LARGE SCALE RESIDENTIAL DEVELOPMENT – LRD APPLICATION LRD6098/25-S3

RESPONSE TO LRD OPINION

FOR ZONES 7, 8 & 9 AT LANDS AT CLONGRIFFIN, DUBLIN 13

BSM Est. 1968 Brady Shipman Martin Built. Environment.

Place Making **Built Environment**

Client
The Land Development Agency

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1. INTRODUCTION

This Response to LRD Opinion has been prepared in support of a Large-Scale Residential Development (LRD) Stage 3 Application to Dublin City Council (DCC), on behalf of The Land Development Agency (the 'applicant'). The subject application site (hereafter called 'the site') is located along Clongriffin Road in north Dublin, within the Clongriffin - Belmayne area. It forms part of the wider Clongriffin–Belmayne Strategic Development and Regeneration Area (SDRA) and is situated in close proximity to Clongriffin DART Station.

2. RESPONSE TO DUBLIN CITY COUNCIL

In its Opinion of 9th February 2026, DCC determined that:

> *Following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the 2021 Act, requires further consideration and amendment to constitute a reasonable basis for an application for Large-scale Residential Development.*

Additionally, the Opinion noted that:

> *"In the event that the applicant proceeds to submit a planning application, the applicant is advised that the LRD application should be accompanied in the first instance by:*
>
> - *Statement of response to the issues set out in the LRD opinion.*
> - *Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area.*
>
> *Furthermore, in accordance with Section 32D (a) and (b) of the LRD Act, the applicant is hereby notified that the documents submitted in relation to the following issues did not constitute a reasonable basis on which to make an application. The applicant is advised that these issues or areas must be addressed in any documents submitted in a future planning application, in order to constitute a reasonable basis on which to make an application.*

This response report addresses the matters raised by DCC in the LRD Opinion issued.

2.1. PLANNING OPINION

1. ***Objective CUO25: The current proposal shall provide 50% of the required CUO25 provision attributable to this phase of development within Blocks 7, 8, & 9 and the remaining 50% shall be allocated elsewhere within the Clongriffin area. It is considered that the proposal for community, cultural and arts spaces requires further consideration to comply with Objective CUO25 of the Dublin City Development Plan 2022 - 2028. While it is considered that the provision of community and cultural space meets the quantum of space required to satisfy CUO25 the quality of same requires further consideration. The proposed external community spaces located in zone 7 (290m2) and in zone 9 (112m2) of the development are unacceptable. External space must be functional, meaningful and complementary to a principal internal or external community facility. The majority of spaces proposed for community use are poorly designed and overly restrictive for future use. They have not been designed with future use in mind. The future uses are compromised by columns, poor natural light and ceiling heights. Dublin City Council's Cultural Toolkit provides good guidelines for minimum requirements for cultural use. All CUO25 community and cultural accommodation shall be fully fitted out and suitable for immediate occupation at the time of first tenanting of the development. Further consideration of the spaces are required and this shall be done in consultation with the Manager for the North Fringe Project Office and Dublin City Council's Arts Office prior to the lodgement of the Stage 3 application.***

As set out in the Planning Report, the Architect's Design Statement & the Community, Social & Cultural Infrastructure Report the proposed provision of CUO25 space has been amended from LRD Opinion stage as per the requirements of Dublin City Council above.

The total amount of community, arts and cultural space provided (c. 1,328 sq.m) equates to a total of c. 3% of the overall net residential floor area (c. 43,982 sq.m) based upon the requirement of DCC in the LRD Opinion to *'provide 50% of the required CUO25 provision attributable to this phase of development within Blocks 7, 8, & 9 and the remaining 50% shall be allocated elsewhere within the Clongriffin area'.* The LDA has engaged with the Planning Department, and the North Fringe Project Office, and will continue to work with DCC with regards to this and future CUO25 spaces.

All external spaces previously proposed have been removed from the scheme. The design of the internal CU025 spaces has been reviewed in line with the Cultural Toolkit, with column positions adjusted to allow greater flexibility in the use of these units.

2. ***Daylight and Sunlight Results and Compensatory Measures Proposed: The language used for impact classification should reflect Section 5.0 Assessment Methodologies of Appendix 16 Sunlight and Daylight within the Dublin City Development Plan 2022-2028. Clear identification of all affected properties required***

The Daylight, Sunlight prepared by OCSC has been amended to reflect the requirements of the Development Plan. Any units falling below the relevant standards have been identified and as per Item 3 below have been reviewed with compensatory measures set out.

3. ***Clearly identify the compensatory measures proposed for units failing daylight/sunlight***

Any units falling below the relevant standards have been identified and have been reviewed with compensatory measures set out. These range to the units being larger in size than minimum standards, having larger private amenity space and in some instances units which were previously failing have been reorganised to improve results. This is set out in Section 5 of the Daylight, Sunlight & Overshadowing Assessment within each section of the results.

4. It is noted that 4.80% of the scheme's residential units are proposed as north facing single-aspect units. This unit configuration will only be considered acceptable in limited circumstances on a case-by-case basis subject to built-in compensatory measures for the specific units . Compensatory measures shall be clearly identified

As set out in the Planning Report, the proposed development includes for c. 4.64% single aspect north facing units, which equates to 33 units out of a total of 711 units. This is primarily as a result of the orientation of the blocks along the continued Market Street, the provision of which is set out in the SDRA Objectives. The orientation of Market St and the requirement to provide frontage to the street dictates the provision of a level of north facing single aspect units. All the north facing units are overlooking market street which is a pedestrianised green link with lush planting and street furniture which will encourage social interaction, relaxation, and community gatherings.

As detailed in the Architectural Design Statement, in Section 3.3, to mitigate the limitations associated with north-facing single-aspect apartments, the proposal incorporates a comprehensive package of compensatory measures to safeguard residential amenity and public realm quality.

A range of design responses have been applied:

- affected units have been increased in size where necessary to improve internal layouts and daylight distribution;
- window openings and sill heights have been optimised to maximise diffuse daylight; and enlarged, partly sheltered balconies provide usable private outdoor space.
- The Market Street frontage is designed as an active, landscaped pedestrian and cyclist route, prioritising greenery and seating and excluding through-traffic to improve outlook, air quality and acoustic comfort.
- High-performance glazing, targeted solar control and appropriate ventilation strategies are specified to maintain thermal comfort year-round.

5. The proposal lands are located within the Dublin Airport Noise Zone. Development shall take account of the Dublin Airport Local Area Plan (2020) and Noise Action Plan for Dublin Airport 2019-2023. The applicant is required to demonstrate good acoustic design has been incorporated into the scheme to mitigate against any potential noise impacts

Chapter 13 of the Environmental Impact Assessment Report, which addresses Noise & Vibration has assessed any potential impact on the scheme in respect of noise due to the site's location within the Dublin Airport Noise Zone. It considers that 'All habitable rooms will achieve a good internal noise environment with enhanced acoustic glazing and ventilation installed. External amenity areas are measured to be slightly over the guidance noise thresholds due to the contribution from aircraft noise. It is not considered possible to mitigate this further and the increase over the threshold is considered imperceptible'.

6. An assessment of the microclimatic impacts including wind shall be submitted with the application

Chapter 17 of the Environmental Impact Assessment Report, which addresses Microclimate- Wind has assessed the microclimatic impacts of wind on the scheme. Additionally, Chapter 17 of the EIAR and the standalone Daylight, Sunlight & Overshadowing Assessment both prepared by OCSC has considered microclimatic impacts of daylight and sunlight.

7. Inconsistencies within the pack - mislabelling on HQA Units at blocks 8 and 9

All inconsistencies have been reviewed and corrected by Henry J Lyons.

8. The creche stated as 800sqm however, shown on drawings as 870sqm. Also, the play area stated differently on drawing vs documentation

All inconsistencies have been reviewed and corrected by Henry J Lyons. The proposed childcare facility has an overall gross floor area of c. 895 sq.m. The childcare facility has a secure outdoor play area of 509 sq.m overlooking Market Street and Clongriffin Road.

9. Calculation for 5% community and cultural space not apparent. Spaces stated differently on drawing vs documentation

All inconsistencies have been reviewed and corrected by Henry J Lyons. Two no. spaces have been provided within Zones 7 & 8 as follows:

Community, Cultural & Social Spaces	Community, Cultural & Social Spaces
Internal Space	**Internal Space**
Zone 7 – Community/ Social / Cultural/ Arts 1	Zone 7 – Community/ Social / Cultural/ Arts 1
Zone 8– Community/ Social / Cultural/ Arts 2	Zone 8– Community/ Social / Cultural/ Arts 2

This is set out in more detail in Section 6.8 of the Planning Report, Section 2.3 of the Architects Design Statement and in the Community, Social & Cultural Infrastructure Report.

10. AA Screening Report: Source- Receptor- Pathway model to be used (rather than 15km radius); all sites within a 15km do not have to be included (if applicant wishes to include them put them into an Appendix)

The AA Screening Report is based on the source-pathway-receptor model. It assesses all European sites within the zone of influence, and the report confirms that a notional 15km radius is not used in the assessment. Nevertheless, the report has been edited to clarify the methodology used to define the zone of influence.

11. Findings of AA Screening- wording should use the exact wording of the Directive itself and reflect the requirements of the Directive

Appropriate language to describe the findings is included in the submitted AA Screening Report.

12. An Environmental Impact Assessment Report is required to accompany the application

An Environmental Impact Assessment Report has been prepared and accompanies the application.

2.2. DRAINAGE ISSUES

The applicant is advised that the following points be addressed within the final LRD application documentation:

1. The overall proposed approach to the surface water management, which includes, green & blue roofs (at podium level), permeable paving, bioretention areas, tree pits is acceptable. There is a general restriction against the use of underground attenuation tank; the small attenuation tank proposed adjacent the creche may be acceptable once all alternatives have been explored. Surface water runoff is limited to greenfield runoff rate of 4.61/s/ha, and attenuation storage provided within the building plots for the 100 yr event + climate change factor which is acceptable.

The above opinion item is noted. Efforts have been made to reduce the provision of attenuation tanks and provide underground tanks only when necessary. The primary strategy employed for the overall development site is blue

roofs and attenuation at source. However, the design of the creche building means that provision of a green blue roof is not feasible. SuDS devices have been provided in the vicinity of the creche building to intercept and treat surface water runoff, however, it has been found that a small attenuation tank is still required in this location to ensure that surface water is dealt with at source and that an appropriate attenuated flow is released to the wider surface water system. An attenuation tank with a storage volume of 34m3 has been provided to serve the proposed creche area.

2. Interception storage of 5mm should be calculated and provided for each sub catchment within the development lands, rather than a single figure for the overall site area.

The proposed development has been divided into several micro-catchments in accordance with Dublin City Council's LRD Opinion item above. Interceptor storage has been calculated for each micro-catchment, with the corresponding results and catchment areas presented in the Engineering Report.

3. A further refinement of the design of Suds devices such as permeable paving and SuDS tree pits proposed in the public area is required. The applicant is advised to consult with the planning authority's drainage in advance of the application being lodged to agree on the design

CS Consulting met with representatives of Dublin City Council on Friday the 27th March 2026 regarding issues regarding Taking in Charge of drainage infrastructure. Permeable paving has been proposed to the development's car parking spaces and SuDS tree pits have been incorporated in the design. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0104.

4. The applicant has confirmed an additional body of work is being undertaken on the existing attenuation pond and flood risk. The Site-Specific Flood Risk Assessment should be updated with the findings, and any necessary mitigation measures identified

A further topographical and bathymetric survey has been carried out by Murphy Geospatial in relation to the existing attenuation pond to the north of the site – the primary purpose of this study is to determine the available storage volume within the existing infrastructure which can serve the infrastructure on the development site and wider masterplan area. There have been no updates to the Site-Specific Flood Risk Assessment on account of the additional surveyed information. The revised bathymetric survey has confirmed that the attenuation pond has a dry weather capacity of 1,181.63m3 with a storage capacity of 2,245.62m3 (allowing for a suitable free board of 0.5m).

5. There's a discrepancy in the drawings showing the extent of areas to be taken in charge by DCC. The cul de sac road between Zone 8 and 9 on the architects taking in charge layout shows that road to be taken in charge by DCC. Whereas the engineering drawings show that road left out of the taking in charge extents. This will need to be clarified. From the drainage point of view, there are sewers running under this road that will have to be taken in charge in future, as they are downstream of other sewers on Clongriffin Main St. Also, the architect drawing shows private parking spaces within the taking in charge extents. This has direct implications on the drainage layout and needs to be clarified. At the northeastern boundary of the site, where it adjoins Clongriffin Road, there's a long narrow strip of land shown to be taken in charge, however this road is intended to be taken in charge by DCC. Again, this should be reviewed and clarified. Public areas must drain directly to public drainage infrastructure

The Taking in Charge strategy has been discussed with representatives of DCC on Friday the 27th March 2026. The full extents of Taking in Charge have been issued to DCC following this meeting. The extent of Taking in charge has been fully co-ordinated between all members of the design team. In relation to the parking spaces, it is the client's aspiration to retain these car parking spaces in private control, however, it is likely that this would be by means of

a permit system which would result in all spaces being taken in charge by DCC. Please refer to the Car Parking Management Plan prepared by CS Consulting and submitted under separate cover within the planning application.

2.3. PARKS, LANDSCAPE & BIODIVERSITY ISSUES

The applicant is advised that the following points be addressed within the final LRD application documentation:

1. Open Spaces and Taking in Charge: There are no park public open spaces within this area of the Clongriffin masterplan. Park Services do not manage public realm areas. The TIC plan shall be reviewed to ensure that that all proposed public realm areas will be appropriately managed into the future. Park Services note that the site area is serviced by Fr Collins Park for public children's play areas and the inclusion of any public play area in the layout will require an identified maintenance and management agent

Through a rigorous process of interrogation and design development between members of the team in response to queries regarding Taking In Charge (TIC) of the site, the proposals ensure that there are no play facilities located within the public open space of the site. In response to coordination with DCC, it is recognised that Fr. Collins Park services a regional requirement for outdoor play; play areas have therefore been removed from open space taken in charge. Allocation of Community, Cultural and Arts Spaces within the public open spaces has also been removed.

A revised TIC strategy and site-wide delineation ensures that the configuration and materiality of Market Street provides a legible and simple network of open spaces without requiring elements, spaces or components that may complicate or hinder TIC management requirements. Please refer to the planning consultant's documentation for further details on TIC delineation across the development site.

2. Communal Open Spaces: Vent structures shall be designed with louvered sides and green roofs to minimise their visual impact. Vents shall be set back from seating areas /play spaces

It is agreed that the ventilation strategy shall be designed to minimise visual impact: the design team has coordinated a flush vent system to minimise vertical extrusion from slab into the communal open space. This has been strategically surrounded by vegetation to screen the visual impact while retaining maintenance access. Please refer to the Landscape Drawings accompanying this application (General Arrangements (100 series) and sections drawings).

3. Full play details, including a schedule of play equipment shall be included in the application

A play strategy has been developed to cater for the recreational needs of residents across the Phase 2 site development area. This has been developed with input from the design team - ensuring it addresses planning and building requirements of the development.

Public play requirements are met regionally through those in Father Collins Park and other open space areas; proposed play areas cater for communal open spaces within each block (7, 8 and 9). Details of the play strategy are provided in the Play section of the Landscape Design Report, demonstrating method of delivering on the requirement for a varied, accessible and inclusive play strategy within the scheme.

4. Privacy shall be reviewed at communal building entrances to the courtyard Communal Open Spaces and, where required, privacy screens and/or planting shall be deployed to minimise views of private windows at courtyard level.

Revisions to the communal open space across each of the podiums ensure that privacy has be achieved between private open space (residential terraces areas connected to the internal apartments) and communal open space (residents' outdoor amenity areas within the courtyards, including pathways, lawn and play). This screening is achieved through a tiered approach to vegetation, and maximising distances between terrace and accessible pedestrian areas. This is set out clearing in the accompany landscape drawings.

5. The seating areas shall include one or two covered seats for use in poorer weather. Long linear seats shall include pull in areas for wheelchair users

Provision of seating is central to the proposed public realm strategy. A suite of linear modules offers a range of elements including arm and back rests: a number of these are located in areas that can cater for wheelchair users to pull in, and in areas close to buildings that can offer a sense of enclosure. Covered seating is not provided as it is not considered appropriate due to the impact that this would have on the wider public realm open space network.

6. Lawn areas shall be included within the courtyard design, for example to allow spill out from play areas

A range of soft surface finishes are included within each podium-level communal open space. With reference to the General Arrangement drawings developed for floor 01 (FL01), these plans include amenity lawn areas for residents' use.

7. Materials: Materials for surfaces at key areas, e.g meeting areas/plazas , building entrances shall in general deploy natural stone. 50% of external seating shall include arm and back-rests. 50% of all external cycle parking stands shall have weather covers. The location for a public artwork shall be indicated on the landscape masterplan

A materials strategy has been reviewed: areas of notable pedestrian use are of a natural stone finish. For example, these include main building entrance areas. Proposed seating is formed using a modular system: this approach allows for a range of units to adopt arm, back and seating finishes - detailed in the 900 series.

Having assessed the available public open space within the wider scheme, it has been deemed not feasible to include weather covers for bicycle parking areas due to the impact that this would have on the wider public realm open space network. A location for public art work has been indicated south of the Zone 07 building.

8. Required Submission Documents:

Landscape Masterplan	Prepared by The Paul Hogarth Company, and included in application. Sheet 100 and 101-107.
Hardworks/softworks outline plans	Prepared by The Paul Hogarth Company, and included in application. Hardworks - refer to sheets 101-107, Softworks - refer to Sheet 100 for schedule
Landscape Design Statement	Prepared by The Paul Hogarth Company and included in application.
Open spaces and play spaces Key Plan with area calculations & schedule of required COS and provided COS.	Summary of open space network and play spaces is provided in the Landscape Design Report - refer to Sitewide Play Strategy, with supporting schedule of

	Communal Open Space (COS) calculations provided in Section 5.6 of the Architect's Design Report.
Boundary Plan with details,	The scheme has no boundaries, walls etc. All details of public realm tie-ins are provided on the relevant landscape drawings, prepared by The Paul Hogarth Company, and included in application. Refer to Landscape Architect's drawings 709-712 for suite of conditions.
Landscape Sections and Elevations	Prepared by The Paul Hogarth Company, and included in application. Refer to Landscape Architect's drawings 700-708 for suite of site sections.
Green Roof Plan with biodiverse planting	A green roof plan is prepared by CS Consulting and included as part of the engineering pack. Details on planting mix can be on Landscape Architect's sheet 100 for outline planting schedule.
AA Screening/NIS	AA Screening prepared by Bady Shipman Martin, and included in application.
Ecological Impact Assessment	Ecological impact is considered to be captured in Chapter 8 of the EIAR.
Biodiversity Enhancement Plan including details of 'bat friendly' lighting	Details of biodiversity enhancement opportunities are included in the Landscape Design Report prepared by The Paul Hogarth Company. Details in relation to wildlife friendly lighting is contained in the Site Lighting Report prepared by EDC.
Invasive Species Report	Invasive Species Surveys were carried out as part of the preparation of the EIAR Chapter 8. Details of any findings are contained within this chapter.

2.4. TRANSPORTATION PLANNING ISSUES

1. Public Transport Provision

a) The Transport Planning Division (TPD) requires more certainty on proposed road and transportation links in terms of the proposed Bus Connects D3 route to the northeast of the site. The applicant is requested to engage further with Dublin City Council, and the NTA prior to lodgement of the Stage 3 application.

CS Consulting have met with representatives of Dublin City Council on 27th February and 19th March 2026. Consultations have also been held with the NTA prior to the submission of the LRD Application. An options selection process has taken place in consultation with the NTA which has demonstrated that the proposed D3 route shall be implemented along Main Street in the short term until such time as Station Road is constructed, connecting Marrsfield Avenue to Station Square. This road and associated bus infrastructure shall be constructed under a future development phase. A bus layover is proposed by the NTA to the south of Station Square which has been co-ordinated with the proposed development. This infrastructure shall allow the D3 bus route to progress in the interim.

b) In terms of bus stops, along the southern boundary of the site south of Zone 9, the TPD are aware that the NTA have proposals to provide for bus stop and layover which will likely remove much of the car parking and loading proposed along this section. The applicant is requested to ensure that there has been agreement in relation to these proposals with the National Transport Authority prior to lodgement. Moreover, any removal of loading from the south of Zone 9 should be relocated to an accessible area to ensure appropriate servicing of the block

The design team have received plans from the NTA of their proposals to provide a bus stop along the southern edge of Zone 9. These plans have been incorporated into the revised design proposal. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0102.

2. Site Access & Pedestrian Priority

a) There are concerns that a number of junctions comprise uncontrolled crossings however do not contain raised entry treatments. The applicant is requested to investigate the potential to provide raised entry treatments at proposed junctions to ensure pedestrian priority as per DMURS.

The proposed junction layouts have been reviewed in the context of DMURS guidance in relation to pedestrian priority and raised entry treatments are proposed at proposed junctions with Clongriffin Main Street. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C- 0102.

b) It is unclear from the submitted documentation how the proposed development integrates with the existing street network in terms of pedestrian cycle crossings which are in compliance with CDM and DMURS.

The proposed development has been reviewed in the context of the existing street network. It is proposed to upgrade an existing uncontrolled crossing to a signal-controlled crossing at the junction of Lake Street and Clongriffin Main Street. Additionally, it is proposed to provide an additional uncontrolled crossing of Main Street at the junction with Market Lane. The provision and upgrade of these pedestrian crossing facilities shall improve the connection and integration between the subject development site and the existing educational facilities to the south of Clongriffin Main Street. Please refer to CS Consulting drawing no. L106-CSC-XXXX-DR-C-0102.

c) The GDA Cycle Network indicates main street as a secondary route which is intended to provide connections between primary cycle route and connecting local zones to primary routes. Based on the proposed layout, it is unclear how cyclists from the site can safely move westbound along main street. Furthermore, the site is located directly adjacent to the Belmayne Main Street Bus and Cycle Active Travel Scheme. The applicant is requested to engage with this Division prior to lodgement in order to ensure proposals align with the scheme in this regard

It is acknowledged that the GDA Cycle Network indicates main street as a secondary route. The GDA Cycle Network Plan also includes Market Street as a greenway link which shall connect the subject development Belmayne Avenue via Father Collins Park. Existing cycle facilities on Main Street consist of a segregated cycle track between Hole-in-the-Wall Road and Park Avenue before transitioning to/from a Shared Bus Lane at the junction of Park Avenue. At present the shared bus lane continues across the southern boundary of the development site, terminating at Station Square.

It is noted that the DCC Active Travel Network website states the following with respect to the implementation of the proposed network.

"The Active Travel Network will be achieved by:

- *Reallocating existing road space.*

- *Incorporating segregated cycle lanes at suitable locations.*
- *Widening and decluttering footpaths.*
- *Considering the needs of all users including disabled people.*
- *Promoting biodiversity through tree planting and landscaping.*
- *Facilitating social interaction by enhancing communal spaces."*

The applicant recognises the merits of providing a dedicated cycle facility along Main Street which can help support the transition to active travel modes for the residents of the subject developments and surrounding established neighbourhoods. However, it is our view that this upgrade should only be implemented if there is consistent and continuous provision of infrastructure. In this regard, it should be noted that there are significant barriers to upgrading the full extents of the existing shared bus lane to a segregated cycle track at the location in question. At present the existing building line of the blocks to the west of the development site is located such that there is not sufficient width to accommodate a two-way cycle path and footpath at this location without impacting on the existing building line.

As such, it is our view that reallocation of the existing road space is required in this instance in order to provide a continuous, consistent and legible cycle route. CS Consulting have prepared preliminary plans which indicate how a two-way cycle lane could be provided along the length of Clongriffin Main Street between Park Avenue and Station Square. It is our view that this infrastructure should be installed in a single phase and a piecemeal approach should be avoided. As such, we do not propose to construct a section of this cycle route as part of the subject development but rather propose to future-proof the development along the southern boundary with Main Street to accommodate this upgrade by others in future.

d) In the southeast corner of the site a crossing is proposed at 1.6m in width. This appears to be sub-standard; the applicant is requested to address this concern.

The site layout has been adjusted in response to this item. The crossing has been increased in width to 2.0m. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0102.

e) There is a proposed footpath section which is a reduced pinch point beside Block 8E. the applicant is requested to investigate this issue with a view to ensuring the pinch point is removed

The site layout has been updated in response to this item. The apparent pinchpoint in the TIC footpath has been removed and a minimum footpath width of 2.5m is provided at all locations. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0102.

f) An existing pedestrian crossing is located along Grange Lodge Avenue which appears to conflict with the proposed bicycle parking. The applicant is requested to clarify the interaction in this regard to ensure there is no impact on pedestrian movements.

The pedestrian crossing and the proposed bicycle parking has been reviewed, and the layout has been updated to ensure that the crossing remains clear, with no obstruction to pedestrian thoroughfares. Bicycle parking is positioned outside of the effective crossing zone. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0102.

g) From the 'Proposed Street' southwards, there appears to be a natural desire line into Beau Park Avenue. There is no provision proposed here for pedestrians in terms of crossing either uncontrolled or controlled. The applicant is requested to investigate the potential of providing for this route.

In response to item 4(2g) of the LRD opinion, an uncontrolled crossing has been proposed on Clongriffin Main Street at the location of Beau Park Avenue and Market Street. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0102.

h) With regards to car and bicycle movement from the site westbound towards Hole in the Wall Road, there appears to be restrictions in this regard, as southbound access onto Main Street to travel westbound is impeded due to the central median along Main Street and other site constraints. There is concern that this may generate increased traffic towards Clongriffin Station. The applicant is requested to provide details on how cyclists and motorists can make this movement without increasing traffic flow towards Clongriffin Station

Following consultations with DCC, the junctions between the proposed development access roads and Clongriffin Main Street have been proposed as left-in/left-out junctions, similar to the adjacent junctions of Friar Street and Dermot Street. Additional traffic modelling has been undertaken at the proposed left-in/left-out in response to item 4(2h) to demonstrate that any additional eastbound traffic does not have a detrimental effect on the operation of the proposed junctions on Clongriffin Main Street. Please refer to section 5.3 of this document for details.

It is noted that alternative routes are available for development traffic travelling from Zone 7 and Zone 8 to Hole-in-the-Wall Road via Part Street and Park Avenue or via Marrsfield Avenue to the north.

Furthermore, the permitted SHD application on the subject development lands currently includes left-in/left-out at the proposed junction locations with no provision for right-turn from the subject development site directly onto Clongriffin Main Street

i) With reference to the above point (h), the applicant is requested to ensure that the stated analysis using the TRL Junctions 8 software to assess the additional traffic generated by the proposed development and the performance of nearby junctions is carried out.

Please refer to section 5.0 of the Traffic & Transportation Report which contains transport modelling results for the junctions of Park Avenue / Clongriffin Main Street, Lake Street / Clongriffin Main Street, Market lane / Clongriffin Main Street. Other junctions surveyed have been scoped out of a detailed transport modelling assessment in accordance with TII Traffic and Transport Assessment Guidelines.

j) A proposed shared street (pedestrians I cyclists) approximately 235m in length forms the northern extent of the site running from the east at its junction with Clongriffin Road to the west of the site tying into Park Street. This division request the applicant provide details of the route in terms of the proposed width of same with appropriate cross sections. This division notes the nearby Parkside Gardens route which comprises a c.4m active travel route with 2m planting at either side

Market Street has been designed as a shared pedestrian / cycle facility with a width of 4.0m. Updated cross-sections have been provided on CS Consulting drawing no. L106-CSC-XX-XXDR-C-0110 and TPHC Landscape Architect drawing no. 1622 704 Section E -Market Street.

Road markings and signage have been proposed on the shared route, details of which are provided on CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0108.

k) The proposed shared street (pedestrians I cyclists) appears to be meandering in nature; there is a concern in terms of forward visibility whilst there appears to be a pinch point with a considerable reduction in width of the shared street. Whilst this division welcomes the proposed there is a concern in terms of the design. This division recommends that the application address the concerns in relation to the proposed shared street as outlined above

The horizontal alignment of the proposed shared pedestrian cycle route on Market Street has been updated to ensure that the appropriate visibility is provided while maintaining some curves which shall assist in maintaining reduced cyclist speeds along this shared corridor.

3. Cycle Parking

The applicant is requested to prepare a Bicycle Design Statement (BDS). The BDS should outline all details on how all bicycles, including the universal design bike can safely and with ease access the proposed bicycle parking from the public road. The BDS should also address the following specific requirements:

The Bicycle Design Report has been prepared by Cronin Sutton Consulting in response to LRD Opinion Item 4(3a). This responds to each item as follows:

a) Information on the expected number of staff of both the retail and CCA shall be provided in support of the quantity of staff cycle parking. Further detail regarding arrangements for retail and CCA staff and visitor access to dedicated cycle parking facilities should be provided.

The anticipated number of staff for both the retail and CCA has been outlined within Section 5.4 of the Bicycle Design Report.

b) Separate secure access to staff cycle parking shall be provided

The retail and CCA spaces are spread throughout the proposed development site with no central provision. As such, it is preferable to provide staff bicycle parking in proximity to the final destination. The retail and CCA staff parking shall be specifically allocated within the development bicycle stores. 2no. CCA staff spaces shall be provided in Zone 7, 2no. CCA staff spaces shall be provided within Zone 8, 6no. retail staff spaces shall be provided within Zone 9. This meets the standards required by the DCC Development Plan 2022-2028 which are described in more detail in section 5.4.

c) 5% of visitor cycle parking shall be designed to accommodate larger non-standard cycle parking equipment, in accordance with Section 6.5 of the Cycle Design Manual (2023). These non-standard visitor spaces should generally be located in proximity to the proposed community I cultural uses.

5% of bicycle parking spaces within the internal bicycle stores shall be suitable for use by non-standard cycles (58no. non-standard, 1,133 total internal spaces). In the external areas, 5% of the required quantum shall be suitable for non-standard bicycles. The non-standard spaces shall be spread throughout the development site in proximity to community and cultural uses. Please refer to landscape architect information

d) Detailed scale drawings of all cycle parking areas should be included as part of the application outlining type and quantum per store/area. It should be ensured that adequate separation distances between racks and internal access corridors for ease of use and functionality and without conflict with landscaping proposals or walls is achieved (refer to the Cycle Design Manual, 2023). Ensure bicycle stores are located at the most convenient areas close to stairs/lifts in the undercroft area. Ensure the access doors to these stores are appropriately located

Section 5.3 of the Bicycle Design Report provides detail on the proposed bicycle storage rooms including a typical breakdown of cycle storage types provided. The routes between bicycle stores and building cores/entrances are shown in the Report. Additionally, Section 5.4 of the Architects Design Statement includes scaled drawings.

e) There is a concern that the proposed cycle connection at the northwest of the site and its tie into the existing road network in terms of overall cycle links and priority at the junction. The applicant is requested to investigate the potential for improvements in the design in this regard

The proposed cycle connection at the northwest of the site has been redesigned in order to promote a regularised cycle environment which clearly indicates priority between road users. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR C-0108 which indicates the proposed bicycle crossing at the junction of Market Street and Lake Street. The proposed junction design aims to tie in with the permitted shared street which is currently under construction. Please refer to CS Consulting drawing no. L106-CSC-XX-XX-DR-C-0128 for details of existing active travel facilities in the vicinity of the proposed development. However, it is considered that segregation of pedestrians and cyclists at this location and provision of separate crossing facilities is in the interest of the safety of both pedestrians and cyclists at this location. The crossing is an uncontrolled crossing similar to TL601 of the Cycle Design Manual. Cyclists shall give way to motor vehicles at this location.

f) In terms of the proposed shared cycle path to the north of the site, the tie into the existing Lake Street lacks clarity in terms of the expectation for cyclists when they reach the east side of Lake Street. The applicant is requested to clarify this.

The proposed cycle crossing of Lake Street has been redesigned as discussed in response to item v. Cyclists, when reaching the east side of Lake Street westbound are informed that they are approaching a junction where motor vehicles have priority. When travelling eastbound cyclists are informed that they are entering a shared facility with pedestrians.

g) The applicant is requested to investigate the pinch point along the shared cycle route adjacent to the community culture area. This appears to reduce to cl,4m.

The apparent pinch point has been removed in proximity to the creche. The shared facility has a width of 4.0m from start to finish. Please refer to L106-CSC-XX-XX-DR-C- 0102 for details.

4. Car Parking

a) The applicant is requested to investigate the proposed quantum of perpendicular parking with a view to a reduction of same in line with DMURS Section 4.4.9 recommendations. This is of particular concern in relation to perpendicular parking directly at several of the proposed junctions.

DMURS section 4.4.9 states the following with respect to the provision of perpendicular parking on both sides of the street:

"Perpendicular parking should generally be restricted to one side of the street to encourage a greater sense of enclosure and ensure that parking does not dominate the streetscape."

The proposed layout has been updated in response to the opinion item above and areas where perpendicular parking had been proposed on opposite sides of the road have been replaced by parallel parking.

b) In relation to the proposed angled parking adjacent to the creche, angled parking is not acceptable to this division and should be amended to parallel parking

The parking layout adjacent to the creche has been updated to provide parallel parking in place of the angled parking. Please refer to CS Consulting drawing L106-CSC-XX-XX-DR-C- 0102.

c) Any alterations to the proposed car parking arrangements as outlined above should seek to minimally impact the existing proposed car parking ratio in this regard.

It is noted that several of the alterations undertaken to respond to the items requested in the LRD Opinion have required that the quantum of car parking be reduced, particularly the responses to items 4(1b), 4(4a), 4(4b). The design team has done what is possible to replace these parking spaces elsewhere on the proposed development site while remaining cognisant of site development constraints such as visibility splays, bin staging areas, bicycle parking, and pedestrian crossing points. As a result, there has been a slight reduction in the overall quantum of car parking proposed within the subject development site. Please refer to CS Consulting drawing L106-CSC-XX-XX-DR-C-0102 and section 7.0 of this document for details.

d) The applicant shall ensure that any proposed EV car parking be located within privately owned areas not to be taken in charge by Dublin City Council.

The proposed development layout has been updated to ensure that all proposed EV parking spaces shall be located within the undercroft areas of the proposed development and shall not be offered for Taking in Charge by Dublin City Council. Please refer to CS Consulting drawing L106-CSC-XX-XX-DR-C-0108 and HJL architects drawing no. CWL-HJL-ZZ-ZZ-DR-A- 0004 for details.

e) The applicant is requested to investigate the potential for an increase in car share spaces. 2 no. car share spaces proposed appear to be low considering the proposed car parking ratio is below 0.5

It is proposed to increase the quantum of dedicated car share spaces from 2no. to 4no. in response to this LRD Opinion item. It is further noted that there are a number of existing car share vehicles in operation within walking distance of the subject development site. Please refer to section 3.8 of this document for further information.

f) The applicant is requested to submit a Car Parking Management Plan (CPMP), in particular with details on how car parking will be managed on the site and how the loading bays and indented area for the creche will be managed. As noted previously 'drop off' or 'set down' proposed for the creche use are not measures provided in the Traffic Signs Manual and should be amended as such. Furthermore, the length of the proposed indented bay outside the creche is deemed excessive in nature given the proximity to LDA units. This should be removed or substantially reduced in length to encourage more sustainable modes of travel.

A Car Parking Management Plan (CPMP) has been prepared and is included as part of this application. The CPMP sets out how car parking will be managed across the site including a the creche site. The layout at the creche has been reviewed to ensure compliance with the Traffic Signs Manual. Please refer to the Car Parking Management Plan submitted under separate cover for further details.

g) The CPMP shall set out how car parking space across the development are allocated per use within the standards contained within Table 2 of the Dublin City Development Plan 2022- 2028. The applicant should note that the quantum figures within table 2 include visitor spaces.

The updated CPMP sets out the allocation of car parking spaces across the development by land use, in accordance with the standards set out in Table 2 of the Dublin City Development Plan 2022–2028, including the provision of visitor parking.

5. Motorcycle Parking

As per Section 6.0 of Appendix 5 of the Dublin City Development Plan 2022-2028, the development shall include provision for motorcycle parking in designated, signposted areas at a rate of 5% of the number of car parking spaces provided. The 15 no. spaces proposed appear to outline a shortfall in this regard

The proposed motorcycle provision has been increased in response to the above item. Additional motorcycle spaces have been provided within Zone 7 and Zone 8 to ensure that the proposed quantum is in accordance with the *Dublin City Development Plan 2022-2028*. Please refer to CS Consulting drawing L106-CSC-XX-XX-DR-C-0102 and HJL architects drawing no. CWL-HJL-ZZ-ZZ-DR-A-0004 for details.

6. Quality Audit

a) The applicant should provide a Quality Audit as outlined in Advice Note 4 of DMURS and associated Designer Feedback Form at full application stage. Any recommendations made by the auditor and accepted (or alternative proposal by designer) should be incorporated into the design which is submitted as part of the application to ensure the integrity of the design.

A third-party Quality Audit has been undertaken by Roadplan Consulting with respect to the subject development site. The Quality Audit has been submitted under separate cover within the planning application.

b) A response to Objective SMTO10 (Walking and Cycling Audits) is required.

A third-party Quality Audit has been undertaken by Roadplan Consulting with respect to the subject development site which includes for walking and cycling.

c) The proposed shared street to the north of the site is included in the Quality Audit. The proposed route and connections to and from the site should be consistent with the Cycle Design Manual, 2023.

The proposed shared street to the north of the site has been included within the Quality Audit. All items raised within the Quality Audit have been implemented as agreed with the auditor. The proposed route and connections have been designed in accordance with the Cycle Design Manual, connecting to the existing pedestrian and cycle facilities outside the site.

7. Taking In Charge

a) The applicant is requested to provide a revised Taking in Charge drawing noting that piecemeal taking in charge is not acceptable to the Roads Authority and that the Taking in charge extends from back of footpath to back of footpath 'Street' from a Road Maintenance element but also for other Divisions the drawing should include the public and private areas demarcated and provide footpath widths at 5.0m intervals on any proposed areas to be taken in charge in this regard

The Design Team and the LDA met with representatives of DCC on 27th February 2026 to discuss the proposed areas for Taking in Charge and any issues associated. It is critical that the LDA are in control of the car parking spaces on the proposed side streets as these spaces perform a crucial function in supporting the future residents of the development. The LDA are open to discussions regarding the application of a permit-type system as part of a condition of planning for the subject development, however as there has been no agreement at this stage with regard to the implementation of a suitable permit system it is our intention to show these spaces within the area to be managed by the LDA. It is acknowledged that this is contrary to the request outlined within the opinion text above, however, it is considered that this item can be dealt with post-consent by way of condition.

b) The street shall be designed in accordance with Dublin City Council 'Taking In Charge' Standards and 'Construction Standards for Roads and Street Works'. Accordingly, the following design revisions are required:

i. No private development shall overhang or encroach on the street either above or below ground level.

ii. Drainage infrastructure to be re-designed to avoid any routing of private infrastructure beneath the street (applicant to refer to Drainage Division's LRD Opinion Report for detailed requirements).

iii. The applicant is requested to incorporate the comments from the Parks Department.

iv. Public Lighting along the street to be provided in the form of public lighting designed in accordance with DCC Public Lighting & Electrical Services Division's requirements for same.

The proposed streets shall be designed in accordance with the Dublin City Council Construction Standards for Roads and Street Works document. No private development shall overhand or encroach on the street above or below ground level. It shall be ensured that routing of all private drainage infrastructure shall not be beneath the public street. Comments from the Parks Department have been addressed by the landscape architect under separate cover. All public lighting shall be designed in accordance with DCC Public Lighting general Specification.

3. CONCLUSION

In conclusion, it is respectfully submitted that the proposed application has addressed the issues raised by Dublin City Council 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.