LRD Application

Response To LRD Opinion

For Amendments to Permitted Development at Phase 2 of the Former Royal Liver Site

Brady Shipman Martin
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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) Application to Dublin City Council (DCC), on behalf of The Land Development Agency (the 'Applicant'). The subject site (hereafter called 'the Site') is located at the former Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12. The site is bounded by Kylemore Road (R112) to the west; Old Naas Road to the north; Naas Road (R810) to the south; and "Brooks" (Building Providers) to the east.

2. RESPONSE TO DUBLIN CITY COUNCIL

In its Opinion of 18th August 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 ISSUES

a) The Applicant is requested to submit a revised materials palette for Blocks B1, B2, C1 and C2 along the Naas Road frontage. The Planning Authority is of the opinion that the current design has reduced the architectural definition of this frontage, resulting in elevations that appear flat and monolithic and lack sufficient depth and articulation. The Design Statement should demonstrate how enhanced architectural detailing, material variation and a more considered use of brick tones can improve the visual quality of these key frontage buildings.

A full response to this item, and Item 1 (b) is provided by Henry J Lyons in Section 9 of their Design Statement. This is summarised in this report.

The extant permitted scheme is characterised by a full height, building envelope wrap-around balcony framing system in two tones (black (B1) and 'Corten' steel (B2,C1,C2).

As part of the Phase 2 amendments, HJL has undertaken a comprehensive review of the facade design, considering the scheme as a whole. The facades must be considered as part of the overall development, delivering a high-quality architectural response while maintaining appropriate cost efficiency to support the viability of the project and the delivery of affordable purchase and cost-rental homes.

The South Facade has a formal relationship with the Naas Road, which is a strategic national primary route. The concerns of the planning authority at pre-planning stage regarding the submitted material and share the aspiration to ensure a strong building line with a clearly defined architectural expression.

The scheme has sought to improve both the design of the elevation and the quality and clarity of the presentation material supporting the submission.

The following alterations are proposed, in response to DCC concerns.

- The updated proposal maintains 'brick' as the principal facade material.
- The urban design and facade material approach extends the language of the phase 1 blocks to the Naas Road, building on the quality and character of the overall development.
- The formality of the 1+3 rhythm in the previously permitted version is retained (B1 as a lighter brick, and B2,C1,C2 as a contrasting darker tone). This approach eschews the temptation to present more variety in the Naas road elevation allowing the formal presentation of this new urban 'district'.
- The feature framing to the Naas Road is reconfigured, the ground floor is opened up to enhance the public realm and the framing at upper levels has been altered to strengthen the concept of vertical transition and façade layering when read from any view point along the Naas Road.

The above is set out in more detail in the Architects Design Statement and is supported by Photomontages prepared by Modelworks and a Visual Impact Overview Note prepared by Mitchell & Associates.

b) The Planning Authority has concerns regarding the revised facade treatment on the Naas Road frontage, where the proposed metal framing elements terminate at fifth floor level. The previously permitted design incorporated a continuous vertical framing element extending to roof level, providing a stronger architectural expression and visual emphasis along this strategic route. While the provision of balconies is welcomed, concerns remain regarding their visual impact, functionality and potential exposure to traffic noise, air pollution and privacy issues. The Applicant is requested to review the faqade design of Blocks B1,

B2, C1 and C2, including consideration of alternative balcony arrangements such as recessed balconies and an enhanced architectural treatment of the Naas Road frontage

The balcony framing system addressing the Naas Road has been altered to present a more dynamic and layered facade that reinforces the vertical transition across the Naas Road elevation. Rather than presenting full height framing on all elevations the revised approach crates a stepped arrangement which naturally terminates in the commercial landmark on the leading corner of the site.

In addition, the framing is proposed to be a powder-coated ivory colour. The proposed tone of the framing, read together with the ivory-coloured balcony balustrading system, comfortably contrasts with the proposed brick selection. The revised assembly, which also removes the ground level frame posts, presents a confident and expressive architecture with an appropriate level of variety.

Wind studies carried out have indicated that all balconies achieve acceptable comfort levels for seating. Colour matched solid balustrade corners have been included in appropriate locations. This addition serves to both further improve seated comfort and adds to the architectural language of the facade.

Air quality impacts have been reviewed by AWN Consultants in terms of Air Pollutants along the Naas Road. Pollutant concentrations at Ground Floor level are within the acceptable ambient air quality standards, this is also applicable to the proposed balconies. Pollutant concentrations will decrease with increasing distance from the road, this includes height.

As per the parent permission, the noise levels at the Naas Road facade are marginally in excess of the guidance threshold. However, the guidance document allows for the offsetting of impact on private amenity spaces through provision of communal amenity spaces that meet the guidance criteria. The EIAR calculations, as submitted with the parent permission, indicated that much of the podium area meets the noise criteria and may be used to offset the impact. There are a multitude of semiprivate and public amenity spaces available to residents throughout the scheme.

c) The Planning Authority has concerns regarding the location of the creche outdoor play area adjacent to the Naas Road. While efforts have been made to provide screening, concerns remain in relation to noise and air quality impacts. In accordance with Objective QHSN019 of the Dublin City Development Plan 2022-2028, outdoor play areas should be appropriately located and protected from sources of pollution. The Applicant is requested to explore alternative locations for the play space, including relocation adjacent to the proposed community facility, or otherwise provide a robust justification demonstrating the suitability of the proposed location

As part of the proposed amendments the location of the creche has been to relocated to the single storey element between Blocks B1 and B2. The revised location provides:

- Improved proximity to public transport links.
- Direct frontage onto the central plaza, integrating the facility within the public realm of the scheme; and
- Greater scope for enhanced external amenity space serving the crèche.
-

The revised crèche courtyard benefits from a southerly orientation. Sunlight amenity testing demonstrates a pass rate in excess of the 50% threshold required for compliance with the relevant BRE guidelines.

Noise & Air Quality

A noise impact assessment carried out by AWN concluded that the noise levels in the external courtyard area will be within the criteria adopted from BS8233 (recommendations for noise levels in external amenity areas).

A 3m high brick faced wall provides both physical and acoustic separation from the Naas Road. Playful circular opes are included for visual interest and these will be filled with Perspex screening to ensure that the barrier remains effective for screening noise.

An air quality assessment was also carried out by AWN and concluded that predicted pollutant concentrations will comply with the relevant air quality limit values, indicating that significant air quality effects are unlikely at the creche courtyard.

A range of locations and plan layout arrangements were tested, as set out in Section 9 of the Architects Design Statement, to establish the optimum position for the crèche and its external play area.

d) The Applicant is requested to submit an updated Basement Impact Assessment to reflect all proposed amendments to the basement layout and extent.

A Basement Impact Assessment has been prepared by Ayesa and is submitted as part of the application pack. It concludes that the ground movement analysis has concluded that the predicted damage to the neighbouring properties would be deemed to be not sensitive to the excavation.

e) The Planning Authority has concerns regarding the location of the car park ventilation structures shown on Page 45 of the Architectural Design Statement, which appear to be positioned in close proximity to residential units within the C and D podium area. The Applicant is requested to review the location of these structures and consider relocating them to more central locations where they would have a reduced impact on residential amenity.

The design team has carried out an extensive review of the proposed car park ventilation structures located within the Block C & D podium area.

- The car park ventilation structures are located a minimum distance of 3.74m from the Block C1 facade.
- The positioning of the structures is governed by the functional requirements of the basement car park below.
- Ventilation intakes and extracts must be located over vehicular circulation aisles rather than over parking spaces, in order to ensure effective air movement and compliance with ventilation performance requirements.

These constraints determine the available positions for the structures, which are shown on the accompanying landscape plan (excerpt included opposite).

Accordingly, the structures have been retained in their reviewed positions, with mitigation measures set out in Section 9 of the Architects Design Statement.

f) The Applicant is requested to address the visual impact of the proposed car park ventilation structures and provide details of measures to mitigate their appearance when viewed from adjacent residential units and communal open spaces. Such measures may include architectural screening, decorative treatments and/or enhanced landscape planting.

The following design measures have been incorporated to mitigate the appearance of the ventilation structures when viewed from adjacent residential units and communal open spaces:

- The car parking structure sits low with the podium surface, avoiding visual obstruction within the amenity courtyard.
- Low-level herbaceous and ornamental shrub planting is proposed around the perimeter of each structure, reducing their visibility at podium level.
- The proposed tree planting provides canopy cover that screens views of the structures from overlooking apartments at upper levels.

Some advantages of this design approach are as follows:

- The solution is simple, robust and low-maintenance, ensuring the mitigation measures remain effective over the long term.
- Retaining a low structural profile and low-level planting maintains clear visibility across the podium courtyard, supporting legible wayfinding and passive surveillance in the interests of residential amenity and safety.

g) The Applicant is requested to submit an acoustic assessment of all mechanical ventilation and extraction systems associated with the basement car park to demonstrate that noise levels will not adversely impact residential amenity. The Applicant should also demonstrate that the proposed ventilation strategy complies with all relevant air quality, environmental health and building standards.

A Noise Impact Assessment has been prepared by AWN Consulting. Plant noise emissions have been assessed against the criteria established as part of the original EIAR planning submission (planning ref. 4238/19). The assessment has considered noise from the proposed car park ventilation fans and assumed air source heat pumps. The results indicate that the predicted noise level at the closest apartment will be 42 dB LAeq,15min. This is below the most conservative night-time criterion of 45 dB LAeq,15min.

h) The Applicant is requested to review and strengthen the landscape strategy through the provision of enhanced planting buffers adjacent to residential units and public realm areas, with regard to noise attenuation, air quality improvement and biodiversity enhancement.

The landscape strategy has been reviewed post LRD Opinion by Mitchells & Associates. Enhanced planting buffers have been located in areas identified by DCC. This is set out in the Landscape Design Report and associated landscape drawings.

i) While the Planning Authority welcomes the active frontage and the inclusion of additional retail units at the corners of Blocks B1 and B2, however concerns are raised regarding the significant reduction in the overall supermarket floorspace compared to the previously permitted scheme. The Applicant is requested to review the retail strategy and examine opportunities to increase the supermarket footprint to ensure an appropriate level of retail provision for the future community.

As set out in the Planning Report and the Architectural Design Statement the proposed amendments reduce the permitted retail supermarket. The larger unit was of a scale that is beyond the requirements of many retail occupiers in the Irish market and without a significant quantum of parking for shoppers, would be very difficult to let. The potential of a unit of this scale remaining vacant would have a significant impact on the animation and provision of services for the scheme. It is considered that the smaller unit will still provide a significant offering to future residents.

A Retail Services Assessment Report is provided in Appendix 1 of the Planning Report which highlights the accessibility to existing retail provision in the area, the significant elements of which, including an adjacent Aldi and Lidl, which have been delivered since the granting of permission for the Royal Liver scheme. The changed context would further limit the potential occupation of a retail unit of this scale, while at the same time offers significant retail choice to residents within a short distance from the scheme.

The unit as now proposed is still a significant unit at c. 800 sq.m. This scale of unit would be of a comparable scale, as set out in the Retail/Commercial Report which is provided by Cushman & Wakefield, to similar trading units such as Tesco Metro/Local, larger Spar stores, and Musgrave Group brands such as Centra and smaller-format SuperValu stores. It is considered that the proposed amendments provide for a sustainable retail offering, and animation of the ground floor, located around the central public realm.

The Retail/Commercial Report concludes:

The proposed reduction from the previously approved large-format convenience store of over 2,000 sq.m to a smaller-format retail unit is considered both appropriate and necessary, having regard to the operational requirements of modern food retailing and the physical constraints of the site. Convenience stores of this scale typically serve a wider catchment area and require a significant level of customer parking, usually in excess of 100 spaces, to support customer demand and retailer operational expectations. Such a level of parking cannot be satisfactorily accommodated within the site without compromising other key development objectives or exceeding Development Plan standards. In this context, the originally approved store size is no longer considered an optimal or deliverable solution.

The proposed store format represents a more sustainable and commercially realistic retail model, reflecting contemporary retailer requirements while continuing to provide a strong convenience offering for the local catchment. Retail operators commonly trading from stores of a comparable scale include Tesco Metro/Local, larger Spar stores, and Musgrave Group brands such as Centra and smaller-format SuperValu stores. These formats are well-established in serving day-to-day shopping needs, providing a broad grocery offer and associated services while operating successfully with a more proportionate level of parking and site infrastructure. Accordingly, the revised retail strategy better aligns the scale of development with both market demand and the practical characteristics of the site, whilst ensuring the delivery of a viable and attractive retail offering for the surrounding community.

j) The Planning Authority has concerns regarding the removal of the roof terraces from Blocks C1 and C2 and the resulting reduction in communal amenity space, biodiversity value and opportunities for outdoor recreation. The Applicant is requested to reconsider the provision of rooftop amenity areas and to explore opportunities for the reinstatement of some or all of the previously proposed roof terraces.

As set out in the Architects Design Statement the communal amenity space, across the scheme, is provided at landscaped first floor podium courtyards and at roof level. Phase 2 as now proposed provides for an excess of

communal external amenity space, when compared to the Design Standards for Apartments, Guidelines for Planning Authorities ["2025 Guidelines"]. The 2025 Guidelines require 3,873 sq.m of space to be provided and 3,977 sq.m is provided.

The permitted development provided for a significant over provision of amenity space to compensate for the non-provision of private amenity space for all apartments. As noted in Section 6.2.7 of the Planning Report all apartments in Phase 2 now have private amenity space provided and as such the communal amenity spaces at roof level have been reduced in some blocks.

The LRD Opinion raises concerns about the perceived loss of communal amenity space as a result of the reduction in roof terraces. As noted above the permitted scheme significantly over provided for communal amenity as a compensatory measure for units in the permitted scheme which did not have private amenity space. As such the removal of roof terraces is not a reduction in amenity space but rather a redistribution of some communal amenity space to private amenity space.

Every apartment is now provided with private amenity space while also benefitting from access to communal amenity space in excess of the required standards.

k) The Applicant is requested to ensure that all application documentation is current, consistent and fully updated to reflect the proposed development. All information and supporting documentation required under Section 15.1 (Thresholds for Planning Applications) should be submitted as part of the Stage 3 LRD application.

Noting that this is an amendment application and some reports were submitted as part of the parent permission and are unchanged in the amendment application. All reports identified by DCC during both pre-planning and LRD Opinion stage as well as standard reports that relate to the proposed amendments have been submitted.

2.2. TRAFFIC & TRANSPORTATION MATTERS

The Transportation Planning Division recommends that the following items be addressed prior to the submission of a planning application:

1 Servicing

a) The applicant is requested to re-examine and provide clarity on the size and operation of the proposed loading bay to serve the supermarket and other uses within Block C. The spaces appear constrained to serve the proposed uses.

One of the amendments proposed as part of this application is the size (Gross Floor Area) of the supermarket. The supermarket has been redesigned in response to market / operator influences resulting in a reduction in the size of the supermarket unit. The reduction in unit sized has had a direct impact upon its logistical requirements including the size of rear stores (e.g temporary storage), and quantum of goods transferred and accordingly size of delivery vehicle, size of loading area and size of service yard. In consultation with market agents, its has been established that the smaller store will be serviced by a 10m rigid lorry (for goods collection and delivery including cold storage and dry goods vehicles). This 10m rigid lorry is significantly smaller to the articulated lorry that would have been ideally required to service the previous larger permitted supermarket unit. The loading bay, service yard and access

route have subsequently been redesigned to accommodate both a 10m rigid lorry and a rigid waste collection vehicle. compared to the articulated lorry that was necessary for the larger unit.

Accordingly, a smaller dedicated loading bay and service yard has been provided on the eastern side of the site to serve the supermarket and associated commercial units. Swept path analysis has been undertaken for a 10m rigid lorry, demonstrating that the service yard can be accessed, utilised, and exited safely. The vehicle tracking assessment is illustrated on DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105 which confirms that the proposed service yard and loading bay dimensions provide sufficient manoeuvring areas to accommodate the new smaller design vehicle without conflict with other site users. Accordingly, the proposed loading facilities are considered adequate to serve the new design proposals and provide an appropriate level of servicing provision for the supermarket and other uses within Block C.

b) The applicant is requested to submit auto-tracking assessments for all anticipated vehicle types accessing the internal road, including refuse trucks, light vans, emergency service vehicles, service vehicles and passenger vehicles. The applicant should submit auto-tracking drawings of vehicles that are anticipated to use the service yard and loading bay for retail use. Revised drawings should clearly demonstrate the delivery vehicles can enter, turn and exit the servicing yard and loading bay, and access/egress the service yard in forward gear.

The requested vehicle tracking assessment is presented in the accompanying DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105, which demonstrates that the internal road network, service yard, and loading facilities have been designed to accommodate the anticipated vehicle types associated with the proposed development.

c) It is considered that a servicing/loading bay is required to serve the residential units. The applicant is requested to examine the potential of incorporating a servicing/loading bay along the internal roadway. Auto tracking should be provided to demonstrate the proposed servicing/loading bay can safely accommodate light vans or other delivery vehicles.

In response to the above request a dedicated 'courier' bay of sufficient size to accommodate a light goods vehicle such as a van has been proposed on-site adjacent the eastern boundary of the site and accessed via the internal access road. The vehicle tracking assessment for the dedicated bay is presented in in the accompanying DBFL Drawing No. 260024-X-90-Z00-DTM-DR-DBFL-CE-1105.

d) The applicant is requested to provide further detail on waste collection. Waste/refuse collection shall take place on site and not on the public road. The applicant shall clearly designate an area for waste collection.

A dedicated service yard is provided within the development for waste collection and servicing activities. The service yard has been designed to facilitate on-site waste collection operations, ensuring that refuse vehicles can enter, service the development, and exit without requiring waste collection activities to take place on the external public road. Further details are provided in the accompanying *Delivery and Servicing Plan* (DSP) report which has been prepared as part of the application documentation. The DSP provides further detail on the proposed servicing and waste management arrangements, including the operation of the dedicated service yard and the procedures for waste collection associated with the development. The vehicle tracking assessment for the waste collection vehicle is presented in in the accompanying DBFL Drawing No. 260024-X-90-Z00- DTM-DR-DBFL-CE-1105.

e) A Service Delivery and Access Strategy shall be submitted as part of the application. The applicant is referred to section 2.4 Service Delivery and Access Strategy of Appendix 5 of the Dublin City Development Plan 2022-202, which provides information that should be contained within a Service Delivery and Access Strategy.

A *Delivery and Servicing Plan* (DSP) report has been prepared in response to the above request and accompanies this planning application.

2 Taking In Charge

a) The applicant is requested to revise the red line boundary to incorporate the 3 no. public on-street car parking spaces along Old Naas Road. The proposed works to the road will require a letter of consent to be obtained from the Transportation Planning Division. The applicant is advised to engage with the Transportation Planning Division as soon as possible to secure a letter of consent for the proposed works. There should be no private structures / infrastructure above or below ground within the existing or proposed taking in charge areas including outwards swinging doors.

Further to engagement with DCC transport division and the subsequent issuing of letter of consent, the highlighted 3 no. public on-street car parking spaces along Old Naas Road are now located within the amended red line boundary. Please refer to Henry J. Lyons proposed taking in charge layout, detailed in drawing PRL-HJLZZ-DR-A-0015.

3 Cycle Parking

a) A reduction in the quantum of short stay bicycle parking below the Development Plan standards may be considered, provided that the spaces are of a high quality, conveniently located and readily accessible for visitors. In this regard, the provision of 70 no. short stay bicycle parking spaces would be considered acceptable.

The cycle parking proposals have been reviewed and revised. As outlined in further detail within Section 5.4.2 of the DBFL Traffic & Transport Assessment Report this results in an overall increase in short bike parking from the previously permitted 43.5% to 53% of DCC's requirement representing a notable increase, which is part of an overall short stay spaces of 390 provided over the entire scheme. These are located throughout the site in conveniently located spaces.

b) The applicant should provide further details on the cycle parking in the Stage 3 LRD application, ensuring that all cycle parking complies with the National Transport Authority's Cycle Design Manual, 2023. Specification of bicycle parking stands, including the double-stacked cycle stands and cargo bike stands should be provided to demonstrate sufficient operating space is allocated for use

This is set out in section 5.4 of the Traffic & Transport Assessment prepared by DBFL Consulting Engineers. It sets out that a total of 1016 long-stay secure parking is provided, with 1004 being for residents and 12 being for staff of the various commercial units) and 88 short-stay are provided. The 88 spaces are additional to the 302 spaces provided as part of the Phase 1 proposal. The 88 spaces provided will include for both phase 2 and phase 3. An addition of 10 extra spaces is also provided as part of LRD opinion.

c) The applicant is requested to submit revised drawings showing 10no. Sheffield parking stands to be provided at Level 00 level adjacent to the entrance to the supermarket

In response to Item (c), a total of 18 Sheffield stands (36 cycle parking spaces) are now provided adjacent to the supermarket entrance, significantly exceeding the requested provision of 10 Sheffield stands. These stands are located in a prominent and convenient location to serve visitors to the commercial units and supermarket. Please refer to Section 5.4 for further details. These are shown on drawing PRL-MAS-ZZ-XX-DR-L-0101 prepared by Mitchells & Associates.

d) The entrance to the large cycle parking store (adjoining the supermarket) at Level 00 within Block C appears be via the car park entrance only. The applicant is requested to investigate the opportunity to provide an additional cyclist access along the western elevation.

In response to Item (d), an additional dedicated cyclist access has been incorporated to the large cycle parking store adjoining the supermarket. This provides improved accessibility for cyclists and supplements the access arrangements previously available. The revised access arrangement to/from this bike store is illustrated in the Figure 7-1 of the Traffic & Transport Report and in the Architects Design Statement.

4 Car Parking

a) The applicant is requested to provide a revised site layout plan for basement and ground floor levels, clearly denoting the intended use of the car parking spaces including residential, retail and /or other uses. This drawing should also provide detail on the 259 no. spaces with EV charging, with EV charging spaces clearly demarcated. The remaining parking spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging

This is addressed in Chapter 7 Parking Management Strategy in the Traffic & Transport Report. This sets out the intended use, management and access of the proposed car park including those assigned as EV parking bays.

b) With regard to the 9 no. car share parking spaces, a stated expressions of interest from at least 1 no. car-share operator should be included with the application to demonstrate feasibility.

A letter of interest from Enterprise Cars in included in the Traffic & Transport Report. The Phase 2 development proposals incorporate 5 no. dedicated car-share parking spaces located within internal zone 1 of the undercroft car park. These spaces shall be reserved exclusively for use by an approved car sharing operator and available for both residents, staff and general public. Further details are provided in Section 5.2.6 of the Traffic & Transport Report.

c) The applicant is requested to submit a Car Parking Management Plan clarifying how the parking spaces will be managed.

This is addressed in Chapter 7 Parking Management Strategy in the Traffic & Transport Report. This sets out the intended use, management and access of the proposed car park.

5 Reports & Drawings

a) "The applicant is requested to submit the following drawings and reports at the LRD application stage:

a. Walking and Cycling Audit
b. Car Parking/Cycle Parking Management Plan
c. Outline Construction Management Plan- including information on the timeline of construction and completion of the different phases across the site.
d. Mobility Management Plan including a Residential Travel Plan

e. Service Delivery and Access Strategy
f. Outline Construction Demolition Waste Management Plan
g. Operational Waste Management Plan
h. Operational Management Plan"

The requested supporting reports and plans have been submitted as part of the LRD application documentation.

- **Walking and Cycling Audit:** A Walking and Cycling Audit has been undertaken and reported within the Quality Audit report prepared by Bruton Consulting Engineers. This Quality Audit report accompanies the planning application.
- **Car Parking / Cycle Parking Management Plan:** Details of the proposed car parking and cycle parking management arrangements are provided within Chapter 5 and Chapter 7 of this report.
- **Mobility Management Plan / Residential Travel Plan:** A separate standalone Mobility Management Plan (MMP), incorporating a Residential Travel Plan, has been prepared and submitted as part of the planning application.
- **Service Delivery and Access Strategy**: The requested *Service Delivery and Access Strategy* has been prepared and accompanies the planning application. The strategy outlines the proposed servicing, delivery, and access arrangements for the development.
- **Outline Construction Management Plan:** The requested *Outline Construction Management Plan* has been prepared and accompanies the planning application by DBFL.
- **Outline Construction Demolition Waste Management Plan:** The requested *Outline Construction Demolition Waste Management Plan,* titled *Resource Waste Management Plan,* has been prepared and accompanies the planning application by AWN.
- **Operational Waste Management Plan:** The requested *Operational Waste Management Plan* has been prepared and accompanies the planning application by AWN.
- **Operational Management Plan:** An *Estate & Common Area Management Plan* prepared by Cushman & Wakefield is included in the application.

2.3. DRAINAGE DIVISION

Dublin City Council's Drainage Division recommends that the following items are addressed prior to lodgement of the final application:

a) There are a number of queries in relation to the management of surface water. It is noted that there is an overall increase in attenuation volume and therefore the applicant is requested to consider the provision of blue roof as part of the amendment, in order to align the design more closely with current policies and climate change challenges.

Current proposals are intended to align with the parent planning permission in which only green roofs were proposed. However, the proposed amendment application intends to provide a significant amount of additional green roof areas in comparison to the previously permitted scheme as discussed within Section 3.1 of the DBFL Civil Engineering Design Note, 260024-X-X-XXX-RP-DBFL-CE-0001 and HJL's proposed roof level site layout plan, PRL-HJL-ZZ-00-DR-A-0014A, respectively, as submitted.

In addition, typical green roof build-ups are proposed to be a Biodiverse Green Roof Systems in-leu of typical sedum planted extensive green roofs, providing significant positive environmental impact. Biodiverse Roof Systems are

designed to be self-sufficient and low maintenance compared to typical extensive buildups. Refer to Section 3.1.1 1 of the DBFL Civil Engineering Design Note, 260024-X-X-XXX-RP-DBFL-CE-0001, as submitted, for information relating to proposed green roof buildup.

In terms of rationale regarding additional attenuation storage required within the development, please refer to Section 3.5 of the DBFL Civil Engineering Design Note, 260024-X-X-XXX-RP-DBFL-CE-0001, as submitted.

b) The applicant is also encouraged to explore improving SUDS features and reducing proposed underground attenuation tanks, where feasible.

There is a significant increase in surface-based SuDS structures proposed including permeable paving, tree pits and bioretention areas throughout. For more information, please refer to Section 3 of the DBFL Civil Engineering Design Note, 260024-X-X-XXX-RP-DBFL-CE-0001, and DBFL's Proposed Surface Water Strategy, 260024-91-Z00-DTM-DR-DBFL-CE-1350 & Surface Water Drainage Layout, 260024-91-Z00-DTM-DR-DBFL-CE-1330, respectively, as submitted.

c) The applicant is requested to ensure there are no inconsistencies between the Architectural, Engineering and Landscape drawing sets.

The pack as submitted for planning has been reviewed to ensure there are no inconsistencies.

d) There are concerns regarding the proposed taking-in-charge boundary and demarcation, particularly in relation to the potential for public footpath areas to drain into privately managed lands. Clarification is also required regarding the drainage proposals along the Old Naas Road, where certain amendments appear to incorporate Phase 1 drainage infrastructure. The Applicant is requested to clearly identify and explain the direction of pipework draining towards Block E2 and to provide comprehensive details regarding drainage responsibilities and the interface between public and private drainage infrastructure.

Please refer to Section 3.6 of DBFL's Civil Engineering Design Note, 260024-X-X-XXX-RP-DBFL-CE-0001, and DBFL's Proposed Surface Water Drainage Layout, 260024-91-Z00-DTM-DR-DBFL-CE-1330, as submitted, for further information regarding the interface between private and public infrastructure proposed.

The drainage strategy of the incorporation of Phase 1 including Block E2 is further detailed in Section 3.2 of the DBFL Civil Engineering Design Note, 260024-X-X-XXX-RP-DBFL-CE-0001 and DBFL's Proposed Surface Water Drainage Layout, 260024-91-Z00-DTM-DR-DBFL-CE-1330, as submitted.

e) The Applicant is advised to contact the Drainage Division prior to the submission of the planning application regarding the proposed new surface water sewer on the Old Naas Road. Details regarding demarcation, ownership and maintenance responsibilities for public and private drainage infrastructure should be clarified and agreed.

A meeting was held between DBFL and the Drainage Division prior to the lodgement of this planning application to discuss the items contained in the LRD Opinion. For further information regarding the taking-in-charge strategy and demarcation of public surface water infrastructure, including the diversion and realignment of surface water infrastructure within Old Naas Road, please refer to Section 3.6 of the DBFL Civil Engineering Design Note (260024-

X-X-XXX-RP-DBFL-CE-0001) and the DBFL Proposed Surface Water Drainage Layout, 260024-91-Z00-DTM-DR-DBFL-CE-1330, as submitted.

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.