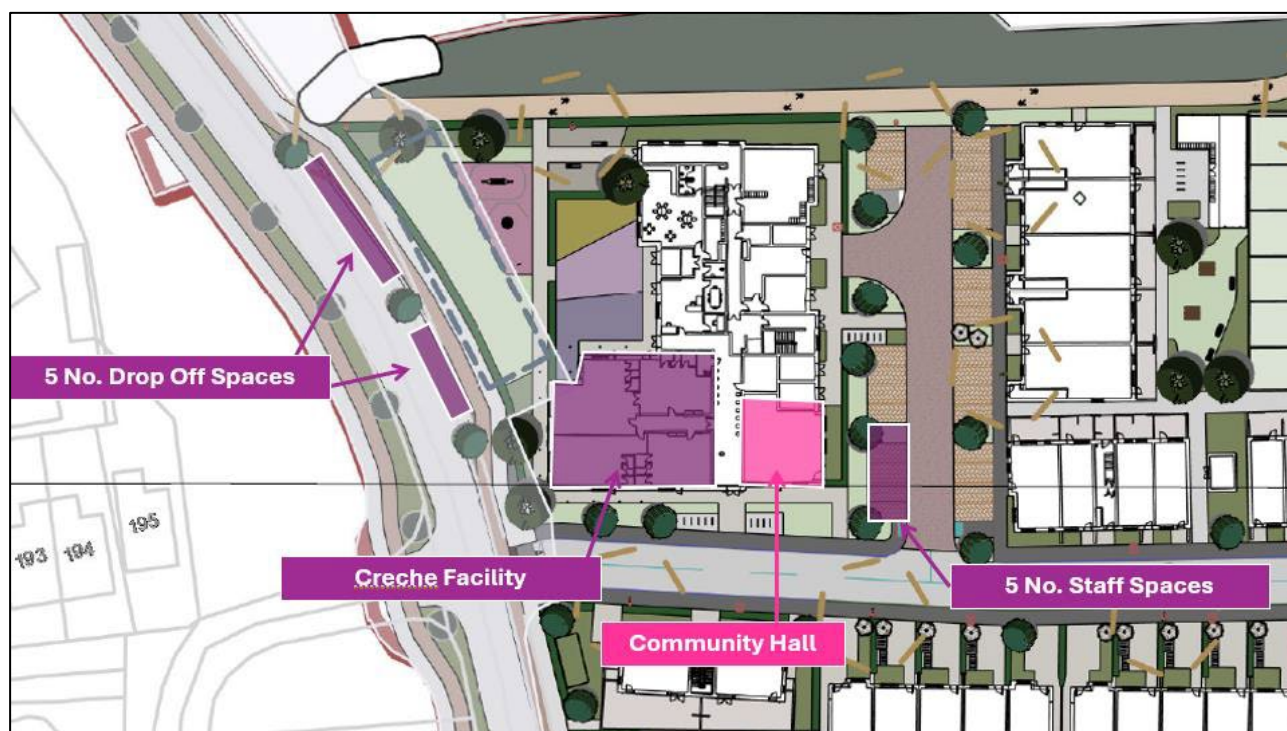


Figure 2-1: Proposed car parking provision for crèche and community hall facilities (extract from Traffic and Transportation Assessment prepared by DBFL)

There are also 5 no. staff spaces provided to the eastern side of the crèche facility. It is proposed that both the drop-off and staff spaces (i.e. 10 no. spaces) will be dual function and also serve the proposed Community Hall facility. Events and activities in the Community Hall are expected to generally occur outside of the opening times of the crèche. Therefore, in order to avoid an oversupply of car parking, it is proposed that these 10 no. spaces will serve both uses given they are located in close proximity to each other.

2.7.7 Transportation and Access: Bicycle Parking

2.7.7.1 Transportation and Access Opinion Item no. 11

“Mid Terrace Units: Mid-terrace houses are proposed to include a combined bin / bicycle storage structure incorporated into the front curtilage of the unit, which is acceptable.”

The above is noted, and no further response is required. Combined bin/bike stores will be provided in the front curtilage of the mid-terraced units. Further detail regarding the sizing, layout and location of these can be found in the Frontage Typology Drawings (drawing nos. 19164-2-3141 / 3142), prepared by CSR.

2.7.7.2 Transportation and Access Opinion Item no. 12

“Apartment Blocks: Regarding the apartment units, the applicant is proposing to provide ‘long stay’ bicycle parking at the minimum rate described in the standards of the current Development Plan, which is 1 space per unit plus one space per bedroom; and also 0.5 visitor spaces per unit; and this quantity is acceptable in principle to the Transportation Planning Section. The location and layout of the bike parking stores, as presented on page 20 of the submitted ‘Architectural Design Statement’ is generally acceptable, however the full layout and detail should be further developed and presented for each apartment block and consideration should be given to the details described in the standards of the current Development Plan, the ‘Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities’ (2024) and the ‘Cycle Design Manual’; as described in further detail in the next section below titled Cycle Storage.”

The full design details of the location and layout of each of the long-term bicycle stores are provided in drawing no. 23010-MDO-BX16-XX-DR-A01-070001-Block BX16 / Block BX24, prepared by MDO.

2.7.7.3 Transportation and Access Opinion Item no. 13

“Duplex Blocks: The applicant is proposing that the residential (long stay) cycle parking spaces for the duplex units will be provided in external stores. The applicant has provided the locations, which are generally acceptable in principle; however, the layout and details have not been provided and should be further developed.”

The full design details of the location and layout of each of the long-term bicycle stores are provided in drawing no. 23010-MDO-BX16-XX-DR-A01-070001-Block BX16 / Block BX24, prepared by MDO, which relate to the duplex units.

2.7.8 Transportation and Access: Cycle Storage

2.7.8.1 Transportation and Access Opinion Item no. 14

“The proposed bicycle parking provision is generally acceptable in terms of quantity and general location; however additional design solutions should be considered and incorporated where possible, as described below:

- *Additional design details should be considered to address the needs of heavier bikes, lockers, E-bike charging and cargo bikes.*
- *Communal storage rooms should be designed so that they are universally accessible for cycle parking – see NTA cycle manual dimensions and details. As follows:*
 - o *The design should address that heavier bikes are not always suitable for two tier.*
 - o *Repair stations for bike equipment should be considered.*
 - o *A quantity of Individual bike-lockers should be considered.*
 - o *The operators of the apartment management should provide a cycle parking management plan and include a maintenance regime for the parking facilities to be maintained.*

Further detail for each of the bicycle stores, including layout and quantum of bicycle space in each store together with a full schedule, is provided in the *Architectural Design Statement* prepared by MDO, and in the accompanying architectural drawings. The bicycle stores will provide double tier bike racks, with accessible/cargo bike parking provided at a rate of 5% of the overall quantum of cycle parking.

The external bicycle stores will comprise lightweight, visually appealing structures, designed to provide a covered, secure parking facility whilst not dominating the streetscape or open space areas. With regards to the requirement for providing storage facilities for cyclists’ equipment, the bicycle stores will incorporate small lockers, at the rate of 1 no. locker per bike parking space, similar to that shown in **Figure 2-2** below. Further detail on the design of the bicycle stores and locker facilities can be found in the *Architectural Design Statement* prepared by MDO.

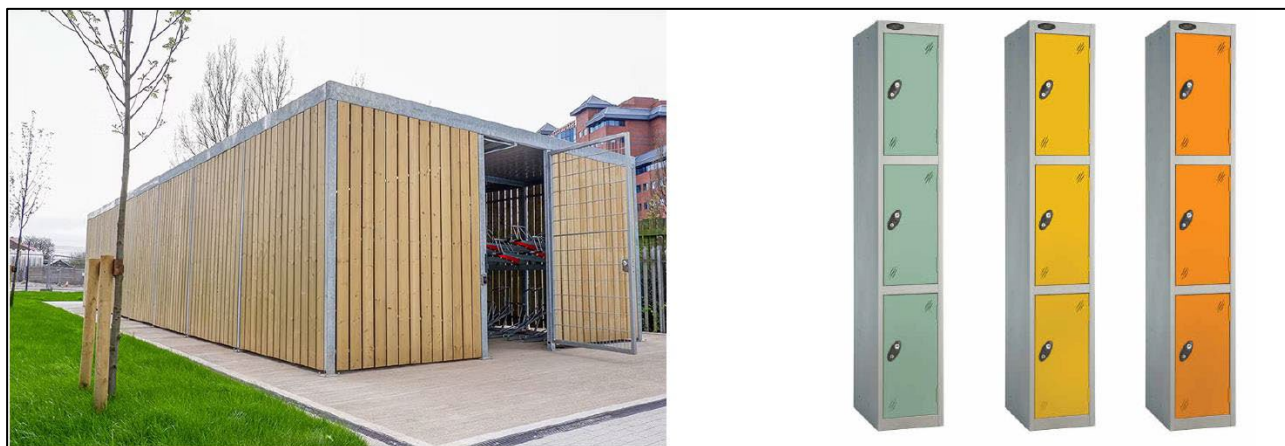


Figure 2-2: Example of Proposed External Bicycle Store and Locker Provision (extract from Traffic and Transportation Assessment prepared by DBFL)

2.7.8.2 Transportation and Access Opinion Item no. 15

"Section 14.17.2.1 of the current Development Plan deals with bicycle parking standards for residential development and describes the following:

- *The quality and quantity of bicycle parking provision in residential developments should encourage residents to adopt cycling as the preferred mode of travel for short trips.*
- *Cycle parking should be provided within the curtilage or adjacent to the building and should not require the bike to be brought through an internal area.*
- *Innovative, secure, covered and front of house bicycle parking solutions are required in the design of all new duplex developments and terrace dwellings. Wall bars or rings are not acceptable at the front of a house for long stay bicycle parking. Applications for front of house bicycle parking solutions in existing housing and residential areas and matching these criteria will be supported and encouraged.*
- *In exceptional circumstances, where cycle parking cannot be provided within the curtilage, bicycle parking that is innovative in design, secure and sheltered must be provided adjacent to the building. Communal on-street bicycle parking provision provides an opportunity in the context of retro-fitting existing terrace dwellings fronting onto streets in existing built-up area and this will form part of the Active Travel Strategy.*
- *Apartment development must be comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.*
- *The provision of high-quality bicycle parking is a key concern for apartment residents and apartment proposals must respond accordingly in their design and provision of such facilities.*
- *Each apartment unit shall be provided with an individual storage compartment for long stay bicycle provision that is capable of accommodating bicycles, buggies and additional ancillary equipment such as scooters, helmets and bicycle maintenance equipment.*
- *Guidance in relation to bicycle parking provision and storage for apartment developments is outlined in the 'Planning Design Standards for Apartments - Guidelines for Planning Authorities' (2025). The Council will have regard to these relevant guidelines when considering applications for apartment development where bicycle parking is a requirement.*
- *Section 14.17.2 of the Fingal Development Plan 2023-2029 describes 'long-stay' bicycle parking in the following terms: These are to be designed for private use by residents and employees. Such cycle parking spaces should be located in a secure area that is easy to access, well-lit and covered. Effective security and functionality for all types of users is also maximised by the provision of individual facilities to allow for*

different types of equipment such as buggies, cargo bikes, helmets and scooters to be stored where appropriate. They should be situated within the curtilage of the destination.

Apartment / Duplex Units Bicycle Parking

Long-stay bicycle parking for the apartment and duplex blocks is provided in the form of internal and external bicycle stores. The locations of these bike stores are driven by the need to provide secure, safe and accessible bicycle storage to the residential blocks that they serve. With regard to the requirement for providing storage facilities for cyclists' equipment, the cycle stores will incorporate small lockers, at the rate of 1 no. locker per bicycle parking space as per the approach previously taken and approved for Phases 1 and 2 of the wider Ballymastone development. Further detail on the design of the bicycle stores and locker facilities can be found in *Architectural Design Statement* prepared by MDO. Full design details of each of the long-term bicycle stores are provided in architectural drawing pack prepared by MDO. This includes detailed floor plans for each of the proposed bicycle stores.

Mid-Terrace Units Bicycle Parking

For the residents of the mid-terraced house units, a combined bin/bicycle storage unit has been incorporated into the front curtilage space of the mid-terrace units. This is in recognition of the difficulty often encountered by occupants or visitors of mid-terraced units with regards to accessing the rear garden areas to store bicycles, which requires bringing the bicycle through the house. The bike stores provided within the front curtilage of the 3-bed units will be capable of accommodating 5 no. bicycles and the 2-bed units will be capable of accommodating 3 no. bicycles in line with the Development Plan requirements. They will facilitate secure, covered, convenient storage of bicycles for the residents of the mid-terrace units. Further detail on the proposed layout of the in-curtilage bin/bicycle stores can be found architectural drawing pack prepared by MDO and the landscape design drawing pack prepared by CSR.

The bicycle parking proposed is of a high-quality, provides sufficient storage and is designed so as to make it easy, safe and convenient for people to store bicycles, thereby encouraging an uptake in cycling.

2.7.9 Transportation and Access: Boundary Treatments

2.7.9.1 Transportation and Access Opinion Item no. 16

"Detailed boundary treatment proposals between the development and the adjacent public roads and residential streets should be provided. The applicant should take cognisance of the following objectives in regard to permeability:

- *The Fingal Development Plan 2023-2029 Objective CIO501 – Permeability - Ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation with residents.*
- *Fingal Development Plan 2023-2029 Objective DMSO49 – Permeable and Accessible Open Spaces- Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.*
- *The Transport Strategy for the Greater Dublin Area 2016-2035 sets out Principles of Land Use and Transport Integration. At the local level, the principles state: New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to a give competitive advantage to these modes; and, where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips.*
- *The 'NTA's Permeability Best Practice Guide', also outlines the importance of permeability.*

The proposed development has been designed to maximise permeability for pedestrians and cyclists, ensuring convenient connections to adjacent public roads such as The Links and the DDR. Boundary treatments with adjacent existing residential areas such as The Priory and Priory Wood have been designed so as not to prohibit the delivery of future additional pedestrian links, to be delivered by FCC as and when required. Details of the proposed boundary treatments for the subject development can be found in drawing No. 19164-2-3123 (Boundary Treatment Plan) prepared by CSR. An indicative location for a potential cycle/pedestrian connection to Priory Wood is shown on page 20 of the *Landscape Strategy Submission* prepared by CSR.

2.7.10 Transportation and Access: Connectivity and Permeability

2.7.10.1 Transportation and Access Opinion Item no. 17

“The site location offers good opportunity for permeability into all surrounding streets and residential developments, and this should be further developed by the applicant and preferably a dedicated drawing provided to demonstrate permeability through the development should be submitted.”

There are several pedestrian/cyclist access points located along the DDR offering excellent levels of connectivity to/from the pedestrian and cycle facilities along the DDR as well as connections eastwards to the permitted Recreational Hub development via the upgraded DDR junction being delivered as part of the Phase 1 development.

As shown in **Figure 2-3**, there will be connectivity westwards to Donabate village via The Links and the permitted Phase 1 development which will provide linkages to key services in the village as well as Donabate Train Station.

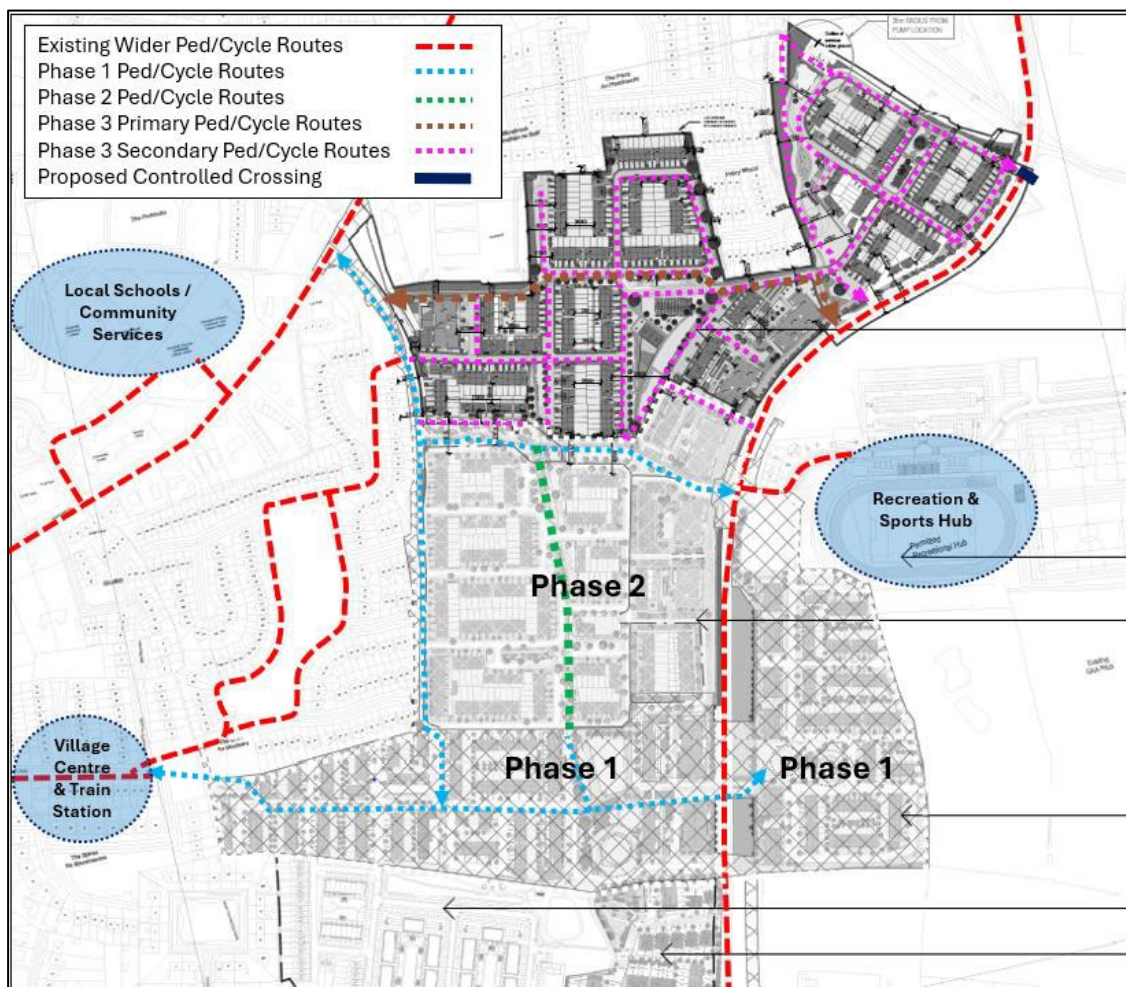


Figure 2-3: Proposed Pedestrian/Cycle Connections (extract from the Traffic and Transportation Assessment prepared by DBFL)

2.7.11 Transportation and Access: Internal Layout

2.7.11.1 Transportation and Access Opinion Item no. 18

“Roads hierarchy: The applicant has provided a ‘roads hierarchy drawing’. We recommend that the various widths of roads are detailed on the drawings, and a rationale provided.”

Road hierarchy details are provided in drawing no. 20003-DBF-XXXX-XX-DR-C01-123004 prepared by DBFL, and the widths/cross sections of each of the different street types are contained in drawing nos. 20003-DBF-XXXX-XX-DR-C01-523001 to 523005, also prepared by DBFL. The rationale for the various road widths and proposed road hierarchy is contained within the *DMURS Design Statement* prepared by DBFL submitted as part of the planning application.

2.7.11.2 Transportation and Access Opinion Item no. 19

“Roads Line Marking and Signage: A road line marking and signage drawing should be provided, and a statement that it complies with the Traffic Signs Manual submitted.”

The required details are provided in drawing no. 20003-DBF-XXXX-XX-DR-C01-123004 prepared by DBFL and have been developed in accordance with the requirements of the Traffic Signs Manual.

2.7.11.3 Transportation and Access Opinion Item no. 20

“Kerb Levels: A drawing detailing the kerb levels of the footpath should be provided; detailing the levels of footpaths and kerbs relative to the road carriageway.”

Proposed kerb heights relative to the road carriageway are shown on drawing nos. 20003-DBF-XXXX-XX-DR-C01-123010 to 123032 prepared by DBFL.

2.7.11.4 Transportation and Access Opinion Item no. 21

“Tactile Paving and Crossings: The proposed locations for pedestrian crossings points with tactile paving should be detailed, and a rationale for where they are located with reference to the guidance provided in the ‘Traffic Management Guidelines’ submitted.”

The use of tactile paving has been applied throughout in accordance with the guidance contained within the Traffic Management Guidelines (2003) and the UK Guidance on the use of Tactile Paving Surfaces to ensure a logical and navigable pedestrian environment is delivered for those with visual impairments.

Well-designed pedestrian crossing facilities are provided at frequent intervals along key travel desire lines throughout the scheme in addition to those located at street nodes. All courtesy crossings are provided with either dropped kerbs or a raised flat top / continuous footpath treatment thereby allowing pedestrians to informally assert a degree of priority. All informal pedestrian crossing facilities are at least 2.0m wide. The locations and types of tactile paving are shown on drawing no. 20003-DBF-XXXX-XX-DR-C01-123000 prepared by DBFL. Additional detail with regards to the rationale for the location of pedestrian crossing facilities are contained within the *DMURS Design Statement* prepared by DBFL submitted as part of the planning application.

2.7.11.5 Transportation and Access Opinion Item no. 22

“Road Safety Audit: A Stage 1 (or possibly a stage 2 if appropriate) Road Safety Audit should be submitted by the applicant as part of the final submission.”

A Stage 1 Road Safety Audit has been undertaken by an independent road safety audit team who has not been involved in any of the design aspects of the project. The *Stage 1 Road Safety Audit* is submitted by DBFL as part of the planning documentation.

2.7.11.6 Transportation and Access Opinion Item no. 23

“Swept Path Analysis: Access for fire tender and bin collection should be considered, as described further below.”

Vehicle tracking for refuse collection vehicles and fire tender are provided in drawing nos. 240058-DBF-XXXX-XX-SK-C01-123001 -123002 prepared by DBFL.

2.7.11.7 Transportation and Access Opinion Item no. 24

“Home zones: The exact proposed surface details of the shared surface should be provided, with a rationale for how it complies with DMURS. DMURS describes (Section 4.3.4) that the key condition for the design of any shared surface is that drivers, upon entering the street, recognise that they are in a shared space and react by driving very slowly (i.e. 20km/h or less). To ensure this, designers should use a variety of materials and finishes that indicate that the carriageway is an extension of the pedestrian domain. DMURS also allows for the use of Verges that act as refuge zones allowing pedestrians to step on and off the carriageway to let cars pass. DMURS also describes that the total carriageway width on Local Streets where a shared surface is provided should not exceed 4.8m.”

Specific design features that have been incorporated within the proposed residential scheme with the objective of delivering a design that is consistent with both the principles and guidance outlined within *the Design Manual for Urban Roads and Streets* (DMURS) (Version 1.1, 2019).

DMURS states designers should use *“contrasting materials and textures to inform pedestrians of changes to the function of space (i.e. to demarcate verges, footway, strips, cycle paths and driveways) and in particular to guide the visually impaired”*.

It is proposed to use a coloured asphalt surface treatment on the Homezone areas. The shared surface areas will be differentiated from local streets through contrasting colour surfacing.

DMURS notes that designers should use discretion with regard to the self-regulating characteristics of streets and the impact of signs / line marking on the value of place.

In recognition of the low-speed nature and low movement function of the Homezones, the proposed design has sought to specify minimal signage and line markings along the internal streets with such treatments used sensitively throughout.

There is a *DMURS Design Statement* with regards to the proposed Phase 3 Residential Development provided in DBFL Report 20003-DBF-XXXX-XX-RP-C01-000105 *DMURS Design Statement*.

2.7.12 Transportation and Access: Access for Emergency Service Vehicles**2.7.12.1 Transportation and Access Opinion Item no. 25**

“The applicant should confirm that access for firefighting operations has been considered in regard to Building Regulations Technical Guidance Document B. The applicant should consider that for some larger sizes of multi-storey buildings (defined in Part B of the Building Regulations) the Turntable Ladder (TTL) is required. This is 11.6m in length.”

Access for fire tender has been considered and facilitated and vehicle tracking for fire tender are provided in drawing no. 240058-DBF-XXXX-XX-SK-C01-123001 -123002 prepared by DBFL.

2.7.13 Transportation and Access: Access for Bin Collection Vehicles**2.7.13.1 Transportation and Access Opinion Item no. 26**

“The applicant should confirm that the proposed street layout can accommodate the access requirements for a refuse collection vehicle, with consideration given for the 11.2m long refuse collection vehicle.”

Vehicle tracking for refuse collection vehicles are provided in drawing no. 240058-DBF-XXXX-XX-SK-C01-123001 - 123002 prepared by DBFL.

2.7.14 Transportation and Access: Traffic and Transport Assessment

2.7.14.1 Transportation and Access Opinion Item no. 27

"A Traffic and Transportation Assessment has been provided by the applicant, and the Transportation has generally no objection to the methodology and approach taken to the assessment."

The above is noted, and no further response is required. Please refer to *Traffic and Transportation Assessment* prepared by DBFL.

2.7.1 Transportation and Access: Taking in Charge

2.7.1.1 Transportation and Access Opinion Item no. 28

"A taking-in-charge drawing should be provided detailing all areas proposed to be taken in charge by the Council. The applicant is advised to further consider the following points:

- *The Council's Taking in Charge Policy/Specification, Appendix 6 Section 8, states the following: 'All roads to be taken in charge will be taken in charge at a minimum from the back of footpath/cyclepath on one side of the road to the back of footpath/cyclepath on the other side of the road in line with the definition of a road in the 1993 Roads Act Part 1 Section 2(1).' The consequence of this is that the Council's taking in charge policy, by default, requires all 'non in-curtilage carparking / on-street car parking spaces' located on or directly adjacent to streets / roads proposed to be taken in charge by the Council to not be designated to any particular unit and to become public car parking spaces, unless otherwise agreed with the Council's Taking-In-Charge Section.*
- *All areas that are proposed to be 'taken in charge' by the Council, should be constructed and maintained to the Council's standards for taking in charge, including roads, footpaths, verges, public lighting, open space, sewers, watermains or drains, forming part of the development.*
- *Public infrastructure such as stormwater drainage and streetlighting, should be located in areas to be taken-in-charge by the Council.*

If necessary, the applicant is advised to engage with the Council's Taking in Charge Section for any technical discussion required on the Council's taking in charge requirements, who can be reached at ticestates@fingal.ie."

The Taken-in-Charge plan can be found in MDO's Architectural Drawing Pack (drawing no. 23010-MDO-PZ4X-XX-DR-A01-054304 and 23010-MDO-ZZZZ-XX-DR-A01-054305).

2.7.2 Transportation and Access: Road Safety Audit

2.7.2.1 Transportation and Access Opinion Item no. 29

"Any application that may be forthcoming should be accompanied by a Road Safety Audit. It is important that the Road Safety Audit process is built into the early stages of the Planning Procedure to allow the Local Authority to give due consideration to the potential road safety risks associated with a development prior to the award of planning consent, and prior to the commencement of construction work. A Stage 1 (or possibly a Stage 2 if appropriate) Road Safety Audit should be submitted by the Applicant as part of the final submission."

A Stage 1 Road Safety Audit has been undertaken by an audit team independent of the design team and is submitted as part of the planning documentation, prepared by DBFL.

2.7.3 Transportation and Access: Construction Management Plan

2.7.3.1 Transportation and Access Opinion Item no. 30

“A final Construction Traffic Management Plan will need to be agreed with the Planning Authority prior to construction of the proposed development. The Plan should include the construction phasing of development and haul routes.”

A Construction Traffic Management Plan will be completed and be agreed with Fingal County Council prior to the commencement of construction activities on site. A *Preliminary Construction & Environmental Management Plan* has been prepared by DBFL and submitted as part of the subject planning application pack.

3 CONCLUSION

In conclusion, it is respectfully submitted that the proposed application has addressed the issues raised by FCC at LRD Opinion stage and that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.



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