

Large-Scale
residential
Planning
Application to
Dun Laoghaire-
Rathdown
County Council

Planning
Application
Report &
Statement of
Consistency

Proposed Large-scale
Residential
Development including
271no. dwellings, 1no.
creche & site works.

At lands in the
townland of Old
Connaught, County
Dublin.

For Castlethorn Old
Conna ULC

JULY 2026

Document Control: -

Author	Checked by	Purpose	Date
	Richard Kealey	Draft	29.06.2026
	Richard Kealey	Final Draft	09.07.2026
Richard Kealey		Final	30.07.2026

TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	DEFINITION OF LARGE-SCALE RESIDENTIAL DEVELOPMENT	2
1.2	PROPOSED DEVELOPMENT	4
1.3	GENERAL	4
1.4	BRIEF DESCRIPTION OF DEVELOPMENT	4
1.5	RESIDENTIAL LAND USE ZONING	5
2	SITE DESCRIPTION & CONTEXT	7
2.1	SITE DESCRIPTION	7
2.2	EXISTING & PLANNED USES.....	7
2.3	PUBLIC TRANSPORT ACCESSIBILITY.....	8
2.3.1	Green Luas Extension to Bray	8
2.3.2	BusConnects.....	8
2.4	RECENT PLANNING HISTORY.....	9
2.4.1	Application Site (Housing Lands).....	9
2.4.2	Council lands to the north of Old Connaught Avenue	9
2.4.3	Walcot Cottages, Old Connaught Avenue (DLRCC Reg. Ref. S179A/H/04-2024)	9
3	THE APPLICANT	10
4	APPLICANT’S LEGAL INTEREST	10
4.1	OWNERSHIP AND LETTER OF CONSENT	10
5	AGENT.....	10
6	PRIOR CONSULTATION IN RESPECT OF PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT	12
6.1	SECTION 247 CONSULTATIONS WITH DÚN LAOGHAIRE-RATHDOWN COUNTY COUNCIL	12
6.2	SITE VISIT	14
6.3	SECTION 32B STAGE 2 LARGE SCALE RESIDENTIAL DEVELOPMENT MEETING	14
6.4	OTHER CONSULTATION WITH COUNCIL DEPARTMENTS DEVELOPMENTS	16
6.4.1	DLRC Transportation	16
6.4.2	DLRC Biodiversity	17
6.5	PRESCRIBED BODIES.....	17
6.5.1	Uisce Eireann.....	17
6.5.2	Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA)	17
7	PARTICULARS OF THE PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT	18
7.1	PROPOSED RESIDENTIAL DEVELOPMENT	18
7.2	RESIDENTIAL DENSITY	20
7.3	LANDSCAPE PROPOSALS	20
7.4	WATER SERVICES	21
7.4.1	Wastewater.....	21
7.4.2	Surface Water Drainage	21
7.4.3	Site Specific Flood Risk Assessment	22
7.5	TRANSPORTATION	22
7.5.1	Access.....	22
7.5.2	Car Parking	22
7.5.3	Bicycle Parking.....	23
7.6	PUBLIC LIGHTING & SITE SERVICES	23
7.7	CHILDCARE/COMMUNITY FACILITY	23
7.8	PART V.....	24
7.9	ARCHAEOLOGY	24
7.10	DAYLIGHT/SUNLIGHT	25
7.11	SUSTAINABILITY & ENERGY STATEMENT	25
7.12	TAKING IN CHARGE	25
7.13	CONSTRUCTION & ENVIRONMENTAL MANAGEMENT PLAN	25

7.14	WASTE MANAGEMENT	26
8	STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY	27
9	STATUTORY PLANNING CONTEXT	28
9.1	DÚN LAOGHAIRE-RATHDOWN COUNTY DEVELOPMENT PLAN 2022 – 2028	28
9.1.1	Planning for Growth, Core Strategy & Settlement Strategy	28
9.1.2	Land Use Zoning.....	30
9.1.3	Proposed Variation No.1 – Residential Mix	31
9.1.4	Specific Local Objective	32
9.1.5	Map Based Objectives.....	33
9.1.5.1	Local Area Plan.....	33
9.1.5.2	Proposed Luas Extension	33
9.1.5.3	Tress and Woodland Preservation.....	33
9.1.6	Residential Density.....	33
9.1.7	Climate Action	37
9.1.8	Apartment Design Standards	38
9.1.8.1	Internal & External Storage	38
9.1.8.2	Minimum Apartment Floor Area	39
9.1.9	People, Homes and Place.....	40
9.1.10	Transport.....	41
9.1.11	Part V.....	43
9.1.12	Public Lighting	43
9.1.13	Green Infrastructure and Biodiversity	44
9.1.14	Public Open Space	45
9.1.15	Environmental Infrastructure and Flood Risk	46
9.2	OLD CONNAUGHT LOCAL AREA PLAN 2025.....	47
9.2.1	Phasing Requirement of Local Authority Plan – Pump Station Provision.....	47
9.2.2	Old Connaught LAP Objectives.....	49
10	SCREENING FOR APPROPRIATE ASSESSMENT.....	65
11	ENVIRONMENTAL IMPACT ASSESSMENT REPORT	65
12	CONCLUSION	65
13	ENCLOSURES	67
14	APPENDIX A – STATEMENT OF CONSISTENCY	69

1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26/27 Upper Pembroke Street, Dublin 2, are instructed by our Client (the Applicant), Castlethorn Old Connaught ULC, Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, to prepare this Planning Application Report & Statement of Consistency to accompany this planning application for Large-scale Residential Development (LRD).

The planning application is for Large-scale Residential Development (LRD) on a site measuring c.6.9 hectares, at lands generally bounded by Old Connaught Avenue to the south, agricultural lands to the north, the M11 to the east and Festina Lente equestrian centre to the west. The proposed development is referred to as **Old Connaught Phase A1**.

The proposed development comprises **271no. dwellings**, in a mix of 2-3 storey houses (103no.) and apartment and duplex units (168no.) in 4no. blocks ranging from 1-5 storeys, 1no. creche unit (c.574 sq m), and all associated and ancillary site development, landscape and boundary treatment works.

Associated and ancillary site development, infrastructure and landscape works, include surface water attenuation pond, public and private communal amenity open spaces, new vehicular site access from Old Connaught Avenue and new local road network, LUAS reservation corridor, car parking, bicycle parking, motorbike parking, ancillary stores and ESB substations.

The proposed development also includes the construction of a new pumping station, twin rising mains extending c.400m along Old Connaught Avenue to connect to the existing gravity foul network on Old Connaught Avenue c.125m east of the M11 bridge, and associated storage, together with all associated enabling site development and reinstatement works.

The scheme is conceived in accordance with the **Old Connaught Local Area Plan 2025**.

This LRD proposal represents **Phase 1A** of the development of lands within the wider 'Centre Character Area' of Old Connaught. The enclosed Site Layout Plan, prepared by O'Mahony Pike Architects, shows the red line extent of the application site.

Additionally, O'Mahony Pike Architects drawing 24004-OMP-00-SP-DR-A-1100 contains a masterplan for all adjacent lands within our client's ownership (blue line area on Site Location Map). This provides an indication of how the proposed Phase 1A development will integrate with the future wider development of adjacent land in subsequent phases. The indicative Masterplan is prepared in accordance with the requirements of section 4.4.2 of the Old Connaught LAP.

An Appropriate Assessment Report and Ecological Impact Assessment Report, both prepared by Brady Shipman Martin Built Environment Consultants, and an Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants, have been prepared in respect of the proposed development and accompany this application.

This LRD Planning Application Report sets out how, in our opinion, the proposed scheme complies with the proper planning and development of the area in the context of the relevant strategic and local planning policy, as primarily expressed in:-

- Climate Action Plan 2025
- National Sustainable Mobility Action Policy 2026-2030
- Delivering Homes, Building Communities 2025-2030
- First Revision to the National Planning framework, Ireland 2040 (April 2025)
- Eastern & Midlands Regional Spatial & Economic Strategy and Dublin Metropolitan Area Spatial Plan 2019-2031
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)
- Design Standards for Apartments Guidelines for Planning Authorities (2025)
- Draft Planning Design Standards for Apartments National Planning Statement (2026)
- Urban Development and Building Height Guidelines (2018)
- Quality Housing for Sustainable Communities (2007)
- The Planning System and Flood Risk Management (2009)
- Design Manual for Urban Roads & Spaces (2019)

- Childcare Facilities, Guidelines for Planning Authorities (2001)
- Dun Laoghaire-Rathdown Development Plan 2022-2028 (as varied)
- Old Connaught Local Area Plan (2025)
- Other relevant national and regional planning strategies, objectives and planning design guidelines for achieving sustainable urban residential development in the Greater Dublin Area.

This Report should be read in conjunction with the plans and particulars that accompany the LRD planning application. See Section 13 for Enclosures and the schedule of drawings and documents prepared by the application consultants.

A dedicated website has been set up at: www.OldConnaughtPhaseA1LRD.ie to facilitate inspection of the plans and particulars that make up the LRD planning application.

This application has been prepared by a design team comprising: -

- O'Mahony Pike Architects
- AtkinsRéalis Consulting Engineering
- Brady Shipman Martin Landscape Architects & Environmental Consultants
- Irish Archaeological Consultancy Limited
- The Tree File Limited
- Delap and Waller Mechanical and Electrical Building Services Engineers
- ModelWorks
- Jensen Hughes Fire Protection Consultants
- Traynor Environmental
- AWN Consulting
- IES Ltd (Integrated Environmental Solutions)
- Sabre Electrical Services Ltd
- Stephen Little & Associates, Chartered Town Planners and Development Consultants.

In accordance with the statutory Regulations, we confirm that an electronic fund transfer to the sum of **€39,362.80** has been made to Dún Laoghaire-Rathdown County Council as the appropriate fee in this instance [(271 no. units x €130) + (€7.20 per square metre (x 574sq/m) to a maximum of €32,400 for creche building) = €35,230 + €4,132.80 = €39,362.80). Proof of payment is enclosed.

The LRD Application Form (Form 19) associated with this stage of the LRD Application Process has been completed and is enclosed herewith.

A complete list of enclosures with this application can be found at Section 13 of this Report.

A section 32(B) LRD Pre-Planning Meeting with Dun Laoghaire Rathdown County Council was held on 26 March 2026. We refer the Planning Authority to the enclosed **LRD Opinion Response Report**, prepared by Stephen Little & Associates with input from the expert design team, which provides a detailed response to the items raised within the planning authority's LRD Opinion dated 22 April 2026.

1.1 Definition of Large-scale Residential Development

We consider the development proposed to be LRD as defined by the Section 2 of the Planning & Development (Amendment) (Large-scale Residential Development) Act 2021.

Section 2 of the Act confirms, *inter alia*, that: -

“ ‘LRD’ means large-scale residential development;

...

‘large-scale residential development’ means a development that includes -

- (a) the **development of 100 or more houses**,*
- (b) the development of student accommodation that includes 200 or more bed spaces,*
- (c) both the development of 100 or more houses and of student accommodation*
- (d) both the development of student accommodation that includes 200 or more bed spaces and of houses.*

‘LRD floor space’, in relation to a building or part of a building, means the area ascertained by the internal measurement of the floor space on each floor of a building or part of a building (including internal walls and partitions), disregarding any floor space provided for—

- (a) the parking of vehicles by persons –*
- (b) occupying or using the building or the part of the building,*
- (c) for a purpose incidental to the primary purpose of the building or part of the building,*
and
- (d) ancillary residential services, including gyms and child-care facilities;*

where the LRD floor space is -

- (i) in the case of paragraph (a), the buildings comprising the house,*
- (ii) in the case of paragraph (b), the student accommodation,*
- (iii) in the case of paragraphs (c) and (d), the buildings comprising the development*

is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;

The proposed development comprises of 271no. dwellings and is therefore in excess of the LRD 100no. unit threshold.

Save for a creche building (c.574 sq m) at ground floor level of apartment Block 3, all floorspace is residential. As such, this scheme also exceeds the minimum 70% residential floor space threshold.

We therefore submit that the development is a Large-scale Residential Development, having regard to the above terms.

We can also confirm that all of the proposed dwellings are on lands zoned under the Dún Laoghaire-Rathdown County Development Plan 2022-2028, as varied, as:

“Objective A1: To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans or approved Framework Plans.”

The A1 New Residential zoning of these lands is also confirmed in the Old Connaught Local Area Plan 2025.

LRD Consultation

We can confirm that:

- A Section 247 Pre-Planning Consultation meeting (LRD Stage 1) took place on 11 December 2025, in the DLRC Council offices.
- A site visit with the Planning Authority took place on 21 January 2026.
- An LRD Stage 2 Meeting took place with the Planning Authority on 26 March 2026, in the DLRC Council offices.
- The Planning Authority issued its LRD Opinion Response under reference PAC/LRD2/002/26 on 22 April 2026.

Planning Application Drawings

The enclosed planning application drawings have been screened by this office for consistency with the Planning & Development Regulations 2001, as amended.

Statutory Notice

In accordance with Article 18(1)(d)(iv) of the Regulations, the statutory planning notice (site notice and newspaper notice) includes confirmation that the planning application is a LRD. It also includes a website address where the application can be viewed by the public at www.OldConnaughtPhaseA1LRD.ie.

The contents of this Report and the enclosed documents address the provisions of the Planning and Development (Large-scale Residential Development) Regulations 2021 as stated above.

Section 13 of this Report provides the Planning Authority with a comprehensive list of the material enclosed with this consultation request.

1.2 Proposed Development

1.3 General

The proposed development site identified in this report as ‘Old Connaught’, refers to the zoned residential lands west of M11, subject of the Old Connaught Local Area Plan 2025. The application site is zoned ‘A1 – Residential’ in the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028.

The application site is situated on the lands identified as Phase A, Sub-Phase 1 by the Old Connaught LAP. The LAP provides for a bridge crossing adjacent the M11, road and active travel facilities, and also seeks to accommodate a reservation line for a future Luas line along the alignment of the main ‘North-South link road, which connects Old Connaught Avenue and Crinken Lane/ Ballybride Road.

The proposed development will provide significant supporting infrastructure including the main north-south thoroughfare, associated active travel, wastewater network connection and attenuation measures. As identified in table 11.1 of the LAP ‘Infrastructure Phasing Table’, the partial delivery of supporting infrastructure is required within ‘Sub-Phase 1’ and this is reflective of the proposed development. The North-South link road, LUAS reservation corridor, foul water pumping station and elements of the regional attenuation pond will serve the wider LAP area and represent some of the key infrastructure needed to develop further zoned lands in the area, which will unlock new housing in accordance with the LAP.

A reservation corridor of c.7m is proposed along the North-South link road to facilitate the delivery of a future LUAS tram line. To the east of the site boundary includes a strategic road reservation along the M/N11.

1.4 Brief Description of Development

The proposed development comprises **271no. dwellings**, in a mix of houses, duplex units and apartments, **1no. creche** (c.574 sq m), and all associated and ancillary site development, landscape and boundary treatment works.

The proposed housing mix comprises:

103no. houses (22no. 4-bed, 68no. 3-bed and 13no. 2-bed) ranging from 2 to 3 storeys.

168no. apartments and duplexes (6no. Duplex 3 bed, 113no. 2-bed and 49no. 1-bed) accommodated in a terrace and 4no apartment blocks, including: -

- **Block 1:** 54no. apartments total (19no. 1-bed, 4no. 2-bed (3-person), 25no. 2-bed (4-person)) in 1no. 1 to 5-storey building and 6no. 3-bed duplex units in a 3-storey terrace.
- **Block 2:** 41no. apartments total (9no. 1-bed, 9no. 2-bed (3-person), 23no. 2-bed (4-person)) in 1no. 1 to 5-storey building.
- **Block 3:** 38no. apartments total (13no. 1-bed, 11no. 2-bed (3-person), 14no. 2-bed (4-person)) and the ground floor creche (574 sqm) with associated outdoor play area (c.225.4 sq m), in 1no. 1 to 5-storey building.
- **Block 4:** 35no. apartments total (8no. 1-bed, 11no. 2-bed (3-person), 16no. 2-bed (4-person)) in 1no. 1 to 4-storey building.

Associated and ancillary site development and infrastructure work, include:

On-site attenuation; hard and soft landscaping and boundary treatment works including **public open space (totalling 4,519sq/m)** in 2 areas identified as POS1 (1,232sq/m) and POS2 (3,287 sq/m) incorporating the existing veteran Oak tree to be retained; **communal open space (totalling 1,154sq/m)** in 3 areas identified as COS1 (253 sq/m), COS (723 sq/m) and COS3 (178sq/m); components of the regional attenuation pond to the north east of the site; 5no. ESB substations. Vehicular site access from Old Connaught Avenue, via a proposed new primary North-South street that includes active travel infrastructure and a 7m wide LUAS reservation corridor running parallel to the east of the primary North-South street. A section of the East-West link road, including active travel, will also be provided for along the northern boundary of the site. A total of **289no. car parking** spaces including 241no. surface spaces (inclusive of 11no. visitor car parking spaces, 2no. ESB spaces, 2no. Go-Car shared spaces and 9no disabled spaces) and 48no. undercroft spaces (inclusive of 2no. disabled spaces), 20% of residential car parking spaces equipped with Electric Vehicle charging points. **435no. bicycle parking spaces**, including 351no. resident spaces and 84no. visitor spaces. 12no. motor bicycle parking spaces., Ancillary stores serving the houses, duplex units and apartments.

The proposed development includes the construction of a new pumping station and associated single storey building and ESB substation, twin rising mains extending c.400m along Old Connaught Avenue to connect to the existing gravity foul network on Old Connaught Avenue c.125m east of the M11 bridge, and associated storage, together with all associated enabling site development and reinstatement works.

1.5 Residential Land Use Zoning

The proposed housing development is located within lands zoned “A1 – New Residential” under the Dún Laoghaire-Rathdown County Development Plan 2022-2028, as varied.

The text of Objective A1 was amended under Variation No.1 of the Development Plan to read:

*“To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans **or approved Framework Plans.**”*

[SLA bold text identifies text inserted under Variation no.1]

The Objective A1 New Residential zoning is also confirmed by the Old Connaught Local Area Plan 2025.

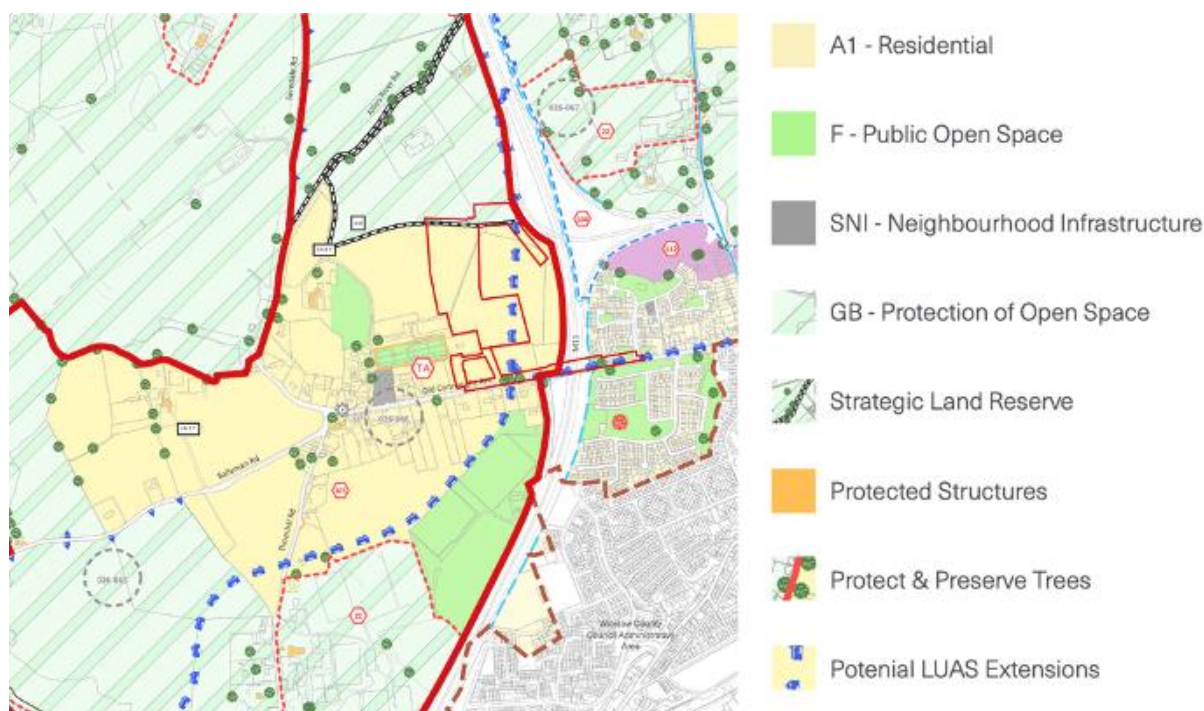


Figure 1: Extract from DLRC County Development Plan 2022-2028 Map 14, with application site outlined indicatively in red (SLA overlay). Refer to Site Location Plan submitted with the application for definitive red line.



Figure 2: Extract from Proposed Site Layout Plan prepared by O'Mahony Pike Architects.

As the proposed development is for greater than 100no. dwellings and that development is located on land zoned for residential development, the proposal amounts to Large-scale Residential Development (LRD).

For all of the reasons and considerations noted above, we are of the professional opinion that the proposal before Dún Laoghaire-Rathdown County Council represents Large-scale Residential Development and is situated on suitably zoned lands.

2 SITE DESCRIPTION & CONTEXT

2.1 Site Description

The proposed development at this application site represents the first phase of a plan-led phased development within the development boundary of the Old Connaught Local Area Plan 2025.

The site is located in the Townland of Old Connaught, Co. Dublin. The lands are generally bound by agricultural lands to the north, the M11 to the east, Old Connaught Avenue to the south, and Festina Lente equestrian centre to the west.

The proposed development includes 271 no. dwellings, a creche and the necessary infrastructure to deliver a sustainable new residential neighbourhood.

The gross site area, including regional site infrastructure works, measures c.6.9 ha. The net site area is c.3.6 ha.



Figure 3: Extract from Google Maps showing the extent of the application site outlined in red (Overlay by SLA). See Site Location Map prepared by OMP Architects for the more detailed red line boundary of the application site.

2.2 Existing & Planned Uses

The majority of the application site consists of greenfield, agricultural lands.

There are no protected structures within the site.

5no. protected structures are located within c. 500m of the site, including: -

Location	RMP No. & RPS No.	Classification
Old Connaught Avenue	026-066001	Church
Old Connaught Avenue	026-066002 & 1880	Graveyard
Old Connaught Avenue	026-067	Burial
Old Connaught Avenue	1875	House
Old Connaught Avenue	1876	Walled Garden

Table 1: Protected Structures within the wider environs of the application site

2.3 Public Transport Accessibility

2.3.1 Green Luas Extension to Bray

Included in the Transport Strategy for the GDA (2022 -2042), and of particular relevance to Old Connaught, is provision for the extension of the Luas Green Line southwards to serve the Bray and Environs area.

This proposed extension has an indicative route alignment transecting the subject site from North to South. This is indicated as a 7m LUAS reserve corridor, in accordance with NTA requirements, in **Drawing No. 24004-OMP-00-SP-DR-A-1000 – proposed Site Location Map, prepared by O’ Mahony Pike Architects.**

We refer the Planning Authority to the **Traffic and Transport Assessment prepared by Atkins** for further design details on the Green Luas Extension corridor that extends through the application site.

2.3.2 BusConnects

BusConnects is the National Transport Authority’s (NTA) programme to greatly improve bus and sustainable transport services. The aim of Bus Connects is to deliver an enhanced bus system that is better for the city, its people, and the environment. This project will augment accessible bus travel, increased service frequency and a more easily navigable bus system for origins and destinations along routes with growing populations.

For the routes in operation, urban bus service reliability, capacity and frequency will be enhanced as part of planned and approved BusConnects implementation along the local road network. This will strengthening the application site’s access to high quality, capacity and frequent public transport.

The following BusConnects spine and local routes serve the area:-

Route No.	Destinations	Available From (Nearest Stop)
E1	Ballywaltrim - Northwood	4201,4129
L11	Kilmacanogue – Dun Laoghaire	4201,4129
L14	Southern Cross - Cherrywood	4201,4129
X1	Kilcoole - Dublin City South Hawkins Street	Old Connaught Avenue Bus Stop
X2	Newcastle - Dublin City South Hawkins Street	Old Connaught Avenue Bus Stop

Table 2: BusConnects spine and local bus routes serving the proposed development

The current bus routes provide convenient and frequent access from the Old Dublin Road (R119) to Dublin City Centre and provide access to the wider DART network via Bray or Dun Laoghaire.



Figure 4: Extract from Bus Connects proposals with application site indicated by yellow star (Overlay by SLA). (Source: BusConnects.ie)

2.4 Recent Planning History

The following is an outline of the relevant, recent planning history of the subject site.

2.4.1 Application Site (Housing Lands)

There is no recent planning history recorded for the application site proper.

2.4.2 Council lands to the north of Old Connaught Avenue

As part of this LRD application, it is proposed to include the construction of new vehicular access to Old Connaught Avenue to the south and the construction of a new pumping station, twin rising mains extending c.400m along Old Connaught Avenue to connect to the existing gravity foul network on Old Connaught Avenue c.125m east of the M11 bridge, and associated storage, together with all associated enabling site development and reinstatement works.

As this part of the development is not on lands within the ownership of the applicant, we refer the Planning Authority to the Letter of Consent issued 28.07.2026 from DLR County Council.

2.4.3 Walcot Cottages, Old Connaught Avenue (DLRCC Reg. Ref. S179A/H/04-2024)

Permission was sought by Dún Laoghaire-Rathdown County Council on 8 October 2024 for a Section 179 planning scheme, comprising an extension to an existing Traveler Accommodation site, amounting to 6no. houses.

It has been subsequently confirmed by DLRCC to our client that this project is no longer being pursued.

3 THE APPLICANT

We wish to confirm that the Applicant in this case is Castlethorn, the required details of which are as follows: -

Name: Castlethorn Old Conna ULC

Address: Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6

Telephone: 01 2164060

Email: info@castlethorn.ie

4 APPLICANT'S LEGAL INTEREST

4.1 Ownership and Letter of Consent

The Applicant does not own and is not in control of the entirety of the application site subject of the proposed development in this instance.

A portion of the southern lands, subject of the proposed new vehicular access to Old Connaught Avenue and the proposed pumping station and rising mains works, are outside the Applicant's ownership. It is understood that these lands are controlled by Dún Laoghaire-Rathdown County Council, which in turn afford access to the public highway; Old Connaught Avenue.

A letter of consent has been obtained from the Council dated 28/07/2026 and accompanies this application.

We note that the Consent Area drawing that accompanied the requested letter of consent pertained to both the permanent rising mains under the M11 and a potential interim rising mains within the bridge deck of Old Connaught Avenue, which is a confirmed TII structure. This potential interim rising mains was investigated and was considered not to be feasible and/or the optimum solution. This potential route has thus not been included in this instant planning application, and it has been confirmed through contact with TII that the M11 corridor at this location is in the ownership of DLRCC. It has therefore been concluded that only a letter of consent from DLRCC is required for the purpose of making this planning application, as stated in the Application Form and as attached with this application.

5 AGENT

This LRD Application has been co-ordinated by Stephen Little & Associates, Chartered Town Planners and Development Consultants, under a Design Team led by O'Mahony Pike Architects.

Details of the agent are set out below for the convenience of the Planning Authority and we would request that all future correspondence is issued to this agent: –

Name: Stephen Little & Associates, Chartered Town Planners & Development Consultants.

Address: 26/27 Upper Pembroke Street, Dublin 2 D02 X361.

Telephone: 01-676 65 07.

Email: info@sla-pdc.com.

The following sets out a list of consultants that have been involved in the preparation of this LRD planning application: -

- **O'Mahony Pike Architects** – Project architects responsible for the preparation of the detailed layout and design of the Proposed Development.
- **AtkinsRéalis Consulting Engineers** – Provision of guidance on road and drainage design, flooding and other infrastructural requirements of the Proposed Development.

- **Brady Shipman Martin Landscape Architects and Environmental Consultants** – Preparation of the landscape masterplan. Preparation of an Appropriate Assessment Screening (with additional specialist input) and Ecological Impact Assessment report.
- **The Tree File** – Arboricultural Report, tree survey and hedgerow survey.
- **Model Works** – Preparation of Daylight/Sunlight Analysis (preliminary assessment) and CGI's.
- **Delap and Waller Ltd** – Energy and Sustainability Statement.
- **AWN Consulting Engineers** – Construction Environmental Management Plans, Resource Waste Management Plan and Operational Waste Management Plan
- **IAC** –Provision of guidance on the Archaeological constraints and technical note on Archaeological, Architectural and Cultural Heritage report
- **Castlethorn** – Building Life Cycle Report and Public Liaison Plan
- **Traynor Environmental Ltd** – Noise Impact Assessment
- **Integrated Environmental Solutions** – Wind and Microclimate Assessment
- **Stephen Little & Associates Chartered Town Planners & Development Consultants** – Provision of guidance from a town planning perspective. Preparation of Town Planning Report including Statement of Consistency (Appendix A), EIAR Screening Report and Opinion Response

Section 13 of this Report identifies the LRD application enclosures. Further schedules of plans and particulars are submitted by the design team consultants with their planning packs.

6 PRIOR CONSULTATION IN RESPECT OF PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT

6.1 Section 247 Consultations with Dún Laoghaire-Rathdown County Council

We can confirm that a Section 247 Pre-Planning Meeting was held with the Planning Authority on 11 December 2025, as required under Section 32B(1) of the Planning & Development Act 2000, as amended.

This meeting was attended by the following officials of the Planning Authority: -

- Miguel Sarabia, Senior Planner
- Naoimh Fleming, Senior Executive Planner
- Maeve Cronin, Executive Planner
- Tom Kilbride, Transportation Planning
- Joao Brescia, Water & Drainage
- Dara O'Daly, Parks Department

The following is a summary of the main points raised during the s.247 pre-planning consultation: -

- **Architecture:**
 - Support for 'Block 3' building height to 5 storeys, as strong corner element in the scheme.
 - The Central land, which is to the west of the main route, is subject to a density of 50-80 dph as per the LAP.
 - The application to include a phasing schedule and an overall masterplan.
 - Expressed preference for the proposed apartment buildings fronting the north south spine road and Luas reservation, to create a stronger urban edge, and for proposed houses to be set back behind.
 - To reconsider the parking at the main open space area and parking at the southern edge of the public open space.
- **Green Infrastructure & Biodiversity:**
 - Tree planting can be used to slow traffic on the main N-S link.
 - Consider taller corner unit in the north.
 - The active travel route will be a very important link and there is precedent in the county for 5m width for same. (The Parks and Transportation Planning sections agreed to discuss further if the width should be 4m or 5m).
 - Advised to be cognisant of Taking in Charge requirements and to include Taking in Charge drawings.
- **Water Services:**
 - Applicant advised to engage with the DLRC drainage department.
- **Transport:**
 - Applicant advised to liaise with the TII in relation to the Luas and the Luas reservation.
 - The applicant is to have consideration for Universal Design requirements and visually impaired users.
 - Advised to limit crossings on the active travel carriageways.
 - DLRC Active Travel section requested to make the main N/S route more user friendly, possibly increasing the width of the cycle tracks to 2.5metres.
 - No objection to the car parking numbers in principle.

- Satisfied with the cycle parking numbers. No objection to proposed cycle storage in rear gardens of the houses.
 - Consider a 6-metre width on the main carriageway. (See also Transportation and Parks comments on carriageway width above)
 - Consider a link for the residents of the townhouses to get to Old Connaught Avenue.
 - The applicant should have special consideration for how the main N-S connection will link with Old Connaught Avenue.
- **Planning:**
 - The applicant should have consideration for encroachment onto the public open spaces.
 - The applicant should be cognisant of the protected structure/walled garden.
 - Noted that the conservation officer currently has no objections regarding the protected structure.
 - The applicant should provide details of how waste management will be managed in the development.
 - The applicant should provide a wind assessment for rooftops and areas where appropriate on site.
 - The applicant should consider noise attenuation measures along the Luas.
 - The applicant should be aware of 16m separation distance between directly opposing windows.
- **Pumping Station Location**
 - Senior planner noted that it was intended for the pumping station to be located on the west end of the Local Authority land. This is currently with Uisce Éireann for consideration, so cannot yet be confirmed.
 - DLRC agreed to share details of the currently proposed location and drawings of the pumping station.
- **A separate Biodiversity consultation report was issued, which noted the following:**
 - Applicant's Consultant Ecologist to be present at LRD application pre-planning consultation meetings with DLR should they arise.
 - An EclA report prepared in accordance with the CIEEM guidelines for ecological assessment (CIEEM, September 2024) is required to be submitted with the final planning application.
 - No EIAR being prepared as the proposed development is sub threshold. (Please refer to section 11 of this report for EIA Screening).
 - The AA Screening Report / NIS prepared in accordance with current national and EU guidance will be submitted with the planning application.
 - It is requested that the landscape architect liaises with the ecologist in respect of important biodiversity enhancement measures including 'native planting', green roofing, biodiversity refuges, protection/enhancement features and ecological connections/corridors.
 - It is requested that opportunities for 'dark zones' (wildlife refuges) are explored along the site boundaries and/or areas of retained hedgerow, woodland, reelines and vegetation.
 - A concerted effort to protect and enhance hedgerows along all site boundaries should be given all due consideration and included in the site's landscape plan.
 - It is requested that the lighting design engineer will liaise with the ecological specialists (including bat and non-volant mammal specialists), in respect of outdoor lighting.
 - Details of surface water flow must be provided both for temporary surface water drainage during construction and any SUDS features planned for the operational phase of the site's development.
 - Hydrogeological assessments shall be conducted to assess potential impacts on groundwater and groundwater dependent terrestrial habitats (where relevant).

- A survey will be carried out to determine the presence or otherwise of any invasive plant species, including for Giant Hogweed, which is known to occur in the area.
- An Invasive species management plan drawn up by an invasive species specialist is requested to be submitted with the planning application if any invasive species are found to occur.
- All mitigation and enhancement measures in respect of biodiversity, as set out in the EclA are to be included in full within the Construction Environmental Management Plan (CEMP).
- A monitoring programme, as appropriate, in respect of these measures is to be included in the EclA, the CEMP and the Operations Environmental Management Plan (OEMP).
- The EclA/any EIAR shall align with all relevant Biodiversity Policies and Specific Local Objectives within the County Development Plan.
- The EclA/any EIAR will align with all relevant biodiversity and green infrastructure policies with the Old Connaught Local Area Plan.

The proposal subject of this LRD application has had full regard to the issues raised by the Planning Authority at pre-planning consultation stage.

We acknowledge the ‘wholly without prejudice’ nature of these Pre-Planning Consultations.

6.2 Site visit

A site visit was conducted with the Planning Authority and Design Team consultants on 21st January 2026.

6.3 Section 32B Stage 2 Large Scale Residential Development Meeting

We confirm that a LRD Meeting (stage 2) was held with the Planning Authority on 26 March 2026, as required under Section 32B of the Planning & Development Act 2000, as amended. Pre-Planning Reference Number PAC/LRD2/002/26 refers.

This meeting was attended by the following officials of the Planning Authority in the New Council Chamber, County Hall, Marine Road: -

- Miguel Sarabia, Senior Planner
- Naoimh Fleming, Senior Executive Planner
- Maeve Cronin, Executive Planner
- Tom Kilbride, Transportation Planning
- Johanne Codd, Water & Drainage
- Dara O’Daly, Parks Department
- Martina O’Brien, Parks
- Brendan Lynch, Planning Secretariat
- Sam Geoghegan, Planning Secretariat
- Lucy McGrath, Housing Part V
- Omar Coughlin, Environment and Climate Change

The following is a summary of the main points raised during the pre-planning meeting: -

- **Water Services / Pumping Station:**
 - The pumping station location remains unresolved, with Uisce Éireann yet to agree the location or detail; the Planning Authority noted its own Part 8 project is dependent on confirmation from UE.

- The applicant has applied to UE for foul network/water supply and confirmed at that time that the red line would run up to, but not include, the pumping station site. (Note that this infrastructure now included as proposed development within the red line application site.)
 - The Planning Authority will review whether permission should be granted in tandem with, or following, delivery of the pumping station, and will include any available update in the opinion report.
 - The SUDS strategy was noted as acceptable, though all sites should be self-attenuating and the applicant agreed to further review individual attenuation requirements.
 - The applicant agreed to provide updated flood mapping and to engage further with the Planning Authority's Water and Drainage Department.
- **Connections, Density and Residential Standards:**
 - The Planning Authority emphasised the importance of high-quality connections to adjoining lands, including lands to the east and DLR lands to the south, with connections to comply with the LAP.
 - The Planning Authority raised concerns regarding the current north-south road location, including tree loss, segregated open space and NTA reservations, and asked the applicant to review alternative layouts and innovative connections.
 - The applicant was advised to clarify the density calculation in accordance with Appendix B of the Compact Settlement Guidelines, remove the creche from density calculations, and explain the net site area.
 - The Planning Authority advised that the County Development Plan standards take precedence and that bedroom sizes, storage, bulky storage and oversized apartment units should be reviewed.
- **Urban Design, Built Form and Phasing:**
 - The Planning Authority directed the applicant to the LAP urban design and placemaking guidance and noted the scheme would set an important precedent for Old Connaught.
 - Strong building frontages along the Luas reservation and primary north-south street were advised, with active frontages, front doors to streets and strong corner articulation, particularly at Block 3.
 - The Planning Authority raised concerns regarding balconies at Blocks 1 and 2, due to proximity to the Luas and potential amenity impacts.
 - It requested the applicant consider material changes to soften Block 3.
 - The applicant to consider bringing the creche forward to phase two and to provide appropriate phasing information.
- **Transport, Movement and Parking:**
 - NTA and TII comments are to be forwarded to the applicant, with further liaison required in relation to the Luas reservation and active travel provision.
 - The Planning Authority sought a coherent north-south link, 30km/h design speed, compliance with LAP connection standards, and implementation of desire lines and universal design.
 - The applicant to reconsider parallel parking along the north-south road, address shared-surface hazards, provide safe access to northern open space and review pedestrian/cycle access at the eastern block.
 - The Planning Authority noted the Part V team's requirement for one car space per unit at Block 3 and raised layout concerns regarding balconies and the creche interface.
- **Green Infrastructure, Biodiversity and Open Space:**
 - The applicant was advised to address LAP biodiversity requirements, protect and evaluate trees and hedgerows, use nature-based solutions, and assess potential for bats, badgers and foxes.

- The Planning Authority requested a creative approach to retaining the mature oak tree in the north of the site and noted the need to respect root protection areas, including at the eastern block.
 - The Planning Authority raised concerns that green spaces appeared disconnected from front doors and requested justification on the quality of open spaces, communal open space and roof terrace policy compliance.
 - Native planting was encouraged to reflect the rural heritage of the area, and boundary treatments should be detailed having regard to the rural context.
- **Environmental Assessments, Waste and Lighting:**
 - The Planning Authority requested an operational waste management plan, swept path analysis and supporting documentation confirming refuse truck access.
 - Noise and wind assessments were requested, including a baseline noise survey addressing construction, rock breaking, operational noise and inward noise impacts from the N11.
 - Details of the public lighting scheme are to be provided, with the applicant advised to liaise directly with the Council's public lighting representative.
- **Part V, Taking in Charge and AOB:**
 - The Part V obligation is 20%, with the number of units to be confirmed; DLR Housing indicated it would not want a communal roof garden for the Part V block.
 - Universal design should be incorporated into some units, and the PA remains available to discuss the Part V obligation further offline.
 - A Taking in Charge map and details are to be submitted.
 - The Planning Authority confirmed the opinion report would issue within four weeks and agreed to clarify how the pumping station should be addressed in the letter of consent.
 - The applicant confirmed EIA screening was submitted with the Stage 2 documentation and AA screening will be completed before application stage.
 - The Planning Authority requested further detail on cycle parking beside the creche, including levels and accessibility, and sought generous rear-garden access widths for non-standard bicycles.
 - The applicant noted that they are proposing to provide a secure building on each street for bicycle parking.

Following this largely positive LRD Stage 2 meeting, a formal written LRD Opinion was issued by the Planning Authority, dated 22/04/2026.

In accordance with the requirements of Section 32D(2)(a) and (b), the Planning Authority invited further/additional information in order to constitute a reasonable basis for making an LRD application, as well as the matters which, if addressed, could enable the documentation to meet that threshold.

Accordingly, we refer the Planning Authority to the **LRD Opinion Response prepared by Stephen Little & Associates**, which accompanies the application as a stand-alone report and responds in full to the LRD Opinion issued by the Planning Authority.

6.4 Other Consultation with Council Departments Developments

In addition to the above formal Pre-Planning Meetings, there were a number of informal consultation meetings held with officials from individual Council Departments throughout this LRD application process, which have informed the planning application plans and particulars.

6.4.1 DLRC Transportation

Atkins engaged with DLR Transportation Department and Drainage Department prior to this submission.

6.4.2 DLRC Biodiversity

BSM engaged with DLR Biodiversity Officer prior to this submission.

6.5 Prescribed Bodies

6.5.1 Uisce Eireann

AtkinsRéalis Consulting Engineers engaged with Uisce Eireann.

Confirmation of Feasibility (CoF) from Uisce Eireann, dated 18.02.2026 is enclosed with this LRD application. This CoF confirms that wastewater connection and water supply connections are feasible, subject to infrastructure updates. See **Appendix B** of the Engineering Planning Report.

A **Statement of Design Acceptance** from Uisce Eireann, dated 21/07/2026, accompanies this LRD Planning Application. See **Appendix E** of the Engineering Planning Report.

6.5.2 Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA)

AtkinsRéalis Consulting Engineers engaged with TII and the NTA. Feedback received from these prescribed bodies issued by the Planning Authority has informed the evolution of the road network layout, active travel infrastructure, street hierarchy and masterplan connections, to ensure alignment with regional transportation objectives and statutory guidance.

7 PARTICULARS OF THE PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT

The proposed development (Phase A1) will comprise generally of the following: -

- 271no. dwellings (103no. houses, 162no. apartments and 6no. duplex units) in buildings ranging from 1-5 storeys in height).
- Public open space (c.4,519 sq m).
- Creche in the ground floor of apartment Block 3 (c.574 sq m)
- A total of 289no. car parking spaces and 435no. bicycle parking spaces.
- New vehicular site access, road and active travel network extending from Old Connaught Avenue.
- LUAS reservation corridor to the east of the proposed North-South link road.
- All associated and ancillary site development, infrastructural, landscaping and boundary treatment works.
- Construction of a new pumping station, twin rising mains extending c. 400m along Old Connaught Avenue to connect to the existing gravity foul network on Old Connaught Avenue c.125m east of the M11 bridge and associated storage, together with associated site enabling and reinstatement works required to facilitate this infrastructure.

Key Site Statistics	
Total Number of Units	271no.
Gross Floor Area (Residential only)	c.11,221.8 sq m
Gross Site Area	c.6.9 ha
Net Site Area	c.3.6 ha
Net Density	76.2 dph
Unit/Residential Mix	1 Bed Apartment: 49no. 2 Bed Apartment (3P): 35no. 2 Bed Apartment (4P): 78no. 3 Bed Duplex (5P): 6no. 2 Bed Houses (3P): 13no. 3 Bed Houses (5P): 68no. 4 Bed Houses (7P): 22no.
Plot Ratio (Net Site Area)	0.36
Site Coverage (Net Site Area)	13.9%

Table 4: Key Site Statistics.

7.1 Proposed Residential Development

Amongst the 271no. dwellings proposed, there are a range of dwelling types, including apartments, duplexes and houses.

- The 103no. houses range in typology, comprising 2, 3 & 4 bed semi-detached and terraced houses of 2-3 storeys.
- The 162no. apartments are accommodated in 4no. apartment buildings of 1-5 storeys.
- The 6no. duplex units are arranged in a 3-storey terrace integrated with Apartment Block 1.

The following tables identify the range of housing and apartment type accommodation proposed within the scheme.

For clarity, duplex units are categorised as apartment types, per the Apartment Design Guidelines 2025 definition and assessment of unit size is shown in table 6 overleaf.

Table 5 below provides an assessment of the houses against the Quality Housing for Sustainable Communities (2007) guidelines.

Houses			
Unit Type	No. of Units	GFA (m ²) / Unit	Min. Size – Guidelines 2007
H2A – 2 Bedroom/4P	3	81.6	80
H2AM– 2 Bedroom/4P	3	81.6	80
H2AL– 2 Bedroom/4P	3	81.6	80
H2AR– 2 Bedroom/4P	3	81.6	80
H2B – 2 Bedroom/4P	1	84.9	80
H3A– 3 Bedroom/5P	8	92.0	92
H3AM– 3 Bedroom/5P	7	92.0	92
H3AL– 3 Bedroom/5P	3	92.2	92
H3AR– 3 Bedroom/5P	4	92.2	92
H3AL1– 3 Bedroom/5P	1	92.2	92
H3B– 3 Bedroom/5P	6	104.0	92
H3BM– 3 Bedroom/5P	4	104.0	92
H3BL– 3 Bedroom/5P	2	104.5	92
H3BR– 3 Bedroom/5P	3	104.5	92
H3BL1– 3 Bedroom/5P	1	104.5	92
H3C– 3 Bedroom/6P	3	139.0	110
H3CL– 3 Bedroom/6P	1	139.2	110
H3CR– 3 Bedroom/6P	1	139.2	110
H3DL– 3 Bedroom/5P	2	105.2	92
H3DR– 3 Bedroom/5P	2	105.2	92
H3E – 3 Bedroom/5P	7	94.6	92
H3EM– 3 Bedroom/5P	5	94.6	92
H3ER– 3 Bedroom/5P	3	95.0	92
H3EL– 3 Bedroom/5P	2	95.0	92
H3EL1– 3 Bedroom/5P	2	95.0	92
H3ER1– 3 Bedroom/5P	1	95.0	92
H4A – 4 Bedroom/7P	12	152.0	120
H4AL– 4 Bedroom/7P	4	155.6	120
H4AR– 4 Bedroom/7P	5	152.5	120
H4AL1– 4 Bedroom/7P	1	152.5	120
Total	103		

Table 5: Residential Development – Proposed Houses.

Apartments			
Unit Type	No. of Units	GFA (m ²) / Unit	Min. Size – Guidelines 2025
A1A1.1 / A1A2.1 / A1C1.1 – 1 bed	49	45 – 48	45
A2M2.1 / A2H1.1 / A2M1.1 / A2I3.1 / A2I1.1 – 2 bed (3P)	35	63.05 - 69.67	63
A2B1.1 / A2F1.1 / A2C1.1 / A2J1.1 / A2G1.1 – 2 bed (4P)	78	73.27 – 73.6	73
D3A 3 bed (5P) Duplex	6	90.8	90
Total	168		
Overall Total	271		

Table 6: Residential Development – Proposed Apartments / Duplex Units.

It can be seen from both Tables 5 and 6 above, that the houses and apartments / duplex units proposed either meet or, in many cases, exceed the minimum standards of the relevant Guidelines.

These details can also be found in the **Schedule of Accommodation and Housing Quality Assessment, together with the House Type drawings, prepared by O’Mahony Pike Architects** enclosed with this LRD application.

7.2 Residential Density

The proposed development seeks to provide 271no. units on a net site area of c. 3.6 Ha. Applying the methodology for the calculation of net density, as set out in the Compact Settlement Guidelines, results in a net density of c.76.2units per Ha. In terms of obtaining the net site, per the methodology of the Compact Settlement Guidelines the following areas have been excluded from the net area including: Regional attenuation area; Primary north-south link street; Primary east-west link street and Services connections & pump station.

Please refer to Architectural Design Statement submitted as part of this application, for further illustration and description of the proposed density to be achieved on site.

Overall, it is considered that the proposed density is consistent with the density policy of the Compact Settlement Guidelines, when reasoned consideration of the Core Strategy settlement hierarchy, the site accessibility and the local context and site characteristics are applied.

7.3 Landscape Proposals

We refer the Planning Authority to the **Landscape Masterplan prepared by Brady Shipman Martin Built Environment Consultants**, which provides a detailed overview of the proposed landscape integration, amenity open space and design within the application site. It demonstrates how the proposed housing, landscape design and spaces function to provide safe and convenient recreation for future residents.

The proposed scheme includes: hard and soft landscaping, boundary treatment and surface water drainage design, including:

Public open space, totalling c.4,519 sq m, in two identifiable areas labelled:

- POS1 (1,232 sq m) at the south eastern end of the application site
- POS2 (3,287 sq m) in the north western part of the site, incorporating an existing veteran Oak tree that is to be retained;

Communal open space, totalling c.1,154 sq m) in three identifiable areas labelled:

- COS1 (253 sq m)

- COS2 (723 sq m)
- COS3 (178 sq m);

7.4 Water Services

Confirmation of Feasibility (CoF) from Uisce Eireann, dated 18.02.2026 is enclosed with this LRD application. This CoF confirms that wastewater connection and water supply connections are feasible, subject to infrastructure updates. See **Appendix B** of the Engineering Planning Report.

A **Statement of Design Acceptance** from Uisce Eireann, dated 21/07/2026, accompanies this LRD Planning Application. See **Appendix E** of the Engineering Planning Report for this.

We refer the Planning Authority to the **Engineering Planning Report, prepared by AtkinsRéalis Consulting Engineers** for further detail on water supply and waste water drainage design.

7.4.1 Wastewater

We refer to the **Engineering Planning Report, prepared by AtkinsRéalis Consulting Engineers** for further detail.

The proposed foul pumping station, twin rising mains, and vehicular, pedestrian and cycle access onto Old Connaught Avenue is in accordance with the Old Connaught Local Area Plan 2025.

The design of the proposed foul pumping station and rising mains for the Old Connaught Local Area Plan lands is being prepared by AtkinsRealis Consulting Engineers in close consultation with Uisce Eireann and Dun Laoghaire Rathdown County Council and forms part of the enabling infrastructure to support both this and future LRD planning applications.

Our client has proposed directional drilling under the M11, in order to connect the new pumping station and associated twin rising mains to the existing public foul network c.125m east of the M11.

We note that the Consent Area drawing that accompanied the requested letter of consent pertained to both the permanent rising mains under the M11 and a potential interim rising mains within the bridge deck of Old Connaught Avenue, which is a confirmed TII structure. This potential interim rising mains was investigated and was considered not to be feasible and/or the optimum solution. This potential route has thus not been included in this instant planning application, and it has been confirmed through contact with TII that the M11 corridor at this location is in the ownership of DLRCC. It has therefore been concluded that only a letter of consent from DLRCC is required for the purpose of making this planning application, as stated in the Application Form and as attached with this application.

A letter of consent has been obtained from DLRCC dated 28/07/2026, as other lands that are not within our clients ownership are located lands owned by the Local Authority.

7.4.2 Surface Water Drainage

The storm water system will be in accordance with “The Regional Code of Practice for Drainage Works”.

The foul and storm sewer networks, see **Stormwater Impact Assessment Report prepared by Atkins**. No foul effluent will discharge to the storm water system and vice versa.

The SuDS strategy adopted for this development provides a comprehensive approach to the management of storm water on the site. SuDS measures proposed, within the curtilage of dwellings, include the following: -

- Swales
- Permeable Paving
- Extensive Green Roofs

- Filter Drains
- Vortex Flow Control Devices

7.4.3 Site Specific Flood Risk Assessment

We refer Planning Authority to the Flood Risk Assessment Stage 1 and 2 carried out in accordance with the Flood Risk Management Guidelines, prepared by AtkinsRéalis Consulting Engineers. This report concludes that: -

*“The majority of the site is located within **Flood Zone C**, with only limited encroachment of Flood Zones A and B into peripheral areas of the development lands.*

Application of the Sequential Approach has informed the site layout and all residential dwellings, apartment buildings and other highly vulnerable development have been located within Flood Zone C. Limited infrastructure elements including sections of road and buried utilities occur within Flood Zones A and B; however, these elements will not impede flood flows or increase flood risk elsewhere.

The development incorporates surface water management measures, exceedance flow routing, climate change allowances and finish floor levels outside the extents of flood zones. The proposed development can therefore be developed safely without giving rise to unacceptable flood risk to people, property or the surrounding environment.

The Stage 2 Initial Flood Risk Assessment has demonstrated that the proposed development is compatible with the identified flood risk constraints and that vulnerable development has been directed towards Flood Zone C in accordance with the Planning System and Flood Risk Management Guidelines. No further flood risk assessment is considered necessary to support this planning application.”

7.5 Transportation

We refer Planning Authority to the **Traffic and Transport Assessment**, prepared by AtkinsRéalis Consulting Engineers, which addresses proposed road infrastructure, traffic generation, pedestrian and cyclist linkages and safety, public transport availability and capacity.

7.5.1 Access

The proposed development will be served by new vehicular and active travel access, extending from Old Connaught Avenue along the proposed primary North-South link street and into the ‘Central Character Area Lands – East’, in accordance with the LAP.

All residential development on the ‘Central Character Area Lands – East’ that are within the Applicant’s ownership can be accessed off this route. This minimises the number of crossing points over the potential future Luas line.

This access route will also facilitate development in the Council owned land located immediately to the north of Old Connaught Avenue.

We refer the Planning Authority to the roads drawings **100126446-ATK-XX-00-DR-CE-900101**, prepared by AtkinsRéalis Consulting Engineers .

7.5.2 Car Parking

There is a total of 289no. car parking spaces proposed including: A total of 289no. car parking spaces comprising

- 241no. surface spaces (inclusive of 11no. visitor spaces, 2no. ESB spaces, 2no. Go-Car (shared) spaces, and 9no. disabled spaces)

- 48no. undercroft spaces (inclusive of 2no. disabled spaces)
- 20% of residential car parking spaces equipped with Electric Vehicle charging points

EV charging is provided for 58no. of the on-street car parking spaces, with future EV charging provision enabled by ducting for the remaining on-street car parking spaces. 20% of all residential and visitor car parking spaces are equipped with an EV Charging Point. All in-curtilage parking provision has been designed to allow for EV charging.

9no. accessible car parking spaces are provided across the proposed scheme.

Please refer to the **Car Parking Plan drawing and Schedule of Accommodation, prepared by O'Mahony Pike Architects.**

7.5.3 Bicycle Parking

A total of 435no. bicycle parking spaces are proposed on site with: 48no. dedicated bike spaces are provided for houses; 303no. dedicated bike spaces are provided for apartments and duplexes.

An additional 12 motor bicycle parking are also provided for throughout the site.

Many of the houses have access to the rear gardens either from the footpath or laneway system (rather than through the house) as such only 48no dedicated bike spaces are needed in-curtilage for the houses.

Bicycle parking has been carefully considered to ensure safe use and ease of maintenance. Each bicycle parking location has been selected with passive surveillance in mind, at visible locations to maximize overlooking.

We refer to the **Schedule of Accommodation for the breakdown and Architectural drawings, prepared by O'Mahony Pike Architects.**

7.6 Public Lighting & Site Services

We refer the Planning Authority to **Outdoor Public lighting and public lighting layout drawings prepared by Sabre Electrical Services Ltd** enclosed with this LRD Application.

The public lighting proposals have been designed with due regard to public safety and the creation of welcoming streets and spaces.

The public lighting layout has been co-ordinated with the landscaping scheme designed by Brady Shipman Martin Built Environment Consultants and consideration has been given to ensure the proposed street lighting does not impact wildlife with efforts to avoid light spill.

7.7 Childcare/Community Facility

Section 2.4 of the Childcare Facilities: Guidelines for Planning Authorities (2001) set out general standards for the land use planning issues related to childcare provision in Ireland.

In relation to 'New Communities / Larger New Housing Developments', it is noted that *"planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments."*

The Guidelines outline that childcare facility provision should be made on the basis of 20no. childcare spaces for every 75no. dwellings permitted in a scheme.

Regard should also be had to Section 4.7 of the Apartment Guidelines which states: -

One bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.

The proposed development comprises 271no. dwellings, including:

- 49no. 1-bed apartments,
- 113no. 2-bed apartments,
- 6no. 3-bed duplexes,
- 13no. 2-bed houses,
- 68no. 3-bed houses, and
- 22no. 4-bed houses.

The proposed development will create a theoretical demand for c. 43no. childcare spaces based on the omission of all 1 bedroom units and 50% of 2 bedroom apartments and houses.

1no. childcare facility at ground floor level of apartment block 3 (c. 574 sq. m) with an estimated capacity of c. 90 childcare spaces is proposed for this development. This significantly exceeds the likely theoretical demand arising for the proposed residential scheme.

We refer to the **Architectural Design Statement, prepared by O'Mahony Pike Architects and creche drawing (ground floor of Block C) 24004-OMP-B3-ZZ-DR-A-1000.**

7.8 Part V

The LRD application is accompanied by a Part V Proposal, prepared by Stephen Little & Associates on behalf of the Applicant, together with a Part V Proposal Report dated June 2026, prepared by O'Mahony Pike Architects.

The applicant is proposing 55no. Part V units, per the recommendation of the LRD Opinion. This is made up of:

- 45no. apartments in Block 3 (11no. 1-bed and 34no. 2-bed)
- 6no. duplex (3-beds)
- 4no. 2-bed houses

7.9 Archaeology

We refer the Planning Authority to the **Archaeological and Architectural Assessment**, prepared by Irish Archaeological Consultancy Ltd., which provides a more detailed discussion regarding this aspect of the project. This report concludes that: -

"There are no recorded monuments located within the proposed development area. The closest comprise a medieval church and graveyard (DU026-066002-1), located c. 185m to the southwest. There are no protected structures or buildings listed in the NIAH within the proposed development area. The closest protected structure consists of a walled garden at Festina Lente (originally associated with Old Connaught House), which is located c. 10m to the west (RPS No. 1876; NIAH No. 60260075).

A review of the Excavations Bulletin (1970–2026) has revealed that one previous investigation has been carried out within the eastern portion of the proposed development area, comprising a geophysical survey in 2008, followed by test trenching in 2010 (Nicholls 2008, Licence No. 08R0308; Bayley 2010, Licence No. 10E0345). A burnt spread measuring 11m x 11m was recorded within the proposed development area, which may represent a possible fulacht fia. No further finds or features of archaeological significance were uncovered.

Analysis of cartographic sources has revealed that the proposed development area was situated within the demesne landscape associated with Old Connaught House, which itself is located c. 365m northwest of the proposed development site (NIAH, 60260073. RPS, 1875). The house was constructed at the end of the 18th century and the demesne and walled gardens established at this time. After 1871 the landscape was extended further, but more recent developments have impacted on the original landscape, including the construction of the N11. Much of the greenspace has reverted to agricultural use.

A review of the aerial photographic coverage shows that the landscape containing the proposed development has remained relatively unchanged since 1995. Google Earth coverage, dating to

June 2018, shows a potential circular enclosure (as a crop mark) located to the immediate west of the proposed development area. The mark is not definitive and would require further investigation in order to confirm an archaeological origin.

A field inspection has been carried out as part of this assessment and this confirmed the results of the baseline analysis. No previously unrecorded archaeological sites, or architectural structures, were noted within the proposed development area. No indication of archaeological remains were noted at the site of the potential enclosure.”

7.10 Daylight/Sunlight

We refer the Planning Authority to the enclosed **Sunlight and Daylight Assessment**, prepared by Model Works which considered the daylight / sunlight standards achieved for all apartments and duplexes as well as private, public and communal open space. The Report finds: -

“The proposed development is predominantly a low-rise scheme located on a green field site in a semi-rural setting. The results of the analysis for the provision of daylight to the rooms are very positive. The scheme has an overall compliance rate of 99% of the rooms meeting the BRE Guide when assessed with trees, and 99.8% when trees are excluded. The scheme also achieves a high level of compliance for sunlight provision with 88% of the units meeting the BRE Criteria, and 73% achieving a Medium or High level of sunlight exposure.

Included in the development is c. 5900m² of amenity space, three communal open spaces (COS), two public open spaces (POS), and a creche play area. All individual spaces meet the BRE Guide for sunlight provision, and combined, 95% of their area meet the threshold of 2 hours of sunlight on 21st March.

The majority of buildings in the scheme rise to just 2-3 storeys and four apartment blocks ranging in height from 3 to 5 storeys. This modest massing, together with the generous separation distances to existing buildings, ensures that the effect on the receiving environment is very limited. Only one existing dwelling required consideration in the assessment, and it was predicted to experience no more than a negligible impact.

The BRE Guide and BS EN 17037:2018 are expressly advisory documents intended to inform professional judgement rather than impose rigid compliance thresholds. These standards explicitly recognise that numerical targets must be interpreted flexibly, and acknowledge that minor deviations affecting a limited number of rooms do not undermine the acceptability of a development.”

7.11 Sustainability & Energy Statement

An **Energy & Sustainability Statement**, prepared by Delap & Waller is enclosed with this planning application. This analysis determined that *“all buildings within the proposed development will achieve compliance with TGD Part L (2022) and consequently the Old Connaught Local Area Plan 2025 policies. Compliance has been demonstrated through DEAP calculations.”*

7.12 Taking in Charge

We refer the Planning Authority to Dwg. No. **24004-OMP-00-SP-DR-A-1500**, prepared by **O’Mahony Pike Architects** which identifies the areas of the proposed development to be taken in charge by DLRCC.

7.13 Construction & Environmental Management Plan

We refer the Planning Authority to the enclosed **Construction & Environmental Management Plan (CEMP)**, prepared by **AWN Consulting** with inputs from Brady Shipman Martin Built Environment

Consultants (Ecological Consultant). The CEMP sets out typical arrangements and measures which may be undertaken during the construction phase of the project in order to mitigate and minimise disruption / disturbance to the area around the site. The CEMP should be treated as a live document and the final CEMP will be communicated to all relevant personnel on site should the scheme be permitted.

7.14 Waste Management

We refer the Planning Authority to the **Resource and Waste Management Plan, prepared by AWN Consulting**, and provides information necessary to ensure that the management of construction waste at the site is undertaken in accordance with the current legal and industry standards.

We refer the Planning Authority to the **Operational Waste Management Plan, prepared by AWN Consulting**, and provides information necessary to ensure that the management of operational waste at the site is undertaken in accordance with the current legal and industry standards.

8 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

The proposed development has full regard to the policies, objectives and standards set out in the following national and regional planning strategies and guidelines: -

- National Planning Framework - Project Ireland 2040 First Revision 2025
- Delivering Homes, Building Communities 2025-2030
- Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly 2019 – 2031.
- Climate Action Plan 2025
- National Biodiversity Action Plan 2023-2030 (4th Edition)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)
- Quality Housing for Sustainable Communities (2007) guidelines.
- National Sustainable Mobility Policy.
- The Planning System and Flood Risk Management (2009).
- Design Manual for Urban Roads and Streets (2019).
- Childcare Facilities, Guidelines for Planning Authorities (2001).

We refer the Planning Authority to **Appendix A of this report for the Statement of Consistency** which sets out responses to the document listed above.

9 STATUTORY PLANNING CONTEXT

9.1 Dún Laoghaire-Rathdown County Development Plan 2022 – 2028

The Dun Laoghaire-Rathdown County Development Plan 2022 – 2028 (the Development Plan) came into effect on 21 April 2022 and is the statutory land-use plan governing the subject lands at this time.

Variation No.1 to the CDP was made at a special council meeting on April 21st 2026. The CDP was subject to proposed material alterations to Proposed Variation No.1 of the CDP 2022-2028. The CE's report was circulated to Elected Members for their consideration on Thursday 23rd July 2026 and it is expected Proposed Material Alterations to Proposed Variation No.1 will take place at a council meeting later this year.

The below outlines the Objectives of the Development Plan, as varied, of particular relevance to the assessment of the proposed development. Each objective is quoted in *italics* and the *Applicant's Response* provided to each, in turn.

9.1.1 Planning for Growth, Core Strategy & Settlement Strategy

Objective CS2

It is a Policy Objective to support the delivery of the Core Strategy in accordance with the Core Strategy Map illustrated in Figure 2.9 and the Core Strategy Table detailed at Table 2.11

Variation No. 1 as proposed amends the quantum of zoned land and residential yield in Old Connaught, from 50.13 ha and 2,005no. units previously, to 58.30 ha and 3,162 - 3,690no. units potential residential yield.

Location	Hectares	Potential Residential Yield	Serviced or Serviceable
Sites under Construction ¹	53.62	3,540	Serviced
Sites with an extant planning permission not commenced ²	87.58	8,788	Serviced
Sites with no planning permission ³	275.41 272.71	21,810– 22,338 15,197	Serviced and Serviceable
Infill/Windfall	122.20 119.50	10,276 9,559	Serviced and Serviceable
Ballyogan & Environs	44.18	2,562	Serviced and Serviceable
Woodbrook- Shanganagh	48.67 9.95	2,354 857	Serviced
Kiltiernan- Glenamuck	43.42	1,617	Serviced
Old Connaught	58.30	3,162 - 3,690	Serviced and Serviceable
Rathmichael	83.00	3,100	Serviceable

Figure 5A: Extract from Table 2.9A of the DLRCC Development Capacity Audit- CE Report

Table 2.9: DLR Residential Development Capacity Audit – Aggregate Data (Accurate as of Q4 2019)

Location	Hectares	Potential Residential Yield	Zoning Tier
Infill/Windfall – Sites under Construction	35.63	1,837 ⁵	Tier 1
Infill/Windfall – Sites with an extant planning permission not commenced	63.1	1,299	Tier 1
Infill/Windfall – Sites with no planning permission	67.13	1,436	Tier 1 and Tier 2
Infill/Windfall - Total	165.86	4,571	Tier 1 and Tier 2
Ballyogan & Environs	71.8	4,147	Tier 1 and Tier 2
Woodbrook-Shanganagh	29.53	1,998	Tier 1 and Tier 2
Kiltiernan-Glenamuck	59.34	2,015	Tier 1 and Tier 2
Old Connaught	50.13	2,005	Tier 2
Rathmichael	83.05	2,431	Tier 2
Cherrywood	93.55	5,596 - 8,186	Tier 1 and Tier 2
Total	553.28	22,763 - 25,353	
Less Actual and Estimated Completions Q1 2020 to Q1 2022		1,877	
Adjusted Total		20,886 – 23,476	

Figure 5B: Extract of table 2.9 from DLRCC CDP**Applicant's Response**

The proposal includes the development of 271no. residential units, which represents approximately 8.6% of total Zoned Residential Capacity for Old Connaught, as outlined in the above extract from Tables (figures 5A and 5B) of the Development Plan and proposed recommendation variation.

The proposed development supports the appropriate growth of Dún Laoghaire-Rathdown County by ensuring that development takes place on residentially zoned land within Old Connaught, which is a planned 'New Residential Community' with capacity to absorb the housing allocated by the Core Strategy. We further note, page 35 of the CE's report on Proposed Material Alterations to Proposed Variation No.1 (23.07.26) confirms to accept this proposed material alteration.

The proposed development will be within walking distance of the Planned Green Line Extension to Bray Fassaroe, with a future Luas stop planned within the vicinity of Old Connaught Avenue. It is currently served by BusConnects routes, as previously identified in this report. It is therefore representative of sustainable, compact development at an accessible location.

The proposed development is consistent with the Core Strategy Settlement Hierarchy, A1 new residential land use zoning and housing allocation of the Development Plan, as varied, and with the provisions of the Old Connaught LAP for these lands.

9.1.2 Land Use Zoning

Under the Development Plan, the application site is zoned 'A1' for new residential communities, the objective of which is states as: -

“To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans or approved Framework Plans”

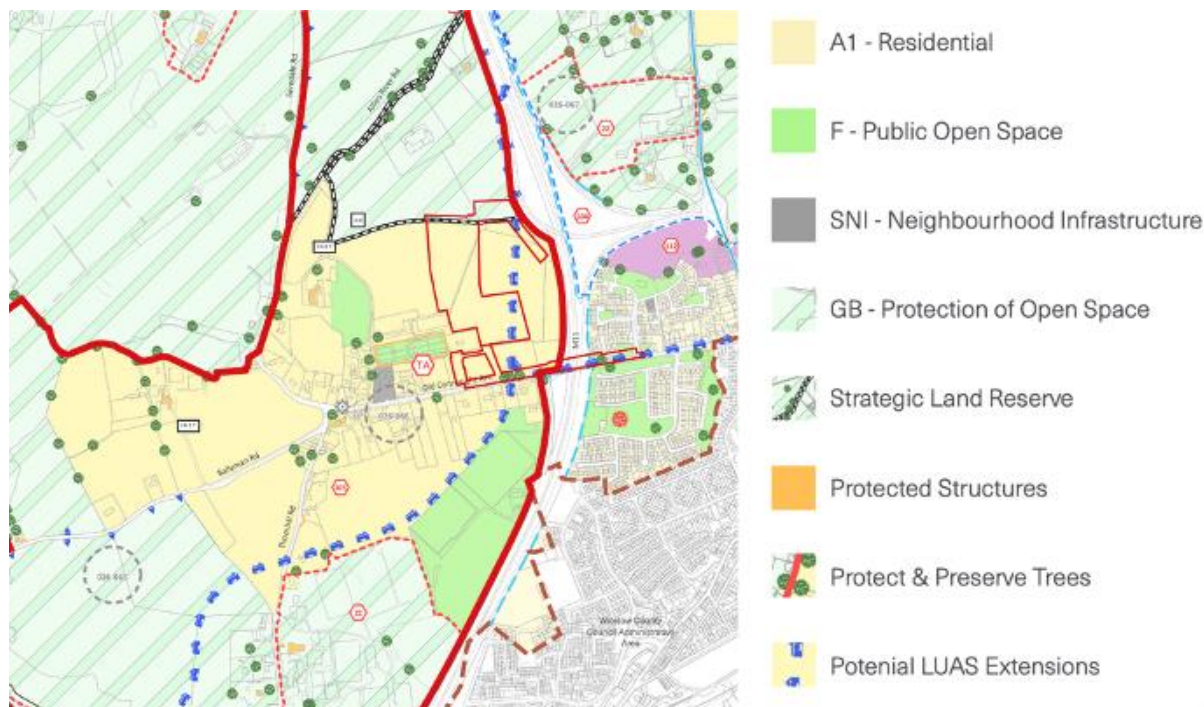


Figure 6: Extract from DLRC County Development Plan 2022-2028 Map 14, with application site outlined indicatively in red (SLA overlay). Refer to Site Location Plan submitted with the application for definitive red line.

Below are the 'Permissible Uses' and uses that are 'Open to Consideration' under the **Objective A1** land use Zoning:

A1-Permissible Uses
Assisted Living Accommodation, Carpark, Caravan Park-Residential, Community Facility, Craft Centre/ Craft Shop, Childcare Service , Cultural Use, Doctor/ Dentist etc., Education, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Health Centre / Healthcare Facility, Industry-Light, Off-License, Offices less than 600sq.m, Open Space, Service Station, Place of Public Worship, Public House, Public Services, Residential , Residential Institution, Restaurant, Service Garage, Shop-Specialist, Shop Neighbourhood, Shop District, Sports Facility, Tea Room/Café, Travellers Accommodation, Veterinary Surgery
A1- Open to Consideration Uses
Allotments, Advertisement and Advertising Structures, Agricultural Buildings, Aparthotel, Betting Office, Caravan/Camping Park-Holiday, Cash and Carry/Wholesale Outlet, Cemetery, Heavy Vehicle Park, Home Based Economic Activities, Hospital, Hotel/ Motel, Household Fuel Depot, Industry-General, Motor Sales Outlet, Nightclub, Office Based Industry, Offices, Refuse Transfer Station, Residential – Build to Rent, Rural Industry Cottage, Rural Industry-Food, Science and Technology Based Industry, Shop-Major Convenience, Student Accommodation.

Applicant's Response

The proposed residential and creche development, and associated site works, at the application site is consistent with the A1 zoning objective, and may be considered permissible in principle.

The proposed residential development does not encroach the GB Greenbelt zoning north of the application site. It is noted that Residential use is open for consideration under the GB zoning objective and thus that any ancillary residential works may also be considered at these lands.

The proposal has been devised having regard to the provisions of the Development Plan and Old Connaught LAP, and is therefore consistent with the land use zoning objectives that apply to the application site.

PROPOSED SITE LAYOUT



Figure 7: Extract from Proposed Site Layout Plan prepared by O'Mahony Pike Architects.

9.1.3 Proposed Variation No.1 – Residential Mix

Proposed Variation No.1 to the Dún Laoghaire-Rathdown County Development Plan 2022-2028 seeks to introduce changes to align the Local Area Plan boundaries, including the adopted Old Connaught LAP, proposed rezonings and new specific local objectives.

Proposed Variation No.1 also seeks to align the Development Plan standards with the ‘Planning Design Standards for Apartment, Guidelines for Planning Authorities (2025)’.

Proposed Variation No.1 (alteration no. 17) deletes Table 12.1 of the Development Plan entirely, which includes a need for a minimum 40% 3+ bedroom units. It goes onto state that:

*“In accordance with Specific Planning Policy Requirement 1 (a) and (b) of the Design Standards for Apartments Guidelines, **statutory plans shall not impose restrictions on the mix of unit sizes or types within apartment developments, nor set minimum or maximum bedroom requirements**—except in the case of social housing developments, social/affordable housing under Part V or schemes for older persons informed by a Housing Need and Demand Assessment (HNDA). The HNDA prepared as part of the review of the County Development Plan will examine housing mix provision for social housing schemes, Part V and older persons housing.”*

Furthermore, at the time of lodgement of this application, the public consultation period for the Proposed Material Alterations to Proposed Variation No.1 has just closed (26 June 2026). Proposed Material Alteration No. 8 of Variation No.1 seeks to remove the following wording:

‘the majority of apartments in any proposed scheme of 10 or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed, by a minimum of 10%’

Applicant’s Response

Proposed Variation No.1 with Material Alteration No.8 is not expected to be adopted before September 2026 at the earliest. However, this Planning Report and Statement of Consistency is prepared on the assumption that the Variation with Material Alteration will be adopted by the Council.

While the proposed apartment mix does not comply with the current County Development Plan requirement for a 40% three-bed dwelling provision, the mix is informed by the Apartment Design Guidelines 2025 and the draft Variation No.1 which seeks to remove this 3-bed threshold.

At least 25% of the proposed apartments shall exceed the minimum floor area standard for any combination of 1, 2 or 3-bed units, in accordance with SPPR2 of the Apartment Guidelines.

The proposed scheme has been developed on the basis of our expectation that Variation no.1 with Material Alteration No.8 will be adopted by the Council.

9.1.4 Specific Local Objective

Specific Local Objective (SLO) 105 applies to the application site and the immediate vicinity.

SLO 105 (as amended in proposed Variation No. 1 of the Development Plan) requires that: -

“Development shall take place in accordance with the adopted Old Connaught Local Area Plan 2025.”

Applicant’s Response

The proposed development is consistent with the policies and design objectives of the Old Connaught LAP.

We refer to Section 9.2 of this Report which demonstrates this further.

We also refer the Planning Authority to the Design Statement, prepared by O’Mahony Pike Architects which also details compliance with the LAP.

9.1.5 Map Based Objectives

9.1.5.1 Local Area Plan

Map Sheet 14 of the Development Plan shows that the subject lands are subject to an LAP. (Note: Thicker red line on Figure 6 above). The Old Connaught LAP 2025 came into force in December 2025.

Applicant's Response

The Old Connaught Local Area Plan 2025 came into effect on 9 December 2025.

The proposed development is consistent with the policies of the LAP. We refer the Planning Authority further to Section 9.2 of this Report which outlines how the proposed development is in compliance with the LAP.

We also refer the Planning Authority to the Architectural Design Statement, prepared by O'Mahony Pike Architects which also details compliance with the LAP.

9.1.5.2 Proposed Luas Extension

Map Sheet 14 of the Development Plan shows that the proposed Luas Line Extension (Note: Blue tram icon on Figure 4 above) runs through subject lands.

Applicant's Response

The proposed development includes a 7m wide corridor, on the eastern side of the proposed North-South link road, for the potential future Luas extension to Fassaroe, as required under the Old Connaught LAP.

We refer the Planning Authority to Drawing No. 24004-OMP-00-SP-DR-A-1000 entitled **Proposed Site Layout Plan**, prepared by O'Mahony Pike for confirmation the 7m wide Luas reserve is in place.

9.1.5.3 Tress and Woodland Preservation

Map Sheet 14 of the Development Plan shows trees and woodlands to be protected and preserved.

Applicant's Response

Existing trees along the southern boundary of the proposed development will be retained within the public open space, save for those within the proposed North-South link road and associated active travel infrastructure.

Additionally, per the recommendations of the LRD Opinion, the existing veteran Oak located in the north western of the site will be retained, within a suitable buffer of open space to avoid encroaching the tree's root protection area.

We refer to the **Arboricultural Report** and associated drawings, prepared by The Tree File Ltd.

9.1.6 Residential Density

Objective PHP18 – Residential Density

Ensure that proposed residential development contributes to the creation of sustainable communities and accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 (and any superseding document) and companion Urban Design Manual – A Best Practice Guide, DEHLG 2009 and the Design Manual for Urban Roads and Streets (DMURS) (as revised).

Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.

Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”

The overall density is 76.2 dwellings per hectare.

We note the text for **Policy Objective PHP18: Residential Density** is proposed to be amended as part of the recommendations in the Chief Executive Report in respect of the proposed Variation No. 1 of the Current Development Plan to make reference to the Compact Settlement Guidelines:

“The Sustainable and Compact Settlement Guidelines, 2024 include recommendations regarding appropriate densities for various types of locations. Having regard to the parameters set out in the Guidelines, in particular Section 3 Settlement, Place and Density, the density ranges take into account the following:

- *The amended CSO settlement boundaries for the Dublin City and Suburbs and Bray.*
- ~~*Car parking zones as set out in the County Development Plan 2022-2028.*~~
- *Walking distances from high frequency public transport stops / stations including DART/Luas and Core Bus Corridor Routes.*
- *Walking distances from high frequency BusConnects routes (10-min peak hour service).*
- *Walking distances from reasonable frequency BusConnects routes (15-min peak hour service).”*

While it is noted that Tables 3.1 (**Dublin City & Suburbs**) and 3.3 (**Metropolitan Towns**) of the Sustainable and Compact Settlement Guidelines only refer to **high frequency** and **accessible** public transport in relation to density range, it is considered appropriate to also include ‘**intermediate locations**’ (i.e. 1km walking distance from high frequency bus and 500m walking distance from reasonably frequent bus) as being ‘accessible’ and allowing for higher densities within the suburban / urban extension locations.

Settlement Types in Dun Laoghaire Rathdown County:

New boundaries, called Built Up Areas (BUA), were introduced for the Census 2022. Having regard to the amended CSO boundaries, the majority of the built-up area of the County is located within the **Dublin City & Suburbs** (DCS) area.

The County also includes part of the **Metropolitan town of Bray** in the Southeast area of the County. For the purposes of the RSES, the Metropolitan town of Bray (MTB) includes the Old Connaught area.

Density ranges are plan-led within the OCLAP boundary. Density ranges for lands within the Dublin City or Suburbs (DCS) or ‘**DLR Urban Areas**’ and MTB or ‘**DLR Metropolitan Town**’ will be promoted as follows:

dlr Urban Areas:

Settlement Type	Public Transport Proximity /parking-zone	Density Range (dph)
Urban Neighbourhood	1km walk to DART/Luas & or 500m Core Bus Corridor combined with park zones 1 and 2	50-250
Suburban Accessible	500m walk to high frequency bus combined with park zone 2	40-150
Suburban Intermediate	1km walk high frequency bus & 500m walk to reasonably frequent bus combined with park zone 2	40-150
Suburban / Urban Extension	Remaining areas within the Dublin City and Suburbs within park zone 3	40-80

Figure 8: Recommended Density Ranges as per CE Report in respect to DLRC Variation No.1

Applicant's Response

The proposed development has regard to Sustainable Residential Development and Compact Settlement Guidelines 2024 (refer to Appendix A for further detail).

The Guidelines set out the methodology for the determination of appropriate densities having regard to the settlement hierarchies. See Figure 3.3 of the Guidelines for establishing, optimising and refining appropriate density.

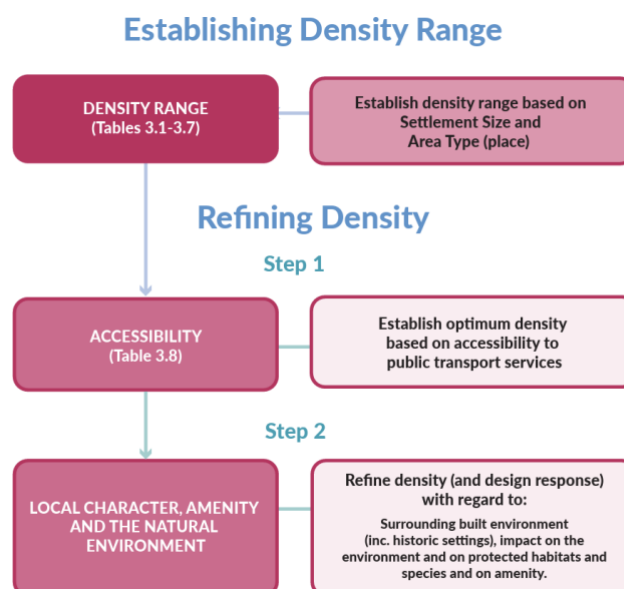


Figure 9: Extract from the Compact Settlement Guidelines.

Table 3.1 of the Compact Settlements Guidelines sets out the density ranges for **Key Towns**, which includes Bray, as the application site sits outside the current Dublin City and Suburbs designation per CSO maps.

The RSES and CDP allows for provision of the key town of Bray in a targeted location outside the town up to a maximum of 30%. The location of the Old Connaught lands can be considered '**Key Town – Centre and Urban Neighbourhoods**', defined as: -

"The centre and urban neighbourhoods category includes: (i) the town centre and immediately surrounding neighbourhoods, (ii) strategic and sustainable development locations, and (iii) lands around existing or planned high capacity public transport nodes or interchanges (defined in Table 3.8). It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns."

In relation to accessibility, table 3.8 of the Compact Settlement Guidelines defines lands around existing or planned high Capacity public nodes or interchanges as:

- **High Capacity Public Transport Node or Interchange Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' stop.**
- *Highest densities should be applied at the node or interchange and decrease with distance.*
- *'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport*

[Emphasis added by SLA]

In our considered opinion, the proposed development is located within lands around a planned high capacity public transport Node, in this case within 1km of the **proposed Old Connaught Luas extension**, expanding the Green Luas line into County Wicklow. The indicative route alignment features stops at: Stonebridge Road; Crinken Kane; **Old Connaught Avenue**; Dublin Road and Bray Dart Station.

Residential densities in the **range 50 dph to 150 dph (net) shall generally apply**, therefore the proposed net density of **76.2dph** accords with these guidelines. The proposed net density 76.2 dph sits comfortably within the median of the 50 to 150dph residential density range.

As noted previously under section 7.2 of this report this scheme applies the methodology for the calculation of net density, as set out in the Compact Settlement Guidelines appendix. The following areas have been excluded from the net area (as allowable per Table 1 of Appendix A of the compact settlement guidelines): Regional attenuation area; Primary north-south link street; Primary east-west link street and Services connections & pump station.

Whilst no emerging route has been identified and the LUAS is not a committed project at this time, the NTA has confirmed that the area including the main north-south link road will be served by a bus route. In the meantime, existing bus routes service the immediate area along the Dublin Road to the east.

The proposed development ensures that Old Connaught Phase 1 represents the proper and sustainable development of the Old Connaught LAP lands, by achieving sustainable higher residential density that supports investment in sustainable transport, while still allowing the built environment to deliver residential amenity and successful integration with the natural amenity and landscape of the surrounding area.

We refer the Planning Authority to the enclosed **Architectural Design Statement**, prepared by O'Mahony Pike Architects and the Landscape plans and particulars prepared by Brdy Shipmann Martin for further details.

Objective PHP42 – Building Design and Height

Encourage high quality design of all new development. Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 22 of the NPF).

Appendix 5 of the Development Plan outlines the building height strategy for the County. This refers to the heights outlined in the Old Connaught Local Area Plan (2 – 4 storeys) and states that: -

There may be instances, where an argument can be made for increased height within the plan area. In those instances, any such proposals would have to be assessed in accordance with any new performance criteria as set out in section 5 of this Building Heights Strategy as per SPPR 3.

Applicant's Response

We refer to the enclosed Elevations, prepared by O'Mahony Pike Architects for details. The Applicant has had due regard to the indicative heights within the LAP as set out in table 4.3 of the Old Connaught LAP. The building heights generally accord with the building heights between 2/3 stories to 4 stories. The only deviation is a 5 storey apartment to the north which was welcomed by the planning authority at a prominent corner location. Full regard has been had to the DLR Height Strategy for the County as well as a detailed response to Appendix 5 within the Opinion Response on this item

We also refer to the Statement of Consistency within Appendix A of this report, as they pertain to the Building Heights guidelines.

Objective PHP6 – Childcare Facilities

Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.

Applicant's Response

The proposed development includes a childcare facility at ground floor level of apartment block 3 (c.574 sq. m). It has an estimated capacity of c. 90 childcare places.

As noted above, the capacity of the proposed exceeds the likely generated demand for the proposed dwellings in this first phase of development and will absorb also the demands of later phases.

We would respectfully request that the delivery of the proposed creche can be phased in, by way of planning condition, once phase 1 of the scheme has been constructed and occupied to support the viable operation of the creche.

9.1.7 Climate Action**Policy CA5 – Energy Performance in Buildings**

It is a Policy Objective to support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing and new buildings, including retro fitting of energy efficiency measures in the existing building stock.

Applicant's Response

We refer the Planning Authority to the Energy and Sustainability Report, prepared by Delap and Waller which describes the climate change adaptation measures proposed as part of the scheme. This report confirms:

“The proposed development will be designed and constructed to meet Approved Document Part L 2022 Conservation of Fuel and Energy – Dwellings. This standard is also referred to as Nearly Zero Energy Building Standard (NZEB), which has become the regulatory standard since October 2022. The Part L regulation requires an overall improved energy performance for the fabric, services, lighting and renewable specification. For the residential dwellings, the standard requires an overall improved energy performance for the fabric, services and lighting specification. The standard requires a Carbon Performance Coefficient level of <0.35 and an Energy Performance Coefficient level of <0.30. The NZEB standard also introduces a mandatory requirement for renewable energy sources, to provide a minimum of 20% of the primary energy use from renewable energy.”

Policy CA17 – Electric Vehicles

“It is a Policy Objective to support, the Government's Electric Transport Programme by progressively electrifying our mobility systems by facilitating the rollout of Electric Powered Vehicle Recharging Parking Bays across the County and on public roads and other suitable location. The provision of e-bike chargers will be supported subject to the availability of Funding. (Consistent with NSO 4 of the NPF and RPO 7.42 of RSES)’

Applicant's Response

We refer the Planning Authority to the enclosed Schedule of Accommodation and Drawing No. 24004-OMP-00-SP-DR-A-1200, prepared by O'Mahony Pike Architects.

As described previously in Section 7.5 above, 58no. Electric Vehicle parking spaces are proposed which equates to 20% of the total car parking provision.

Policy CA18 – Urban Greening

“It is a Policy Objective to retain and promote urban greening – as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high-quality biodiverse landscaping (including tree

planting), nature-based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES)."

Applicant's Response

The proposed scheme integrates landscape features and amenity open space.

Public open space, totalling **c.4,519 sq m** is provided in two identifiable areas, one to the south eastern side and one to the north western side, as described below.

The south eastern public open space (POS1, c.1,232 sq m) retains significant existing trees and hedgerow features along the southern boundary.

The north western space (POS2, c.3,287 sq m), incorporates an existing veteran Oak and facilitates the proposed active travel route. It establishes visual connectivity between the housing scheme and the future Luas corridor, promoting use of active travel opportunities and public transport within a green environment.

We refer to the **Landscape Masterplan**, prepared by Brady Shipman Martin Built Environment Consultants and Architectural Design Statement, prepared by O'Mahony Pike Architects.

We refer the Planning Authority also to the **Engineering Planning Report** and section 3.1.8 of the **Flood Risk Assessment** Stage 1 and 2, prepared by AtkinsRéalis Consulting Engineers. These documents identify that the majority of the application site is in Flood Category C. They also provide details on the SUDS mitigation measures that address potential for flood risk.

9.1.8 Apartment Design Standards

9.1.8.1 Internal & External Storage

Section 12.3.5.3 Internal Storage and External Storage of the Development Plan states that internal storage standards for apartments shall accord with, or exceed the levels outlined in Table 12.3 below: -

Table 12.3: Minimum Storage Space Requirements

Minimum Requirements
One Bedroom 3 sq.m.
Two Bedroom (3 person) 5 sq. m.
Two Bedroom (4 person) 6 sq. m.
Three Bedroom 9 sq.m.

Figure 10: Extract of Table 12.3 Minimum Storage Space Requirements from Dún Laoghaire-Rathdown County Development Plan 2022-2028.

- *"Storage should be additional to kitchen presses and bedroom furniture.*
- *Hot press/boiler space will not count as general storage.*
- *No individual storage room should exceed 3.5sq.m. and shall be provided within the apartment unit.*

Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit."

The Development Plan standards are consistent with the 2025 Design Standards for Apartments.

Applicant's Response

We refer to apartment unit types A1B1, A2B1, A2C1.1, A2I1.1, A2B1.1 and D3A and to the enclosed **Architectural Design Statement**, **Housing Quality Assessment** and **apartment floor plans**, prepared by O'Mahony Pike Architects, for confirmation that the proposed apartments meet the relevant Internal Storage quantum requirement.

Bulky storage provision for each individual apartment block is also proposed, having regard to this Section of the County Plan.

9.1.8.2 Minimum Apartment Floor Area

Section 12.3.5.5 Minimum Apartment Floor Areas states: -

“All apartment developments shall accord with or exceed the minimum floor areas indicated in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’, (2020), as set out in the Table 12.4 below. In this regard, the areas listed are minimum standards and should not be taken as the norm for all developments; higher floor areas will be encouraged throughout the County.

In order to safeguard standards, the majority of apartments in any proposed scheme of 10 or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 beds, by a minimum of 10% (excluding studios).”*

**Not applicable to BTR development in accordance with SPPR 8)”*

Table 12.4: Minimum Overall Apartment Floor Areas

Minimum Overall Floor Areas	
Studio	37 sq. m.
One bedroom	45 sq. m.
Two bedroom (3 persons)	63 sq. m.
Two bedroom (4 persons)	73 sq. m.
Three bedrooms	90 sq. m.

Figure 11: Extract of Table 12.4 Minimum Overall Apartment Floor Areas from Dún Laoghaire-Rathdown County Development Plan 2022-2028.

The Development Plan standards are consistent with SPPR 2 of the 2025 Design Standards for Apartments. As noted in section 9.1.3 above, Proposed Variation No.1 with Material Alteration No.1 remove this 3-bed 40% threshold and has informed the design of this scheme. SPPR2 states at least 25% of the proposed apartments shall exceed the minimum floor area standard for any combination of 1, 2 or 3-bed units, in accordance with SPPR2 of the Apartment Guidelines.

Applicant's Response

The proposed units meet or exceed the minimum floor area requirements, as set out in SPPR 2 of the 2025 Apartment Guidelines.

In addition, the Apartments Guidelines 2025, in an effort to increase the economic viability of apartment schemes, require that apartment schemes should exceed the minimum unit sizes of SPPR2 by 10%, for at least 25% of all apartment units. In this context, 26.8% of the proposed units exceed the minimum floor area sizes of SPPR 2 by 10%, which is comfortably above the min.25% of units standard.

As previously identified in Section 9.1.3 of this report, proposed Variation No. 1 to the Development Plan, relating to zoning, also seeks to align the residential mix standards of the Development Plan with the Apartment Guidelines 2025. The proposed scheme assumes the adoption of Variation No.1 in due course. Accordingly, whilst the proposed apartment mix does not comply with the current County Development Plan requirement for 40% 3-bed apartment provision, it is informed by the Apartment Guidelines 2025 and Draft Variation No.1, with amendment no. 17 deleting table 12.1 and its minimum requirement for 40% 3-beds entirely.

Amendment no. 17 of Draft Variation No.1 goes onto state that:

“In accordance with Specific Planning Policy Requirement 1 (a) and (b) of the Design Standards for Apartments Guidelines, statutory plans shall not impose restrictions on the mix of unit sizes or types within apartment developments, nor set minimum or maximum bedroom requirements—except in the case of social housing developments, social/affordable housing

under Part V or schemes for older persons informed by a Housing Need and Demand Assessment (HNDA). The HNDA prepared as part of the review of the County Development Plan will examine housing mix provision for social housing schemes, Part V and older persons housing.”

Additionally, the Proposed Material Alterations to Draft Variation No.1 were on public display until 26 June 2026. Proposed Material Alteration No. 8 removes the following wording:

‘the majority of apartments in any proposed scheme of 10 or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed, by a minimum of 10%’

The proposed apartment element has been designed having regard to forthcoming Variation No.1 and associated material alterations to the Development Plan and SPPR 2 of the Apartment Design Guidelines 2025.

We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, prepared by OMP Architects for compliance in regard to SPPR 2 and further details.

9.1.9 People, Homes and Place

Policy Objective PHP20: Protection of Existing Residential Amenity

“It is a Policy Objective to ensure the residential amenity of existing homes in the Built-Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.”

Applicant’s Response

The proposed development has been carefully designed to protect the amenities of adjoining properties. The land to the east, between the application site and the M11 is undeveloped. Housing to the east is buffered by the M11 corridor. Land to the south is as yet undeveloped between the application site and Old Connaught Avenue. The Festina Lente equestrian centre buffers existing housing to the southwest. A distance to the north of the site, the Ferndale Court apartment enclave is set within dense woodland, providing a visual buffer to the south in turn protecting their amenity.

Of note, the nearest existing dwelling is located immediately west of the application site known as ‘The Orchard’. Efforts have been made to ensure lower rise development is proposed next to it. Along the existing green boundaries to the north and west of The Orchard include Phase 1 – Road 1 as well as an Active Travel route. This provides a sufficient separation distance between the residential dwelling and new proposed development. The nearest proposed dwelling is located c.10m from the western boundary. Given The Orchard’s large garden, the distance to their northern boundary is c.16m, notwithstanding immediately to the north proposes a road which enlarges the separation distance. As noted in the Daylight, Sunlight and Overshadowing Assessment prepared by Modelworks on page 23 it is noted:

“The private dwelling (The Orchard, A98 YD25) is located to the south of the closest proposed buildings, at c. 40m. The dwelling was reviewed using the Decision Chart referenced in Figure 5 above to determine if a more detailed assessment for potential loss of daylight was required. However, given the low-rise nature of the proposed development and the separation distance between the proposed and existing building, it did not require a detailed assessment and therefore the impact on the receiving environment is expected to be Negligible”

Old Connaught House is located to the west, and also features a significant separation distance in the form of farmland in turn also protecting their respective amenity.

The nearest proposed dwellings in the south western corner of the application site are low rise houses, ensuring that the residential amenity of the nearest existing dwelling is well protected. Whilst Block 4 is located along the western boundary, this has been set back further from the boundary that lower rise housing and no sensitive existing residential development is located within its environs.

The accompanying Site Layout Plan, prepared by O’Mahony Pike Architects demonstrates that appropriate separation distances are achieved between the existing property boundary ‘The Orchard’ and the nearest proposed dwellings.

Policy Objective PHP27: Housing Mix

“It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.”

Applicant’s Response

As noted above in 9.1.3 of this report Proposed Variation No.1 also seeks to align the Development Plan standards with the ‘Planning Design Standards for Apartment, Guidelines for Planning Authorities (2025)’ and alteration no. 17 deletes Table 12.1 of the Development Plan entirely, which includes a need for a minimum 40% 3+ bedroom units.

We refer the Planning Authority to the Schedule of Accommodation, prepared by O’Mahony Pike Architects for detailed breakdown in respect to the proposed developments residential unit Mix. We note that the proposed development provides for a mixture of houses, duplexes and apartments.

Policy Objective PHP36: Inclusive Design & Universal Access

“It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.”

Applicant’s Response

12.5% of the proposed apartment units are designed to Universal Design standards.

There is also a range of unit sizes from 1 bed to 4 beds to suit many different prospective residents.

Additional information on Universal Design can be found in the Architectural Design Statement, prepared by O’Mahony Pike Architects.

Policy Objective PHP44: Design Statements

“It is a Policy Objective that, all medium-to-large scale and complex planning applications (30+residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a ‘Design Statement’ and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the ‘Urban Design Manual - A Best Practice Guide’ (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.”

Applicant’s Response

We refer the Planning Authority to the enclosed Architectural Design Statement, prepared by O’Mahony Pike Architects, which responds to the design criteria set out in Section 4.4 – Key Indicators of Quality Design and Placemaking of the Sustainable Residential Development and Compact Settlement Guidelines (2024).

9.1.10 Transport**Policy Objective T17: Travel Plans**

“It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car-based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES).”

Applicant's Response

We refer the Planning Authority to the enclosed **Mobility Management Plan**, prepared by AtkinsRéalis Consulting Engineers, which encourages more sustainable modes of transport and reduce reliance on car use.

Policy Objective T18: Car Sharing Schemes

"It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements."

Applicant's Response

2no. dedicated car-sharing spaces will be delivered within convenient, accessible and highly visible locations.

They will be available for use by all residents of the development and the public, providing access to a vehicle without the need for car ownership.

We refer the Planning Authority to the enclosed **Mobility Management Plan**, prepared by AtkinsRéalis Consulting Engineers.

Policy Objective T19: Carparking Standards

"It is a Policy Objective to manage carparking as part of the overall strategic transport needs of the County in accordance with the parking standards set out in Section 12.4.5."

Applicant's Response

A total of 289no. spaces are proposed as part of this development.

We refer the Planning Authority to the enclosed **Traffic and Transport Assessment**, prepared by AtkinsRéalis Consulting Engineers.

Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits

"It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines."

Applicant's Response

We refer the Planning Authority to the enclosed **Traffic and Transport Assessment**, prepared by AtkinsRéalis Consulting Engineers which concludes: -

"The proposed development can be accommodated on the transport network without significant adverse impacts, while actively contributing to the delivery of a sustainable, well-connected community in accordance with the Old Conna LAP vision."

Additionally, we refer the Planning Authority to the enclosed **Quality Audit**, prepared by AtkinsRéalis Consulting Engineers.

Policy Objective T27: Traffic Noise

“It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.”

Applicant’s Response

We refer the Planning Authority to the enclosed **Environmental Noise and Vibration Impact Assessment**, prepared by Traynor Environmental Ltd. Road traffic associated with the N11/M11 corridor and the surrounding local road network have been considered in accordance with best practice guidelines.

9.1.11 Part V**Policy Objective PHP31: Provision of Social Housing**

*“It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’. The Affordable Housing Act 2021 provides for **20% for social and affordable homes.**”*

Applicant’s Response

We refer the Planning Authority to the **Part V proposal**, prepared by O’Mahony Pike Architects, which confirms that 20% Part V social and affordable housing is to be provided. Details of indicative construction and development costs and management service charges are also set out.

9.1.12 Public Lighting**Policy Objective T30: Street Lighting**

“It is a Policy Objective to provide and maintain street lighting on the public road/footway/ cycleways throughout the County in accordance with commonly accepted best practice, the Council’s public lighting masterplan and the upgrade of sodium lights to LEDs.”

Section 12.9.10.2 Street Lighting states: -

“The lighting of roads and public amenity areas shall be provided in accordance with the requirements of Public Lighting Standards BS5489-1 EN 13201:2015, and further updates.

In general, for security and road safety reasons, street lighting may be provided for car and cycle parking areas, new access roads and along cycle/ pedestrian routes within new developments, all as per the Council requirements. Details of the column height and spacing, and lantern type, lighting class and lux levels and energy efficiencies shall be provided. Low pedestrian lighting bollards (1 metre to 2 metre height), under rail lighting and low-level wall mounted lighting (below 4m) are not recommended along pedestrian routes on electrical safety and maintenance grounds. Where new junctions are created as a result of new developments, additional lighting poles may be required on the public roads opposite the junction. In such cases an assessment of the adequacy of the street lighting should be undertaken with details of light intensity/ lux levels provided.

Street Lighting shall also be considered having regard to any signage, associated lighting or any other structure along roads running parallel to or buildings alongside the railways. In this regard reference, to and requirements of TII’s ‘Code of engineering practice for works on, near, or adjacent the Luas light rail system’ and TII’s Light Rail Environment - Technical Guidelines for Development PE-PDV-00001 December 2020 (or any superseding document) should be made.”

Applicant’s Response

We refer the Planning Authority to the enclosed **External Lighting Plans and Report**, prepared by Sabre which has had regard to the provisions of the Development Plan.

9.1.13 Green Infrastructure and Biodiversity

Policy Objective GIB6: Views and Prospects

“It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.”

Applicant’s Response

We refer the Planning Authority to the enclosed **Landscape and Visual Impact Assessment**, prepared by Model Works which concludes: -

“The visual impact has been assessed as ‘moderate neutral’ for the eastern half of the walled garden (Viewpoint 9) and ‘slight neutral’ (Viewpoint 10) for the more formal western half. The impact may be considered by some to be negative (due to the ‘encroachment’ of modern development into the view from an holistic enclosed garden). However, the planned/changing context must be recognized. The walled garden has been identified as a signature open space and community/cultural asset of a new urban neighborhood.

The overall landscape effects are classified ‘moderate neutral’, and the proposal can be considered an appropriate intervention in the landscape. The development would initiate the planned urban expansion of Bray into the Old Connaught area and would establish a high standard of design (for layout/urban grain, architecture and the public realm/landscape) that would serve as a benchmark for subsequent phases. While the development may initially appear somewhat incongruous in the peri-urban landscape, this is unavoidable for the first phase of a planned transformation. As the LAP is further implemented, the development would be increasingly integrated into the evolving urban environment and would contribute positively to the creation of a coherent, attractive and distinctive new neighbourhood.”

Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance

“It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance – including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species – are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and ‘Ecological Guidance Notes for Local Authorities and Developers’ (Dún Laoghaire-Rathdown Version 2014).”

Policy Objective GIB25: Hedgerows

“It is a Policy Objective to retain and protect hedgerows in the County from development, which would impact adversely upon them. In addition, the Council will promote the protection of existing site boundary hedgerows and where feasible require the retention of these when considering a grant of planning permission for all developments. The Council will promote the County’s hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance. The Council will promote the protection of existing hedgerows when considering a grant of planning permission for all developments.”

Applicant’s Response

We refer the Planning Authority to the **Appropriate Assessment Screening Report** and **Ecological Impact Assessment Report**, prepared by Brady Shipman Martin Built Environment Consultants.

The Appropriate Assessment Screening report concludes that: -

“As identified through detailed hedgerow survey (May 2026), the site does support habitats of Local to County ecological importance, specifically three Heritage Hedgerows and one hedgerow of County Importance. These features provide valuable habitat connectivity but do not correspond to any Annex I habitat types.

While noting the presence of the hedgerows and tree lines, is assessed as being of Local Importance (Lower Value). The habitats present on-site are of limited ecological value and support only common, widespread species. The most significant ecological features in the wider area - specifically the hedgerows (WL1) and treelines (WL2) classified as Heritage Hedgerows and County Importance - are located outside the red line boundary and will not be directly impacted by the proposed development.”

The Ecological Impact Assessment Report concludes that: -

“The proposed development responds comprehensively to the requirements identified in the Biodiversity Officer’s Opinion. The landscape design integrates biodiversity value throughout the site through native planting, habitat connectivity, and nature-based solutions, while maintaining compliance with Old Connaught LAP requirements for density and infrastructure. Comprehensive baseline surveys and specialist expertise inform all mitigation recommendations, and systematic monitoring will demonstrate the ecological benefits of the proposed development in the medium to long term.

The development will result in significant ecological enhancement compared to the current agricultural baseline, with habitat value increasing as the proposed native planting becomes established.”

Policy Objective GIB29: Nature Based Solutions

“It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County, and to promote and apply adaptation and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flood management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.”

Applicant’s Response

We refer the Planning Authority to the **Storm Water Impact Assessment Report** and **Flood Risk Assessment**, prepared by AtkinsRéalis Consulting Engineers, which confirms permeable paving, tree pits, and extensive green roofs are included within the SuDS strategy.

9.1.14 Public Open Space

Policy Objective OSR4: Public Open Space Standards

“It is a Policy Objective to promote public open space standards generally in accordance with overarching Government guidance documents ‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’, (2009), the accompanying ‘Urban Design Manual – A Best Practice Guide’, and the ‘Sustainable Urban Housing: Design Standards for new Apartments’, (2020).”

Applicant’s Response

We refer the Planning Authority to **Drawing No. 7245-BSM-00-ZZ-DR-L-300 Landscape Masterplan**, prepared by Brady Shipman Martin Built Environment Consultants.

The proposal contains two main areas of public open spaces, one to southeastern side and one to the northwestern side.

The eastern public open space retains an existing veteran Oak tree which is large in size and provides important ecology and placemaking functions. It is located centrally around the larger public open space which also features play area with a natural play elements located adjacent the veteran Oak tree.

The western space integrates existing vegetation along its southern boundary, facilitates access to the active travel route and visual connectivity between the wider scheme and the future Luas corridor, promoting both active travel and public transport.

9.1.15 Environmental Infrastructure and Flood Risk

Policy Objective EI1: Sustainable Management of Water

“It is a Policy Objective to work with Irish Water:

- *To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water in a manner that supports climate action, the circular economy, a healthy society and protection of the environment. (Consistent with NSO 9 of the NPF, RSO 7, RPO 10.1 of the RSES)*
- *To continue the development and improvement of the water supply and wastewater systems throughout Dún Laoghaire-Rathdown in order to meet the anticipated water and wastewater requirements of the County.*
- *To ensure facilities comply with the Water Framework Directive and the River Basin Management Plan or any updated version of the document, ‘Water Quality in Ireland 2013-2018’ (2019) or any updated version of the document, Pollution for Designated Shellfish Areas, the Urban Wastewater Treatment Directive and the Habitats Directive.”*

Policy Objective EI3: Wastewater Treatment Systems

“It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly.”

Policy Objective EI4: Water Drainage Systems

“It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)

Policy Objective EI6: Sustainable Drainage Systems

“It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).

Policy Objective EI7: Water Supply and Wastewater treatment and Appropriate Assessment

“It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity defined by the structure and function, of any European sites and that the requirements of Article 6 of the EU Habitats Directive are met (Consistent with RPO 10.7 of the RSES).”

Applicant’s Response

In accordance with the Old Connaught LAP, the proposed development connects to an overall foul drainage strategy that serves the central, western, southern and part of the northern character areas via the proposed Old Connaught Pump Station.

A new foul sewer network is proposed within the site, discharging to a new pump station before connecting to the existing network at Old Connaught Avenue and ultimately to the Bray Pump Station and Shanganagh Wastewater Treatment Plant. The strategy includes the long-term solution, with the construction of a new pumping station and twin rising mains connecting east along Old Connaught Avenue, under the N/M11, to the existing gravity foul network. The network has been designed in accordance with Uisce Éireann standards.

Consent to make this planning application has been obtained from Dun Laoghaire Rathdown County Council due to the proposed works extending along the Old Connaught Bridge and the trenchless crossing of the M11.

We refer the Planning Authority to the **Engineering Planning Report**, prepared by AtkinsRéalis Consulting Engineers, and to the **Appropriate Assessment Screening Report**, prepared by Brady Shipman Martin Built Environment Consultants.

9.2 Old Connaught Local Area Plan 2025

The Old Connaught Local Area Plan 2025 was adopted on 9 December 2025.

The layout and design of the proposed development has been guided by this LAP.

The table in Section 9.2.2 below provides an overview of the Objectives contained within the Old Connaught Local Area Plan 2025 (“the LAP”), of particular relevance to the proposed development and the Applicant’s summary response to each.

It is acknowledged that the Council’s approach in preparing the LAP was holistic and that the Applicant has followed through on that approach in devising these proposals.

9.2.1 Phasing Requirement of Local Authority Plan – Pump Station Provision

The subject site located in **Phase A-sub phase 1** of the LAP Phasing Strategy. Section 11.3.1 of the LAP which relates to Phase A lands states:

“Based on an assessment of infrastructure requirements, Phase A incorporates an initial sub-phase (‘sub-phase 1’) where limited residential development may be facilitated (c. 450 units), supported by existing infrastructure capacity, interim measures including wastewater infrastructure and additional enabling infrastructure proportionate to the scale of development, see Table 11.1”

In relation to the Wastewater pumping station, Table 11.1 states that the Requirement is for:

“Planning permission to be in place prior to, or in tandem with, any permission being granted in sub-phase 1 for new residential development. Works to be completed prior to the occupation of any new residential development.”

Table 11.1 Old Connaught Phase A – Infrastructure Phasing Table

Phase A	Approx New Homes	Infrastructure	Requirement
Sub-Phase 1	c.450 units	Partial delivery of the new north-south link road (connecting Old Connaught Avenue and Crinken Lane / Ballybride Road) adjoining Phase A residential plots.	To be included and delivered as part of planning applications for residential development. To be completed to a standard to be Taken in Charge. All roads must deliver connectivity with adjoining road network/landholdings as required to achieve continuation in development.
		Active travel infrastructure.	Active travel infrastructure, as per the requirements of the Old Connaught active travel network, to be determined and agreed with the Planning Authority and included as part of planning applications for development.
		Wastewater pumping station.	Planning permission to be in place prior to, or in tandem with, any permission being granted in sub-phase 1 for new residential development. Works to be completed prior to the occupation of any new residential development.
		Wastewater network connection - interim proposal to install a rising main in the footpath duct in the Old Connaught Avenue overbridge (subject to further assessment) / permanent proposal for a trenchless motorway connection to existing wastewater network to the east.	Planning permission to be in place prior to, or in tandem with, any permission being granted in sub-phase 1 for new residential development. Works to be completed prior to the occupation of any new residential development.
		Incremental expansion of the water, wastewater and drainage networks.	To be included and delivered as part of planning applications for development.
		Primary area wide attenuation pond / Interim measures.	Requirement as part of sub-phase 1 to be assessed. Potential for local interim solutions to be considered and agreed with the Planning Authority.
		Electricity infrastructure upgrades.	All planning applications will be subject to capacity constraints and assessed on a case-by-case basis.

Figure 12: Extract of Table 11.1 Old Connaught Phase A – Infrastructure Phasing Table from Old Connaught Local Area Plan 2025.**Applicant's Response**

In accordance with the Table 11.1 infrastructure phasing requirements, the proposed development includes a North-South link road, with vehicular and active travel (pedestrian and cycle) access, extending from Old Connaught Avenue and with the capacity to link with future development lands to the north.

It is further confirmed that as part of the proposed LRD for 271no. dwellings, it is proposed to construct a new pumping station, twin rising mains extending circa 400m along Old Connaught Avenue under the M11 to connect to the existing gravity foul network c. 125m to the east of the M11 bridge, associated storage, together with all associated site development and reinstatement works required to facilitate these elements.

The design of the proposed foul pumping station and rising main has been prepared by AtkinsRealis Consulting Engineers in close consultation with Uisce Eireann and Dun Laoghaire Rathdown County Council.

The proposed scheme is thus fully compliant with the Table 11.1 infrastructure phasing of the LAP.

9.2.2 Old Connaught LAP Objectives

Objective OCLAP1	Applicant's Response
<i>It is Policy to progress the development of Old Connaught as a low carbon and climate resilient community.</i>	We refer to the Sustainability Report , prepared by Delap and Waller for further detail on climate sustainability. The scheme includes cycle parking and associated infrastructure to reduce car dependency.
Objective SDF2	Applicant's Response
<i>It is an Objective that a Masterplan is prepared by the Applicant(s) for significant development within each Character Area, for lands within the Applicant's ownership. The Masterplan shall accord with the objectives set out in the SDFs and be accompanied by a 'Consistency Statement' detailing how each of the objectives, where applicable, are to be achieved. The Masterplan shall include details of how the overall scale of development is to be delivered in accordance with the phasing LAP Boundary dlr County Boundary Northern Character Area Central Character Area Village Core Western Character Area Southern Character Area and implementation strategy set out in Chapter 11</i>	We refer to the enclosed Architectural Design Statement , and most specifically to 'Masterplan' Drawing No. 24004-OMP-00-SP-DR-A-1100 , prepared by O'Mahony Pike Architects. For the Planning Authorities benefit a wider landownership plan has also been provided.
Objective OCLAP3	Applicant's Response
<i>It is Policy to promote a high standard of urban design throughout Old Connaught in accordance with the relevant policies set out in the County Development Plan, Section 28 Guidelines and other relevant guidance documents including: the 'Compact Settlement Guidelines' (2024), and the Design Manual for Urban Roads and Streets (2019). Development shall be design-led, prioritising place making and be informed by the Key Indicators of Quality Design and Placemaking set out in the 'Compact Settlement Guidelines' (2024).</i>	We refer to the Section 9.1 of this report, prepared by Stephen Little & Associates for further details.
Objective OCLAP6	Applicant's Response
<i>It is Policy to encourage the co-location of existing and future sustainable neighbourhood facilities including community centres, schools, childcare facilities, healthcare services and also co-location of playgrounds and amenity spaces in accordance with Policy Objective PHP5 in the dlr County Development Plan 2022-2028. Such an approach may enable the sharing of facilities such as car and cycle parking.</i>	The proposed development includes a childcare facility at ground floor of apartment block C (c. 574 sq. m). The playground is located near the public open space beside the creche. We refer to the architectural drawings, prepared by O'Mahony Pike Architects.
Objective OCLAP10	Applicant's Response
<i>It is Policy to support and facilitate the provision of childcare facilities within the Plan area to ensure that existing and future residential population have access to childcare services. In this regard:</i> • All planning applications for larger residential developments to be required to provide one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units,	The proposed development includes a childcare facility at ground floor of apartment Block 3 (c. 574sq. m). While the likely demand arising from the proposed development is 43no. childcare spaces, the proposed creche is designed with an estimated capacity of c. 90 childcare places. In response to the LRD Opinion, the creche is proposed to be included with this Phase 1 of the Central Character Area and it is requested the creche should only need to be delivered

<i>unless it can be satisfactorily demonstrated that there is already an adequate provision in the area.</i> • <i>At least one childcare facility shall be provided within lands</i> • <i>At least one childcare facility shall be provided within each The provision of childcare facilities within the Plan area shall be carried out in accordance with the provisions set out under Policy Objective PHP6 ‘Childcare Facilities’ and Section 12.4.10 ‘Childcare Facilities – Parking & Access’ of the County Development Plan 2022-2028 and/or any subsequent plan and the provisions of the DoEHLG ‘Childcare Facilities Guidelines for Planning Authorities’ (2001) or any updated Guidelines.</i>	following competition and occupation of all Phase 1 housing, in efforts to ensure sufficient population reside in the area to support the creche. Refer to Drawing No. 24004-OMP-B3-ZZ-DR-A-1000 and architectural design statement, prepared by O’Mahony Pike Architects.
Objective OCLAP14	Applicant’s Response
<i>It is Policy to promote Universal Design in all proposals for community facilities and publicly accessible buildings and spaces in order to ensure that all buildings and associated public realm can be utilised to the greatest extent possible by all people, regardless of age, ability or disability. In this regard, proposed development should have regard to the provisions of ‘Building for Everyone: A Universal Design Approach’ series of booklets by the National Disability Authority and Centre of Excellence in Universal Design.</i>	The proposed units meet or exceed the minimum floor area requirements, per SPPR 2. The Apartment Design Standards 2025 reduced the requirement for the majority of units to exceed the minimum sizes. The relevant minimum threshold is now 25% of all units to exceed the minimum sizes by 10%. In this context, 26.8% of the proposed units exceed the minimum floor area. We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, prepared by OMP Architects for compliance in regard to SPPR 2 and further details.
Objective WB7	Applicant’s Response
<i>It is Policy to support and facilitate the 4 Strategic Priorities set out within the dlr Age Friendly Strategy 2022-2028, in particular Strategic Priority 1. In this regard:</i> • <i>Public realm should seek to facilitate social interaction and healthy lifestyles. As part of the Plan process, the overall development lands at Old Connaught were further analysed and progressed from that provided in the Core Strategy of the DLR County Development Ferndale Court, Allies River Road residential land uses to net residential development areas, see Chapter 4 – Spatial Strategy and Site Development Frameworks.</i> • <i>Safe and accessible transport and infrastructure will be promoted (see Chapter 6).</i> • <i>Lifetime adaptable housing options will be facilitated (see Section 5.3.4.4).</i>	We refer to Section 8 of the Architectural Design Statement, prepared by O’Mahony Pike Architects, for details of Universal Design and Age Friendly design incorporated into the proposed development.
Objective OCLAP17	Applicant’s Response
<i>It is Policy to:</i> • <i>Promote and support residential densities in line with Policy Objective PHP18 of the dlr County Development Plan 2022 – 2028 (or any subsequent Plan) and the ‘Sustainable Residential Development and Compact Settlements Guidelines’, 2024.</i>	The proposed density of 76.2dph is consistent with the Sustainable Residential and Compact Settlement Guidelines 2024 and Dún Laoghaire-Rathdown County Development Plan 2022-2028.

• Provide a plan-led approach to residential density standards within the Plan area. In this regard, residential density shall generally accord with the standards set out in Section 4.3.2 'Residential Density' and Figure 4.2 and further detailed in Section 4.4.2 'Site Development Frameworks', both included in Chapter 4 – Spatial Strategy and Site Development Frameworks. • Minor deviations from the residential density standards set out in Section 4.3.2 'Residential Density' may be considered by the Planning Authority on a case-by-case basis to allow for a range of potential design solutions. • Residential density at lands including regeneration and infill sites will be assessed on a case-by-case basis by the Planning Authority in response to inter alia the scale and form of surrounding development.	
Objective OCLAP18	Applicant's Response
It is Policy that building heights in Old Connaught shall generally be in accordance with the height parameters set out in Section 4.3.3 'Building Heights' and further detailed in Section 4.4.2 'Site Development Frameworks', both included in Chapter 4 – Spatial Strategy and Site Development Frameworks. Having regard to SPPR3 in the Section 28 Building Height Guidelines (2018), there may be instances where an argument can be made for increased height. In circumstances where compliance with Policy Objective BHS2 of the dlr County Development Plan 2022-2028 (see Appendix 5) can be demonstrated additional height may be appropriate, subject to complying with; the safeguards outlined in the CDP, the policies and objectives of this Plan and the performance based criteria set out in Table 5.1 of the dlr Building Height Strategy (see Appendix 5 of the dlr County Development Plan 2022-2028).	The proposed building heights (2-5 storeys) is in accordance with the height parameters set out in the Building Height Guidelines. We refer the Planning Authority to the height diagram & associated text in the Architectural Design Statement, prepared by O'Mahony Pike Architects. The only slight deviation from the LAP height parameters relates to proposed Block 3. The LAP suggests that a building in this location should be a maximum of four storeys. However, the location of Block 3 demarcates an important entrance into the Old Connaught Settlement from the north, and therefore the building serves a gateway function. The increase in the proposed building height of Block 3, stepping from 4 to 5-storeys was discussed with DLRC at both the S247 and LRD Stage 2 meetings, and was received favourably by the local authority on both occasions.
Objective OCLAP19	Applicant's Response
It is Policy that all new residential developments within the Plan area shall accord with the mix requirements set out in Policy Objective PHP27: Housing Mix and Section 12.3.3.1 of the dlr County Development Plan 2022-2028. In this regard, all planning applications for residential development within the Plan area shall provide for a suitable mix of house types and sizes that meet the needs of a range of households and should incorporate flexible housing units that can be adapted to suit changing household needs.	The proposed scheme includes the following unit mix: - 1 Bed Apartment : 49 2 Bed Apartment: 113 3 Bed Duplex (5P): 6 2 Bed Houses (3P): 13 3 Bed Houses (4P): 68 4 Bed Houses: 22
Objective OCLAP20	Applicant's Response
It is Policy to support and promote housing options for older people and persons with a disability within the Plan area, including purpose built accommodation and housing options PHP30 in the dlr CDP 2022-2028. In this	We refer to section 8 of the Architectural Design Statement, prepared by O'Mahony Pike Architects.

<i>regard, new residential developments shall be required to incorporate an appropriate quantum of housing units that:</i> <i>• Promote aging in place opportunities for older persons to 'right size' within their community.</i> <i>• Take account of all abilities through the principles of universal homes design.</i> <i>• Facilitate adaptable layouts to suit changing needs.</i> <i>• Any proposed development for purpose-built accommodation for a specific need or group shall demonstrate how this objective can be secured long-term.</i>	
Objective SUV2	Applicant's Response
<i>It is an Objective to ensure the provision of a range of housing options within the Plan area, that take account of all ages and abilities as residents progress through different stages of life, that all new residential developments of 10+ units shall include a minimum of 25% of the total housing stock that is designed to facilitate an ageing population / people with a disability. In this regard, the following provisions should be taken into account in the design and location of such units:</i> <i>• Units should be designed having regard to the universal design homes principles.</i> <i>• Insofar as possible, units should be located at ground floor level with own door access.</i> <i>• Ideally, units should be located where residents have a short walk to site entrances that adjoin public transport links and amenities within or adjacent to the proposed development.</i> <i>• To assist with ease of access to public transport links and amenities, landscaping within any new developments shall be designed having regard to ease of movement and legibility for all users.</i>	The proposed units meet or exceed the minimum floor area requirements, per SPPR 2. The Apartment Design Standards 2025 reduced the requirement for the majority of units to exceed the minimum sizes. The relevant minimum threshold is now 25% of all units to exceed the minimum sizes by 10%. In this context, 26.8% of the proposed units exceed the minimum floor area. We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, prepared by OMP Architects for compliance in regard to SPPR 2 and further details.
Objective OCLAP21	Applicant's Response
<i>• To support the delivery and integration of social and affordable housing within the Plan area and to pursue further opportunities for social and affordable housing in an integrated manner, through 'Part V' housing, Council own build, Affordable Housing schemes and/or delivery through Approved Housing Bodies, in accordance with Policy Objective PHP31 in the dlr County Development Plan 2022-2028 and the Council's Housing Strategy and HNDA.</i> <i>• To support new and innovative ways to meet housing demands in the Plan area while also ensuring that there is an appropriate mix of tenure and dwelling types provided to meet the needs of the current and future residents of Old Connaught.</i>	We refer to the enclosed Part V Proposal, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants on behalf of the Applicant, together with a Part V Proposal Report, June 2026, prepared by O'Mahony Pike Architects. The applicant is proposing 55no. Part V units (20%), including apartments in Block C, duplexes in Block 1 and houses.
Objective OCLAP24	Applicant's Response

<i>It is Policy to co-ordinate and co-operate with Transport Infrastructure Ireland, the Department of Transport, the National Transport Authority and Wicklow County Council to progress the N11/M11 Junction 4 to Junction 14 Improvement Scheme and/or the N11/M11 Bus Priority Interim Scheme, as appropriate.</i>	Note that N11/M11 is located generally east of the site and the reserved corridor is not encroached by the proposed housing development. The proposed foul pump twin rising mains extend along Old Connaught Ave, under the N11/M11. A letter of consent to make this application has been obtained from DLRCC.
Objective OCLAP25	Applicant's Response
<i>It is Policy to protect motorways and national routes and associated junctions in accordance with the Section 28 Guidelines 'Spatial Planning and National Roads' (2012). The Council will protect the preferred route corridor of the N11/M11 Junction 4 to Junction 14 Improvement Scheme and prohibit development that could prejudice its future delivery.</i>	The proposed development has also been designed to safeguard the reserved M11 corridor, with this area remaining untouched, thereby preserving the delivery of future strategic transport infrastructure while enabling the phased development envisaged under the LAP. Per TII comments, a NIA has been prepared to demonstrate no undue harm will arise from new residential development within proximity to the M/N11.
Objective OCLAP27	Applicant's Response
<i>It is Policy objective of this Plan that the extension of the Luas Green Line to Bray be recognised as critical enabling infrastructure.</i>	The future LUAS corridor is protected within the proposed scheme, aligned along the proposed North-South link road. We refer to the engineering drawings, prepared by AtkinsRéalis Consulting Engineers.
Objective OCLAP29	Applicant's Response
<i>It is Policy to actively support sustainable modes of transport at Old Connaught and ensure that land uses are aligned with the development of high-quality public transport systems.</i>	The proposed scheme includes an active travel route along the proposed North-South link Road, to facilitate pedestrian and cycle linkage to the proposed housing and future development phases. A total 435no. bicycle parking spaces is proposed, including Sheffield stands and semi-vertical bicycle stands, consistent with DLRCC cycle manual. We refer to the Architectural Design Statement, prepared by O'Mahony Pike Architects.
Objective OCLAP30	Applicant's Response
<i>It is Policy to promote and facilitate the '10-minute' settlement concept at Old Connaught where a range of facilities and services are accessible in a short walking and cycling timeframe from homes or are accessible by high quality public transport located within a short walk from home.</i>	The site is located c. 10 minute walking distance to the nearest bus stop (Old Connaught Avenue Stop 4201) which affords access to E1 bus spine as part of bus connects. Consultation has taken place between Atkins and the NTA and TII via the Planning Authority as part of preparation of this application. Provision has been made for two new bus stops along the main North-South link road, which will reduce walking times further when a future bus service comes on board.
Objective OCLAP32	Applicant's Response
<i>It is Policy to support the delivery of enabling transport infrastructure in a planned and sequential manner in accordance with the Phasing Strategy set out in Chapter 11 – Phasing and Implementation.</i>	We refer to the Site Layout Plan prepared by O'Mahony pike Architects. This provides details of the North-South link road, with active travel route and aligned 7m wide Luas reservation corridor, provided in accordance with the infrastructure phasing requirements of the LAP.
Objective TM2	Applicant's Response
<i>It is an Objective to ensure that future transport infrastructure within the Plan area is designed to be accessible to all. The following guidance in particular should be referred to:</i> • <i>Design Manual for Urban Roads and Streets (DMURS).</i>	We refer to the Traffic and Transport Assessment Report and DMURS Statement both prepared by AtkinsRéalis Consulting Engineers .

• Centre for Excellence in Universal Design (National Disability Authority). • Age-Friendly Ireland.	
Objective TM4	Applicant's Response
<i>It is an Objective:</i> • To provide a plan-led approach to the delivery of a connected active travel network across the Plan area. Subject to detailed design, the intended routing, function and purpose of the active travel network (as illustrated in Figures 6.12 and 6.15) shall, where practicable, be achieved. Further details with regards to the proposed active travel network is set out in Chapter 4 – Spatial Strategy and Site Development Frameworks, and Chapter 11 – Phasing and Implementation. • That as part of the development management process, proposals for new development in the Plan area must demonstrate how the proposal positively contributes to the proposed network of pedestrian and cycle linkages within the Plan area. • That deviations from the proposed active travel network, as illustrated in Figures 6.12 and 6.15, may be considered by the Planning Authority on a case-by-case basis to allow for flexibility in scheme design.	We refer to the Site Layout Plan prepared by O'Mahony pike Architects. This provides details of the North-South link road, with active travel route, bus stops, and the aligned 7m wide Luas reservation corridor, provided in accordance with the infrastructure phasing requirements of the LAP. We refer also to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM5	Applicant's Response
<i>It is an Objective:</i> • To prioritise walking and cycling in the internal route hierarchy, to create a network of walking and cycling routes within the Plan area and to improve circulation and permeability. • That all proposed access points, routes and streets must connect logically with the existing/proposed street network to aid legibility, permeability and walkability and also must complement local user desire lines. • To ensure that active travel network provides attractive, legible and direct links to the neighbourhood centre, schools, public transport, parks, amenities and services, and the wider area outside the Plan boundary.	We refer to the Site Layout Plan prepared by O'Mahony pike Architects. This provides details of the North-South link road, with active travel route, bus stops, and the aligned 7m wide Luas reservation corridor, provided in accordance with the infrastructure phasing requirements of the LAP. We refer also to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM6	Applicant's Response
<i>It is an Objective to enhance pedestrian and cycle safety through the provision of safe road junctions, improved pedestrian crossing facilities and the incorporation of appropriate cycle measures including signalised crossings where necessary. Ensure that, where appropriate, all pedestrian and cycle routes whether active travel route, permeability routes and urban greenway are fully lit.</i>	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM7	Applicant's Response
<i>It is an Objective to progress opportunities for filtered permeability across the Old Connaught area which support improvements in active travel whilst maintaining access for existing</i>	We refer to the Site Layout Plan prepared by O'Mahony pike Architects. This provides details of the North-South link road, with active travel route, bus stops, and the aligned 7m wide

vehicular users. Proposals for filtered permeability interventions will be subject to detailed design and development and will incorporate public engagement as part of the process.	Luas reservation corridor, provided in accordance with the infrastructure phasing requirements of the LAP. We refer also to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM8	Applicant's Response
<i>It is an Objective that new development or significant re-development proposals will be required to maximise permeability and connectivity for pedestrians and cyclists where practicable and appropriate.</i>	We refer to the Site Layout Plan prepared by O'Mahony pike Architects. This provides details of the North-South link road, with links from housing and POS to active travel route, bus stops, and the aligned 7m wide Luas reservation corridor, providing permeability through the site and to future development lands, in accordance with the infrastructure phasing requirements of the LAP. We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers.
Objective OCLAP34	Applicant's Response
<i>It is Policy to provide high quality cycle parking and cycle storage facilities across the Old Connaught LAP area in accordance with inter alia the provisions of the dlr County Development Plan 2022-2028, the Sustainable Residential Development and Compact Settlements Guidelines (2024) and the NTA's Cycle Design Manual.</i>	The proposed scheme includes total 435no. bicycle parking spaces within the application site. We refer to the Old Connaught Phase 1 LRD Quality Audit which includes a cycle audit, prepared by AtkinsRéalis Consulting Engineers
Objective TM9	Applicant's Response
<i>It is an Objective to:</i> • Provide for safe and secure cycle parking at appropriate locations within the Plan area and in particular close to the neighbourhood centre, schools, parks, recreation and community facilities and residential units. • Provide for the integration of cycle parking at public transport stops across the Plan area.	The proposed scheme includes total 435no. bicycle parking spaces. We refer to the Old Connaught Phase 1 LRD Quality Audit which includes a cycle audit, prepared by AtkinsRéalis Consulting Engineers
Objective OCLAP35	Applicant's Response
<i>It is Policy to facilitate and promote bus priority measures, where required, across the Plan area.</i>	The north south road includes provision for bus stops. We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers, for further detail on bus priority measures.
Objective TM11	Applicant's Response
<i>It is an Objective to support and facilitate the development of an integrated public transport network at Old Connaught, in association with relevant transport providers, agencies and stakeholders.</i>	The north south road includes provision for bus stops. The LUAS reservation corridor is also provided for, per the requirements of the LAP. We refer the Planning Authority to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers
Objective TM12	Applicant's Response
<i>It is an Objective to engage with the NTA, as the responsible statutory body, to facilitate the extension of the bus network to provide high frequency bus services to support planned population growth in the Old Connaught area.</i>	Consultation has taken place between Atkins and the NTA and TII via the Planning Authority as part of preparation of this application.
Objective TM13	Applicant's Response
<i>It is an Objective to work with the NTA to determine the location and siting of bus stops with shelters, where feasible, within the Plan area in a manner that:</i>	Consultation has taken place between Atkins and the NTA and TII via the Planning Authority as part of preparation of this application.

• Minimises walking distances between primary origin and destination land uses and bus stops. • Is fully accessible to all users and is aligned with safe, secure and well-lit routes and crossing points on desire lines. • Incorporates additional place-making opportunities and wayfinding signage where appropriate.	
Objective TM19	Applicant's Response
It is an Objective to provide a plan-led approach to the delivery of a connected vehicular transport network across the Plan area. Subject to detailed design, the intended routing, function and purpose of the vehicular transport network (as illustrated in Figure 6.14) shall, where practicable, be achieved and shall be subject to compliance with TII Publications where applicable. Further details with regards to the proposed vehicular transport network is set out in Chapter 4 – Spatial Strategy and Site Development Frameworks, and Chapter 11 – Phasing and Implementation.	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers . We additionally, note the LAP proposals have been integrated into the design of the proposed layout.
Objective TM20	Applicant's Response
It is an Objective, in conjunction and co-operation with the relevant transport bodies and authorities to secure improvements to the local road network at Old Connaught whilst ensuring that the priority is still sustainable transport modes, subject to compliance with TII, NTA and other relevant publications where applicable.	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM21	Applicant's Response
It is an Objective that road schemes will be designed, as appropriate, to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision, including the delivery of on-line walking and cycling facilities and where applicable off-line facilities where this is considered to be a more attractive solution for these modes.	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM22	Applicant's Response
It is an Objective to progress opportunities for the re-allocation of existing road space for sustainable transport, active travel and/or public realm improvements.	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM24	Applicant's Response
It is an Objective to create multi-functional streets, where appropriate, that balance 'movement' and 'place' and safety for all users within a traffic calmed environment.	We refer to the DMURS report and Quality Audit, prepared by AtkinsRéalis Consulting Engineers .
Objective TM25	Applicant's Response
It is an Objective to support a low-speed environment, where appropriate, across the Plan area. The road layout of new residential, commercial, and/or mixed-use developments	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .

<i>shall be designed in accordance with DMURS which seeks to create self-enforcing 30km/h zones.</i>	
Objective TM26	Applicant's Response
<i>It is an Objective to review and assess the need for Transition Zones and Gateways at Old Connaught, subject to compliance with TII Publications.</i>	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM27	Applicant's Response
<i>It is an Objective to seek to implement low traffic neighbourhoods in residential areas across the Old Connaught area.</i>	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective TM28	Applicant's Response
<i>It is an Objective to seek to provide homes zones in residential areas across the Old Connaught area.</i>	The proposed scheme includes multiple access points into a series of looped homezones on the western side of the primary north-south street, serving the Central Character Area Lands - Central. This approach treats the north-south street as an urban street, rather than as a local distributor road. The use of looped homezones avoids long, meandering streets and turning heads within the residential area, and is in compliance with DMURS
Objective TM29	Applicant's Response
<i>It is an Objective to support the Safe Routes to School initiative and deliver walking and cycling infrastructure on key access routes from residential areas to schools and to provide 'front of school' treatments which will enhance access to school grounds.</i>	The primary east-west street will link the residential area with Ferndale Road. The scheme proposes a 3m, 2 way cycle track on the northern side of this road in order to link the cycle track with the proposed Active Park & School lands to the north.
Objective TM30	Applicant's Response
<i>It is an Objective that car parking within the Plan area is controlled so as to determine car use and promote sustainable travel modes. The maximum car parking standards set out in Table 6.1 shall apply across all new residential development within the Plan area, where such provision is justified to the satisfaction of the Planning Authority.</i>	The proposed scheme includes total 289no. car parking spaces, allocated as residential, visitor, Go-Car or ESB spaces. Refer to the Car Parking Plan drawing and Schedule of Accommodation, prepared by O'Mahony Pike Architects.
Objective TM31	Applicant's Response
<i>It is an Objective that non-residential car parking will be assessed in accordance with Section 12.4.5 Car Parking Standards of the dlr County Development Plan 2022-2028 and will take an area-based parking approach parking that will: advantage to sustainable modes of transport, and to reprioritise the use of, and enhance, public space, while still maintaining limited access where some types of vehicles or owner-type are allowed. Transport and Movement It is an Objective to support the provision of publicly accessible charge points and infrastructure across the Plan area in accordance with the development management standards set out in Section 12.4.11 of the dlr County Development Plan 2022-2028.</i> • Discourage the use of on-street parking for long-stay purposes such as commuter parking. • Support a hierarchy of car parking need in	Creche parking is the only non-residential use. Visitor parking is provided along both N-S and E-W link streets within close proximity. Given the proposed residential development, it is anticipated futures users of the creche will predominantly arrive by foot and public transport to the creche. The creche includes 8 internal cycle spaces which complement and promote more sustainable movement patterns.

<i>mixed-use areas, prioritising the needs of people with disabilities, Age Friendly users, parent & child and short-stay shopping.</i> • <i>Ensure that the design and layout of parking facilities does not impede pedestrian and cycle desire lines to entrances to shops and local services.</i> • <i>Reduce the visual impact of surface car parking through the development management process.</i> • <i>Require the implementation of Green Infrastructure measures such as landscaping and grasscrete to reduce surface water run-off.</i> • <i>Require minimum levels of visitor cycle parking levels and quality design in accordance with dlr's cycle parking design standards.</i>	
Objective TM32	Applicant's Response
<i>It is an Objective to ensure adequate provision of both disabled and age friendly car parking spaces at appropriate locations across the Plan area.</i>	Disabled spaces are dispersed across the site at a rate of 4%. Refer to the Schedule of Accommodation , prepared by O'Mahony Pike Architects.
Objective TM33	Applicant's Response
<i>It is an Objective to promote car clubs and car sharing schemes to aim to reduce the need for individual car ownership and encourage more sustainable travel.</i>	2no. go-car parking spaces proposed. Refer to the Car Parking Plan , prepared by O'Mahony Pike Architects.
Objective TM34	Applicant's Response
<i>It is an Objective to consider residential schemes, on a case by case basis, which seek to implement the principles of remote parking and vehicular restriction areas in an integrated manner.</i>	Refer to the Car Parking Plan , prepared by O'Mahony Pike Architects.
Objective TM36	Applicant's Response
<i>It is an Objective to support the provision of publicly accessible charge points and infrastructure across the Plan area in accordance with the development management standards set out in Section 12.4.11 of the dlr County Development Plan 2022-2028.</i>	20% of all residential and visitor car parking spaces are equipped with an Electric Vehicle charging point. We refer to Dwg No. 24004-OMP-00-SP-DR-A-1200 entitled Car Parking Plan , prepared by O'Mahony Pike Architects.
Objective TM38	Applicant's Response
<i>It is an Objective to require a high standard of urban design and placemaking in the planning and design of all active travel schemes.</i>	We refer to the Traffic and Transport Assessment Report prepared by AtkinsRéalis Consulting Engineers .
Objective OCLAP36	Applicant's Response
<i>It is Policy, where practicable and possible, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the creation, management, restoration and enhancement of our natural and semi natural areas.</i>	The proposal contains two primary public open spaces, one to southeastern side and one to the northwestern side. The eastern public open space retains existing trees, and the western space facilitates an active travel route and visual connectivity between the wider scheme and the future Luas, promoting both active travel and public transport. Refer to Landscape Masterplan , prepared by Brady Shipman Martin Built Environment Consultants and Architectural Design Statement, prepared by O'Mahony Pike Architects.
Objective GIB2	Applicant's Response

<i>It is an Objective that development within the Plan area has regard to the Old Connaught Historic Landscape Character Assessment (2007).</i>	We refer to the LVIA and Photomontages prepared by Model Works for further details
Objective OCLAP37	Applicant's Response
<i>It is Policy to ensure the preservation of the views and prospects at Old Connaught, as designated in the dlr County Development Plan 2022-2028.</i>	We refer to the LVIA and Photomontages prepared by Model Works for further details
Objective GIB3	Applicant's Response
<i>It is an Objective that views and prospects within landholdings are further assessed as part of the development management process for planning applications in the Plan area. Where possible, the Planning Authority will seek to integrate the viewing potential of existing views and/or prospects.</i>	We refer to the LVIA and Photomontages prepared by Model Works for further and the Statement on Landscape, Biodiversity and Visual , prepared by Brady Shipman Martin Built Environment Consultants.
Objective OCLAP40	Applicant's Response
<i>It is Policy to ensure adequate ecological surveys, and, where necessary, ecological impact assessments, are undertaken at project level to inform development decisions, in accordance with the requirements of the dlr County Development Plan 2022-2028.</i>	We refer the Planning Authority to the Appropriate Assessment Screening Report (AASR) and Ecological Impact Assessment Report (EclA) prepared by Brady Shipman Martin Built Environment Consultants. A suite of biodiversity surveys including detailed botanical, bird, bat and large mammal surveys have been undertaken in accordance with Objective OCLAP40, to support this LRD application.
Objective GIB6	Applicant's Response
<i>It is an Objective that the design of lighting within the Plan area should seek to minimise light pollution and adverse effects on bat species, badgers and otters.</i>	We refer to the Outdoor Public Lighting report and layout plan prepared by Sabre Electrical Services Ltd
Objective OCLAP41	Applicant's Response
<i>It is Policy to require that the approach to existing and proposed trees throughout the Plan area is consistent with the dlr Tree Strategy 'A Climate for Trees 2024-2030', to ensure that the tree cover is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an 'urban forest', and holistic 'urban forestry' approach.</i>	We refer to the Arboricultural Assessment Report and Tree survey drawings, prepared by The Tree File Ltd.
Objective GIB7	Applicant's Response
<i>It is an Objective to protect and maintain important trees and hedgerows within the Plan area, where practicable, and to promote native tree/hedgerow enhancement and planting. The retention and protection of existing trees / woodlands / hedgerows shall accord with the requirements of the dlr County Development Plan 2022-2028.</i>	We refer to the Arboricultural Assessment Report and drawings , prepared by The Tree File Ltd.
Objective GIB8	Applicant's Response
<i>It is an Objective to promote and encourage planting of native tree and hedgerow species and to provide sufficient buffer to allow for wildlife corridors in new developments across the Plan area.</i>	We refer to the Landscape Masterplan , prepared by Brady Shipman Martin Built Environment Consultants.

Objective GIB9	Applicant's Response
<i>It is an Objective to:</i> • <i>Require that where the boundaries of sites incorporate or are adjacent to existing trees and hedgerows to be retained, these shall be utilised as part of the boundary.</i> • <i>Encourage the retention of hedgerows and other distinctive boundary treatments to prevent loss and fragmentation, where practically possible.</i>	We refer to the Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants. We refer also to the Arboricultural Assessment Report and drawings, prepared by The Tree File Ltd.
Objective GIB12	Applicant's Response
<i>It is an Objective to support and promote tree planting and urban greening as part of the public realm at Old Connaught.</i>	We refer to the Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants.
Objective GIB15	Applicant's Response
<i>It is an Objective that proposals for development demonstrate at pre-planning and application stage how biodiversity has informed scheme layout and design. Applicants are encouraged, where appropriate, to pilot the Biodiversity Net Gain Approach (BNG) for development.</i>	Refer to the Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants.
Objective OCLAP42	Applicant's Response
<i>It is Policy to ensure biodiversity is factored into nature based solutions when developing proposals within the Plan area.</i>	Refer to the Engineering Planning Report, prepared by AtkinsRéalis Consulting Engineering. We refer to the Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants
Objective OCLAP43	Applicant's Response
<i>It is Policy to ensure that the design of swales and stormwater attenuation areas and SuDS proposals include commitments to addressing a net gain in biodiversity. Where planting is required, native species must be used, including trees where suitable, with advice and input of a wetland ecologist.</i>	The proposal utilises SUDS based solutions for urban drainage, including tree pits and green roofs. The scheme also proposes elements of what will form the regional attenuation pond in the north-east corner of the site. Refer to the Engineering Planning Report, prepared by AtkinsRéalis Consulting Engineering and to the Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants
Objective GIB17	Applicant's Response
<i>It is an Objective to require that attenuation ponds are designed as naturalistic open features (e.g. ponds, wetlands) of value to wildlife and local amenity, with advice and input of a wetland ecologist. Their water quality and storage objectives shall be dealt with in combination with landscape integration, visual amenity and protection/enhancement of biological diversity.</i>	The scheme proposes elements of the regional attenuation pond for the first phase in the north-east corner of the site. Refer to the Engineering Planning Report, prepared by AtkinsRéalis Consulting Engineering and to the Landscape Masterplan and the Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants
Objective OCLAP45	Applicant's Response
<i>It is Policy that a minimum of 10% of total net residential site area shall comprise public open space in new residential developments. Public open space provision for residential schemes will be based on net residential area as defined in Appendix B of the Section Guidelines 'Sustainable and Compact Settlements' (2024).</i>	12.7% high quality public open space is provided on site (4519sq/m on an overall site area of 35579sq/m) The northwestern POS features play facilities.
Objective OPR2	Applicant's Response

<i>It is an Objective that all proposals for open space promote active travel and demonstrate connectivity and permeability with the wider network of sustainable movement routes across the Plan area.</i>	The public open space is located towards the northern and southern ends of the proposed development. These facilitate connections to the active travel route, and visual connectivity between the residential area and the public transport route along the main north-south street.
Objective OCLAP50	Applicant's Response
<i>It is Policy to ensure the protection of the historical character of Old Connaught and ensure that future development / redevelopment is carried out in a manner sympathetic to its special character, thus ensuring that the distinct character and intrinsic heritage qualities of the Old Connaught area are recognised.</i>	Refer to the Archaeological, Architectural and Cultural Heritage Technical Note , prepared by the Irish Archaeological Consultancy Ltd.
Objective OCLAP51	Applicant's Response
<i>It is Policy to encourage an interesting and eclectic mix of the old and the new, to strengthen the sense of place, character and identity of the Old Connaught area.</i>	The Oak veteran tree will be retained within the northwestern POS. Existing trees and hedgerow along the southern boundary of the southeastern POS are also integrated as far as possible. The removal of trees along existing tree lines has been carefully considered to retain higher quality trees within the proposed scheme. We refer to the Landscape Masterplan, prepared by Brady Shipman Martin Built Environment Consultants and to the Arboricultural Assessment Report and drawings, prepared by The Tree File Ltd.
Objective OCLAP52	Applicant's Response
<i>It is Policy to support appropriate development of high quality both in terms of design and materials which enhances the visual richness and character of the area.</i>	Refer to the Architectural Design Statement and the elevation drawings , prepared by O'Mahony Pike Architects.
Objective OCLAP57	Applicant's Response
It is Policy to: • To promote the use and appropriate maintenance of Sustainable Urban Drainage Systems (SuDS) and in particular nature-based solutions, to manage surface and groundwater regimes sustainably. These should be applied to all developments, including new road and public spaces, in line with Appendix 7 (7.1 and 7.2) of the dlr County Development Plan 2022-2028, to suit individual site layouts and local ground conditions. • Design and maintenance of SuDS Systems should be in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS) and the CIRIA SUDS Manual. The proposed networks should be designed in accordance with Appendix 7 (7.1 and 7.2) of the dlr County Development Plan 2022-2028, CIRIA C753 'The SuDS Manual', the Greater Dublin Strategic Drainage Systems (GSDSDS) and other relevant guidance documents. • The primary regional pond to serve the Old Connaught area shall be provided at lands identified in Figure 10.4. An additional, secondary and smaller attenuation pond should be provided at lands also identified in	The proposal utilises SUDS based solutions for urban drainage, including tree pits and green roofs atop of apartment blocks. Refer to the Storm Water Impact Assessment Report and associated drawings, prepared by AtkinsRéalis Consulting Engineering.

<i>Figure 10.4. These ponds will provide storage to meet attenuation requirements for the 1% AED and provide the final stage of treatment for water runoff prior to discharge to the public network/stream outside of the Old Connaught LAP area. The ponds may provide amenity and biodiversity benefits in accordance with best design practice.</i> <i>• To pilot and test new green infrastructure installations in the public realm to boost biodiversity and improve surface water management, including the use of permeable materials for surfaces, green roofs and the provision of storm water tree trenches / pit.</i> <i>• To support the development of soft landscaping in public open spaces and parks, where feasible in accordance with the principles of Sustainable Drainage Systems (SuDS).</i>	
Objective OCLAP58	Applicant's Response
<i>It is Policy to:</i> <i>• Ensure the protection of groundwater resources and associated habitats and species in accordance with the EU Groundwater Directive. All new planning applications within the LAP area shall have regard to the likely impacts the proposed development may have on groundwater resources.</i> <i>• Ensure that planning applications take into account any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.</i>	There are no groundwater-dependent ecosystems of any kind on the subject site and no pathways or links of any kind to groundwater-dependent habitats associated with any European site. Refer to the Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Built Environment Consultants.
Objective OCLAP59	Applicant's Response
<i>It is Policy to ensure the implementation of the surface water legislation 'Environmental Objectives (Surface Waters) Regulations 2009' to ensure that development permitted will not have an unacceptable impact on water quality including surface waters, ground water, river corridors, estuarine waters, bathing waters, coastal and transitional waters. Development within the Plan area shall comply with the Policies and Objectives of the dlr County Development Plan relating to protection of existing water and drainage infrastructure.</i>	Refer to the Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Built Environment Consultants.
Objective OCLAP60	Applicant's Response
<i>It is Policy to manage flood risk in the Old Connaught LAP area in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014) and to require all proposed developments to carry out a Site-Specific Flood Risk Assessment that shall demonstrate compliance with:</i> <i>• The Planning System and Flood Risk Management, Guidelines for Planning</i>	Refer to the Storm Water Impact Assessment Report and Flood Risk Assessment, prepared by AtkinsRéalis Consulting Engineering.

Authorities (DEHLG/OPW, 2009), as may be revised and/or updated. • The prevailing Dún Laoghaire-Rathdown County Development Plan. • Given that a Plan-Making Justification Test was carried out in SFRA at County Development Plan-level, any SSFRA produced will not be required to carry out this exercise. • The SSFRA shall pay particular emphasis to site specific mitigation measures and any necessary management measures, as per Appendix B4 of the above 2009 National Guidelines.	
Objective OCLAP63	Applicant's Response
It is Policy to: • Encourage and support the development of solar energy infrastructure, including photo voltaic (PV) in appropriate locations where it is demonstrated that such development will not introduce significant adverse environmental effects. Encourage and support wind and battery energy storage systems. • Support the development of district heat networks and the utilisation of waste heat recovery having due regard to potential environmental impacts typically associated with district heating development.	We refer to the Energy & Sustainability Statement, prepared by Delap & Waller, which confirms a feasibility study was carried out to determine the most feasible and effective low zero carbon and renewable energy technologies for use within the development. The analysis and proposed strategy uses highly efficient Air Source Heat Pumps (ASHPs) to deliver space heating and domestic hot water.
Objective OCLAP64	Applicant's Response
It is Policy to promote and facilitate the provision of an appropriate telecommunications infrastructure at Old Connaught, including broadband, fibre optic connectivity and other technologies.	We refer to the Telecommunication Report, prepared by Delap and Waller for further details.
Objective OCLAP66	Applicant's Response
It is Policy that: • Future development, as appropriate, shall accord with the Phasing Strategy for the Plan. Planning applications shall include a 'Consistency Statement' setting out how the objectives of the Phasing Strategy, as relevant and applicable to the proposal for development, will be achieved. • Deviations from the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Plan. Any interim proposals must ensure and maintain consistency with the build-out or 'long-term' infrastructure objectives of the Plan.	A phasing strategy contains two phases, phase one which delivers the main north-south link road and creche. Phase two features the build out of the southern half of the proposed development. We refer the Planning Authority to the Phasing Plan prepared by OMP entitled '24004-OPM-00-SP-DR-A-1300'

10 SCREENING FOR APPROPRIATE ASSESSMENT

We refer the Planning Authority to the Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Landscape and Built Environment Consultants. The Report generally concludes that: -

“In view of best scientific knowledge this report concludes that the proposed development at Old Connaught (Phase 1) individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that this report provides sufficient relevant information to allow the Competent Authority (Dún Laoghaire-Rathdown County Council) to carry out an Appropriate Assessment Screening under section 177U of the Planning Acts and reach a determination that the proposed development will not have any likely significant effects on European sites in light of their conservation objectives.”

We refer the Planning Authority to the Ecological Impact Assessment Report (EclA), prepared by Brady Shipman Martin Landscape and Built Environment Consultants. The Report generally concludes that: -

“The proposed development responds comprehensively to the requirements identified in the Biodiversity Officer’s Opinion. The landscape design integrates biodiversity value throughout the site through native planting, habitat connectivity, and nature-based solutions, while maintaining compliance with Old Connaught LAP requirements for density and infrastructure. Comprehensive baseline surveys and specialist expertise inform all mitigation recommendations, and systematic monitoring will demonstrate the ecological benefits of the proposed development in the medium to long term.

The development will result in significant ecological enhancement compared to the current agricultural baseline, with habitat value increasing as the proposed native planting becomes established.”

11 ENVIRONMENTAL IMPACT ASSESSMENT REPORT

An Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates accompanies this application. The Report confirms the following: -

“having regard to (a) the nature and scale of the proposed development, on zoned lands served by public infrastructure, (b) the absence of any significant environmental sensitivities in the area, (c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended), and to the limited nature and extent of the proposed development is not considered likely to result in any long-term significant impacts on its surrounding environment.

The need for Environmental Impact Assessment can, in our professional opinion, be excluded given the development site is less than 10HA in size and significantly below 500 dwellings. We refer the planning authority to the EIAR screening report for further information.

We recognise that the Planning Authority is the competent authority to determine the matter.

12 CONCLUSION

It is our considered professional planning opinion that the proposed LRD development complies with the proper planning and development of the area, when assessed against the relevant strategic and local planning policy context, as primarily expressed in: -

- Climate Action Plan 2025
- National Sustainable Mobility Policy

- Delivering Homes, Building Communities 2025-
- First Revision to the National Planning Framework, Ireland 2040 (April 2025)
- Eastern & Midlands Regional Spatial & Economic Strategy and Dublin Metropolitan Area Spatial Plan 2019-2031
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)
- Quality Housing for Sustainable Communities (2007)
- Design Standards for apartments Guidelines for Planning Authorities (2025)
- Urban Development and Building Height Guidelines (2018)
- Dun Laoghaire Rathdown Development Plan 2022-2028 (including Variation No. 1)
- Old Connaught Local Area Plan (2025)
- The Planning System and Flood Risk Management (2009)
- Design Manual for Urban Roads & Spaces (2019)
- Childcare Facilities, Guidelines for Planning Authorities (2001)

The proposed development was subject to LRD stage 1 and 2 pre-planning consultation with the Council. It is supported with the information identified by the planning authority, to ensure its accordance with the proper planning and sustainable development of the area.

We would respectfully submit and conclude that the proposed LRD scheme is: -

- Generally consistent with the planning policies and objectives of the statutory County Development Plan and Old Connaught LAP, and with the other relevant national and regional planning strategies and guidelines.
- In accordance with the area specific design and phasing provisions of the Old Connaught LAP, including the delivery of a creche, connecting transport and active travel infrastructure and strategic water and drainage infrastructure.
- Represents a well-designed and thought out development, which achieves sustainable residential density, integrated with public amenity open space and the existing landscape, having regard to the Council's settlement and housing strategy for the County, in an accessible outer suburban location.
- Building heights comply with the county strategy and Building Heights (2018) guidelines and the LAP heights strategy.
- The proposed houses provide for a range of unit sizes in heights of 2 and 3 stories, avoiding monoculture of units.
- The design of duplexes and apartments within the scheme meet the sustainable development standards set out in the 2025 Apartment Guidelines which the County Development Plan will accord with, following the expected adoption of Variation No.1 to the Development Plan. The parallel assessment of the published draft National Planning Statement on Planning Design Standards for Apartments (2026) is set out in the Statement of Consistency. This assessment is provisional pending issue of the final National Planning Statement.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

13 ENCLOSURES

The following are enclosed with this request for Pre-Planning Consultation: -

- 1 Cover Letter, prepared by Stephen Little & Associates.
- 2 LRD Planning Application Form 19.
- 3 Proof of Payment.
- 4 Newspaper Notice.
- 5 Site Notice.
- 6 Applicant Consent to Agent Letter.
- 7 Dun Laoghaire Rathdown County Council Letter of Consent.
- 8 Confirmation of Feasibility from Uisce Eireann dated 18 February 2026 (Appendix B of the Engineering Planning Report)
- 9 Statement of Design Acceptance from Uisce Eireann dated 21 July 2026 (Appendix E of the Engineering Planning Report)
- 10 Part V Costings Letter.
- 11 Part V Validation Letter.
- 12 Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates.
- 13 Planning Application Report and Statement of Consistency prepared by Stephen Little & Associates.
- 14 LRD Opinion Response prepared by Stephen Little & Associates.
- 15 Architectural Drawings, prepared by O'Mahony Pike Architects (refer to enclosed drawing schedule).
- 16 Architectural Design Statement, prepared by O'Mahony Pike Architects.
- 17 Part V Proposal Booklet, prepared by O'Mahony Pike Architects.
- 18 Housing Quality Assessment, prepared by O'Mahony Pike Architects.
- 19 Schedule of Accommodation, prepared by O'Mahony Pike Architects.
- 20 Road and Transportation Drawings, prepared by AtkinsRéalis Consulting Engineers (refer to enclosed drawing schedule).
- 21 Storm Water Impact Assessment Report, prepared by AtkinsRéalis Consulting Engineers.
- 22 Flood Risk Assessment Stage 1 & 2, prepared by AtkinsRéalis Consulting Engineers.
- 23 Engineering Planning Report, prepared by AtkinsRéalis Consulting Engineers.
- 24 Response to Stage 2 LRD Opinion Report (Transport), prepared by AtkinsRéalis Consulting Engineers.
- 25 Traffic and Transport Report, prepared by AtkinsRéalis Consulting Engineers.
- 26 Quality Audit, prepared by AtkinsRéalis Consulting Engineers.
- 27 Road Safety Audit Stage 1, prepared by AtkinsRéalis Consulting Engineers.
- 28 Mobility Management Plan, prepared by AtkinsRéalis Consulting Engineers.
- 29 Outline Construction Traffic Management Plan, prepared by AtkinsRéalis Consulting Engineers.
- 30 DMURS Statement, prepared by AtkinsRéalis Consulting Engineers.
- 31 Foul Pump Station and Rising Main Report, prepared by AtkinsRéalis Consulting Engineers.
- 32 Construction Environmental Management Plan, prepared by AWN Consulting.
- 33 Resource Waste Management Plan, prepared by AWN Consulting.

- 34 Operational Waste Management Plan, prepared by AWN Consulting.
- 35 Wind Microclimate Study, prepared by Integrated Environmental Solutions Limited.
- 36 Environmental Noise and Vibration Impact Assessment, prepared by Traynor Environmental Ltd.
- 37 Landscape Drawings, prepared by Brady Shipman Martin Built Environment Consultants (refer to enclosed drawing schedule).
- 38 Landscape Design Statement, prepared by Brady Shipman Martin Built Environment Consultants.
- 39 Outdoor Lighting Report, prepared by Sabre Electrical Services Ltd
- 40 SES 06526 Sheet 1 Public Lighting Layout, prepared by Sabre Electrical Services Ltd
- 41 SES 06526 Sheet 2 Public Lighting Layout, prepared by Sabre Electrical Services Ltd
- 42 Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Built Environment Consultants.
- 43 Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants.
- 44 Archaeological and Architectural Assessment, prepared by Irish Archaeological Consultancy.
- 45 Daylight, Sunlight and Overshadowing Assessment Report, prepared by Model Works.
- 46 Landscape and Visual Impact Assessment, prepared by Model Works.
- 47 Verified Photomontages, prepared by Model Works.
- 48 CGIs, prepared by Model Works.
- 49 Arboricultural Report, prepared by The Tree File Ltd.
- 50 Arboricultural Drawings, prepared by The Tree File Ltd (refer to enclosed drawing schedule).
- 51 Energy & Sustainability Statement, prepared by Delap & Waller.
- 52 Telecommunication Report prepared by Delap and Waller
- 53 Building Lifecycle Report, prepared by Castlethorn Old Conna ULC
- 54 Public Liaison Plan, prepared by Castlethorn Old Conna ULC.

14 APPENDIX A – STATEMENT OF CONSISTENCY

National Policy Objective 9 Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.	Applicant's Response See comment above regarding Metropolitan Town categorisation and amendments to the wording of the LAP on this same topic. Status of lands in the context of 'Dublin City & Suburbs', Bray town, etc
National Policy Objective 10 Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.	Applicant's Response A LUAS reservation corridor has been provided in accordance with the Old Connaught Phase A-Infrastructure Phasing requirement. We additionally, note bus stops along the proposed North South link road. The lands are within walking distance of existing and planned public transport in the form of bus services and proposed Green Line Luas Extension corridor at Old Connaught. The proposed development benefits from established public transport connections along Dublin Road (R118), which is served by frequent Dublin Bus and BusConnects services providing direct links to Bray Town Centre, Cherrywood, Dún Laoghaire and Dublin City Centre. Consequently, the lands are well positioned to benefit from both existing public transport services and the planned Green Line Luas Extension at Old Connaught.
Chapter 4: Making Stronger Urban Places	
National Policy Objective 12 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.	Applicant's Response The proposed development has a connected and walkable layout, which ensures connectivity to the active travel route. Following pre-planning discussions with the Planning Authority, further permeability connections have been provided for including lands to the south and to the west. The proposed scheme establishes pedestrian, cycle & vehicular connectivity with Old Connaught Avenue which will support and facilitate proposed and future development in the wider environs. Active travel routes are provided from east to west across the subject site, connecting with future phases of development. Reference should be made to the Architectural Design Statement prepared by OMP Architects, the Landscape Design Statement prepared by Brady Martin Shipman Built Environment Consultants and Traffic and Transport Assessment prepared by AtkinsRéalis Consulting Engineers for further details on how the design promotes the creation of attractive, liveable, and well-designed urban spaces. These statements outline how the development will deliver a high-quality environment that supports diverse, integrated communities and enhances overall quality of life and well-being
National Policy Objective 14 Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support	Applicant's Response The proposed development will provide a new community between Shankill and Bray and complement the existing village which in turn will support existing settlements whilst providing new amenities. Whilst this application is not located within

their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.	the 'Village Core' Character Area, it will ensure a sufficient population is located within easy walking and cycling distance to support future commercial and communities facilities and in turn reducing car dependency.
National Policy Objective 17 In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to: Agreement (regional assembly, metropolitan area and/or local authority as appropriate); Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.	Applicant's Response The proposed development forms part of the Bray metropolitan town and is fully aligned with the recently adopted Old Connaught LAP which is plan led to facilitate sustainable development.
National Policy Objective 20 In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.	Applicant's Response The proposed development is located on greenfield lands within walking distance of existing and planned public transport in the form of bus services at Old Connaught. The range of dwelling types and sizes proposed will facilitate a mix of tenure to support emerging housing need in this location. The increase in housing stock will support existing businesses as well as future commercial uses within the adjacent Village Core character area.
National Policy Objective 22 In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.	Applicant's Response The proposal has been designed in line with the LAP Height strategy. Please see the Opinion Response Report prepared by Stephen Little & Associates.
Chapter 6: People, Homes and Communities	
National Policy Objective 37 Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.	Applicant's Response The proposed scheme establishes pedestrian, cycle & vehicular connectivity with Old Connaught Avenue. Active travel routes are provided from east to west as well as north-south across the subject site, connecting with future phases of development.
National Policy Objective 41 Prioritise the alignment of targeted and planned population and employment growth with investment in: • A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities; • The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development,	Applicant's Response The proposal includes a creche which is located in the ground floor of Block C. It has a capacity of 90no. childcare spaces, over the capacity demand of 43no. spaces for the proposed development. It will, nevertheless, be delivered in phase 1 of the development, thus ensuring the provision and timely delivery of childcare facilitates for new populations.

thereby contributing to the development of sustainable communities; • The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and • Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.	
National Policy Objective 42 To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040	Applicant's Response The proposal will provide 271 new housing units including up to 55 Part V social houses.
National Policy Objective 43 Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.	Applicant's Response The proposed development is located on greenfield lands within easy walking distance of existing and planned public transport in the form of bus services at Old Connaught. Bus stops along the North-South link road will add new bus stops serving the immediate area. A LUAS reservation corridor will future proof the area for potential tram services in the future.
National Policy Objective 44 Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	Applicant's Response 12.5% of the proposed apartment units are designed to Universal Design standards, as well as a range of unit sizes from 1 bed to 4 beds to suit many different residents. Additional information on Universal Design can be found in the Architectural Design Statement, prepared by O'Mahony Pike Architects.
National Policy Objective 45 Increase residential density in settlements, through a range of measure including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increase building heights and more compact forms of development.	Applicant's Response The proposed development provides a range of building heights from 2 to 5 storey, reflecting the Old Connaught LAP Building Strategy. Taller 4-5 storey Apartment Block 3, is located at key gateway and landmark location within the Central Character Area, while 2 to 3 storey houses and duplexes provide an appropriate transition to the surrounding residential areas.
Chapter 9: Realising Our Sustainable Future	
National Policy Objective 77 Enhance water quality and resource management by: • Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities; • Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, to create safe places.	Applicant's Response A Flood Risk Assessment Stage 1 and 2, prepared by AtkinsRéalis Consulting Engineers concludes: - <i>"The majority of the site is located within Flood Zone C, with only limited encroachment of Flood Zones A and B into peripheral areas of the development lands. Application of the Sequential Approach has informed the site layout and all residential dwellings, apartment buildings and other highly vulnerable development have been located within Flood Zone C. Limited infrastructure elements including sections of road and buried utilities occur within Flood Zones A and B; however, these elements will not impede flood flows or increase flood risk elsewhere. The development incorporates surface water management measures, exceedance flow routing, climate change allowances and finish floor levels outside the extents of flood zones. The proposed development can therefore be developed safely without giving rise to unacceptable flood risk to people, property or the surrounding environment."</i>

	<i>The Stage 2 Initial Flood Risk Assessment has demonstrated that the proposed development is compatible with the identified flood risk constraints and that vulnerable development has been directed towards Flood Zone C in accordance with the Planning System and Flood Risk Management Guidelines. No further flood risk assessment is considered necessary to support this planning application."</i>
National Policy Objective 79 Support the management of stormwater, rainwater and surface water flood and pollution risk through the use of nature-based solutions and sustainable drainage systems, including the retrofitting of existing environments to support nature-based solutions	Applicant's Response The proposed development incorporates a comprehensive SuDS strategy, including swales, permeable paving, green roofs, filter drains, tree pits and attenuation measures. Refer to the Storm Water Impact Assessment, prepared by AtkinsRéalis.
National Policy Objective 83 Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas.	Applicant's Response The proposal contains two public open spaces, one to eastern side and one to the western side. The eastern public open space retains existing trees, and the western space facilitates the north-south greenway spine identified in the Old Connaught LAP, providing an active travel route and visual connectivity between the wider scheme. A future LUAS reservation corridor will compliment both active travel and public transport of which this scheme will deliver.
National Policy Objective 89 Protect, conserve and enhance the rich qualities of natural, cultural and built heritage in a manner appropriate to their cultural and environment significance.	Applicant's Response Refer to the Archaeological and Architectural Assessment, prepared by Irish Archaeological Consultancy Ltd.
National Policy Objective 93 Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.	Applicant's Response The area will be a low speed (30km/h) low traffic area which will in turn reduce future residents' exposure to emissions and poor air quality. Car parking provides for over 20% EV charging, with the ability to install EV chargers at a later date for the balance of spaces, again improving local air quality.
National Policy Objective 94 Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through Strategic Noise Maps, Noise Action Plans and national planning guidance.	Applicant's Response An Environmental Noise and Vibration Impact Assessment has been prepared by Traynor Environmental Ltd and undertaken in accordance with relevant national guidance. The assessment confirms that, subject to the implementation of mitigation measures, the proposed development will provide an acceptable acoustic environment, with no significant adverse noise or vibration impacts.

Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019 – 2031



The Eastern and Midlands Regional Spatial and Economic Strategy (RSES) came into effect on 28 June 2019. The RSES includes the Dublin Metropolitan Area Strategic Plan (DMASP), which covers Dublin City and Metropolitan Area including DLR County Council.

This document sets out the regional level strategic planning policy for the eastern and midland region, and Dublin Metropolitan Area, in line with the national strategy and policy objectives for managing housing and employment development to support projected population growth set out in the NPF.

Chapter 4 – People and Place

Regional Policy Objective 4.26

Core strategies in local authority development plans shall support objectives to achieve a minimum of 30% of housing in Key Towns by way of compact growth through the identification of key sites for regeneration.

Applicant's Response

These lands are identified plan-led residential development under the Old Connaught LAP. The RSES states that "Population growth in Bray has been modest compared to other settlements as expansion of the town is constrained by the coast to the east, Bray head/Sugarloaf mountains to the south and the N/M11 to the east. In order for Bray to fulfil its growth potential, lands at Fassaroe to the west of the N/M11 are targeted for new housing, employment and major community and sports facilities, along with development of lands at Old Connaught (Conna)-Fassaroe, which are within Dún Laoghaire-Rathdown.

Regional Policy Objective 4.37

Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, Dún Laoghaire-Rathdown County Council, and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links and road improvements.

Applicant's Response

The proposed development supports the planned westward expansion of Bray. The development incorporates key transport infrastructure including the Luas Reservation Corridor – safeguarding long-term public transport infrastructure in accordance with the LAP objectives and active travel, contributing to the coordinated growth of Bray.

Regional Policy Objective 4.40

To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray. The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services.

Applicant's Response

The proposed development supports the planned Luas extension to Bray through the provision of a safeguarded Luas reservation corridor and delivers strategic road and active travel infrastructure in accordance with the Old Connaught LAP, facilitating the coordinated delivery of a sustainable transport infrastructure.

Regional Policy Objective 4.41

RPO 4.41: Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance.

Applicant's Response

A range of low carbon transport initiatives has been provided for, including active travel, bus and LUAS accessibility, facilitating sustainable travel options in years to come.

Chapter 5 – Dublin Metropolitan Area Strategic Plan (MASP)

Regional Policy Objective 5.3

Future development in the Dublin Metropolitan area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on

Applicant's Response

Whilst the area is not within 'Dublin City & Suburbs', the wider Dublin Metropolitan Area (DMA) metropolitan area, covers the continuous built-up city area and includes the

increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.	highly urbanised settlements including Bray. An array of cycle and pedestrian infrastructure will be delivered. The proposed development is located on greenfield lands within walking distance of public transport in the form of bus services at Old Connaught.
Chapter 7 – Environment and Climate	
Regional Policy Objective 7.15 Local authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.	Applicant's Response The proposed development has been designed to protect and enhance biodiversity through the retention of existing mature trees, including along the tree-lined Old Connaught Avenue, and the integration of high-quality public open spaces. Existing ecological features, including the badger sett located to the south within Dún Laoghaire-Rathdown lands are protected through appropriate mitigation measures. Refer to the Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants.
Regional Policy Objective 7.41 Support and promote structural materials in the construction industry that have low to zero embodied energy & CO ₂ emissions.	Applicant's Response Refer to the Energy & Sustainability Statement, prepared by Delap & Waller Ltd.
Regional Policy Objective 7.42 Local authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging facilities and prioritisation of parking for EVs in central locations.	Applicant's Response The proposed development supports increased electric vehicle use through the provision of 58no. EV parking spaces, while prioritizing sustainable transport and reducing reliance on private car use.
Chapter 8 – Connectivity	
Regional Policy Objective 8.3 That future development is planned and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned and to protect and maintain regional accessibility.	Applicant's Response The proposed development is located on greenfield lands within walking distance of existing and planned public transport in the form of bus services at Old Connaught.
Regional Policy Objective 8.7 To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.	Applicant's Response Refer to the Mobility Management Plan, prepared by AtkinsRéalis Consulting Engineers.
Chapter 9 – Quality of Life	
Regional Policy Objective 9.10 In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.	Applicant's Response The proposed development promotes healthy placemaking through a permeable network of walking and cycling routes, high-quality public open spaces and strong public transport connectivity. The street layout has been designed in accordance with DMURS to prioritise active travel and reduce reliance on the private car.
Chapter 10 – Infrastructure	
Regional Policy Objective 10.15 Support the relevant local authorities (and Irish Water where relevant) in the Region to improve storm water	Applicant's Response The proposed development incorporates Sustainable Urban Drainage Systems, including attenuation and surface

infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions.

water management measures, to reduce flood risk, improve water quality and support sustainable stormwater management.

Climate Action Plan 2025



The Climate Action Plan 2025 sets out the roadmap to deliver on Ireland's climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. This will enable Ireland to meet 2030 targets and be well placed to meet mid-century decarbonisation objectives. This will also deliver cleaner air, warmer homes, a more secure energy system and a better quality of life for Irish citizens.

Built Environment

Key Target	Applicant's Response
All new dwellings designed and constructed to Nearly Zero Energy Building standard by 2025, and Zero Emission Building standard by 2030.	Refer to the Energy & Sustainability Statement, prepared by Delap & Waller Ltd.

Transport

Theme	Key Target	Applicant's Response
Reduction in Total Vehicle Kilometres	20% reduction in total vehicle kms. relative to 2030 Business As Usual scenario.	The proposed development is located on greenfield lands within walking distance of public transport in the form of bus services at Old Connaught. The proposed development provides secure bicycle parking facilities which will further support a shift toward active travel patterns. We refer the Planning Authority to the Transport and Traffic Assessment & Mobility Management Plan prepared by Realis Atkins for further details of the proposed development's measures to mitigate car dependency and promote active travel options.
Reduction in Fuel Usage	50% reduction in fuel usage.	
Increase in Sustainable Transport Trips	50% increase in daily active travel Journeys.	
	130% increase in daily public transport journeys.	
	25% reduction in daily car journeys.	
Shift in Daily Journeys Modal Share	Shift in Daily Mode Share.	
	2018: 72% (Car), 8% (Public Transport), 20% (Active Travel).	
	2030: 53% (Car), 19% (Public Transport), 28% (Active Travel).	
Fleet Electrification	Private Car Fleet Battery EV share of total passenger car fleet (30%) EV share of new registrations (100%) 845,000 Private EVs	The proposed development provide 20% EV car parking spaces for on-street car parking associated with the apartments.

Planning Design Standards for Apartments (2025)		To meet housing demand in Ireland, it is necessary to significantly increase supply. This is a key pillar of the overarching Housing for All Plan. The National Planning Framework targets increased housing supply in Ireland’s cities and urban areas in particular. For the reasons outlined earlier, increased housing supply must include a dramatic increase in the provision of apartment development.
Housing Mix		
Specific Planning Policy Requirement 1 – Unit Mix (A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms. (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.	Applicant’s Response The proposed scheme includes the following unit mix: - 1 Bed Apartment: 49 2 Bed Apartment: 113 3 Bed Duplex (5P): 6 2 Bed Houses: 10 3 Bed Houses: 71 4 Bed Houses: 22 The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location.	
Apartment Design Standards		
Specific Planning Policy Requirement 2– Floor Areas <i>Specific Planning Policy Requirement 2</i> requires that the following minimum floor areas are achieved for apartments: - Minimum Apartment Floor Areas:- <i>Studio Apartment (1 person) 32sqm</i> <i>1-bedroom apartment (2 persons) 45sqm</i> <i>2-bedroom apartment (3 persons) 63sqm</i> <i>2-bedroom apartment (4 persons) 73sqm</i> <i>3-bedroom apartment (4 persons) 76sqm</i> <i>3-bedroom apartment (5 persons) 90sqm</i> The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing. The SPRR also states “statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out”.	Applicant’s Response The proposed units meet or exceed the minimum floor area requirements, Setout in SPPR 2. We note the Design Standards for Apartments 2025 reduced the requirement for the majority of units to exceed the minimum sizes set out in SPPR2 by 10% to 25% of all units, in an effort to increase the economic viability of apartment schemes. In this context, 26.8% of the proposed units exceed the minimum floor area sizes Setout in SPPR 2 which comfortably above the 25% Standard. We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, and Design Statement prepared by OMP Architects for compliance in regard to SPPR 2 and further details.	

Specific Planning Policy Requirement 3– Dual Aspect Specific Planning Policy Requirement 3 states that “In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: - A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement. - For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”	Applicant’s Response All houses within the proposed scheme are dual aspect, and c. 44% of the proposed apartment units are dual aspect and therefore significantly above the required minimum standard of 25% as outline in SPPR 3. A small number of single aspect, north facing apartments are proposed in Block 3. These units are overlooking the Active Park, which is considered to be a significant amenity, and therefore a suitable aspect for single aspect, north facing units, which accords with the 2025 Apartment Guidelines. We refer the Planning Authority to the Schedule of Areas, prepared O’Mahony Pike Architects for further detail.
Specific Planning Policy Requirement 4 – Floor to Ceiling Heights Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.	Applicant’s Response All apartment and duplex units have a ground level floor to ceiling height of min. 2.7m. We refer the Planning Authority to the Apartment elevation and section drawings, prepared by O’Mahony Pike Architects for further detail.
Specific Planning Policy Requirement 5 – Lift and Stair Cores There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.	Applicant’s Response Not relevant to the proposed application.
Section 3.7 – Internal Storage Minimum requirements for storage areas are set out in Appendix 1: - - Studio apartment 3 sq. m 1-bedroom apartment 3 sq. m 2-bedroom apartment (3 persons) 5 sq. m 2-bedroom apartment (4 persons) 6 sq. m 3-bedroom apartment(4 Persons) 6 sq. m 3-bedroom apartment (5 persons) 9 sq. m Other considerations: - - No individual storage room within an apartment should exceed 3.5 sq. m. - Apartment schemes should provide storage for bulky items outside individual units (i.e. at ground or basement level). Where secure, allocated ground or basement level storage is provided, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these guidelines.	Applicant’s Response In the first instance, we refer to the Housing Quality Assessment and the Architectural Design Statement prepared by OMP Architects for further details in relation to compliance with section 3.7 – Internal storage. We note a bulky goods and Bicycle store in provided in a pavilion at ground floor level in Block 3. We note all Apartment types meet or exceed the minimum storage area requirements set out in the guidelines. We refer the Planning Authority to the House Type Drawings and Housing Quality Assessment, prepared by O’Mahony Pike Architects for further detail. No individual storage rooms are larger than 3.5 sq. m.

Section 3.8 – Private Amenity Space It is a policy requirement that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Minimum required areas for private amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment (4 Persons) 7sq.m • 3-bedroom apartment (5 persons) 9 sq. m A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the minimum floor area requirement under these guidelines.	Applicant's Response We refer the Planning Authority to the House Type Drawings and Schedule of Areas, prepared by O'Mahony Pike Architects for further detail. All duplex / apartments are provided with private patios / terraces.
Communal Facilities	
Section 4.2– Waste Management Provision shall be made for the storage and collection of waste materials in apartment schemes. Waste storage facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and ensure adequate containers can be provided for residual, recyclable and food waste, to comply with waste management legislation, at designated waste storage points.	Applicant's Response Dedicated bin stores are provided for the duplex / apartments. An Operational Waste Management Plan is enclosed with this application in this instance.
Section 4.3 – Communal Amenity Space Minimum required areas for public communal amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment (4 Persons) 7sq.m • 3-bedroom apartment (5 Persons) 9 sq. m For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, communal amenity space may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality	Applicant's Response Dedicated communal open spaces areas are provided for the duplex / apartments. We refer the Planning Authority to the Schedule of Areas, prepared by O'Mahony Pike Architects which demonstrates that the minimum areas are comfortably exceeded.
Section 4.4 – Children's Play Children's play needs around the apartment building should be catered for: • Within the private open space associated with individual apartments (see chapter 3); • Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and	Applicant's Response A creche is provided on the ground floor of Block 3, with an estimated capacity of c. 90 childcare places. A play area for the creche is provided at ground level with an external enclosed play area. In terms of children play landscaping drawing, prepared by Brady Shipman Martin Built Environment Consultants show playground equipment in the eastern and southern POS.

Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.	
Specific Planning Policy Requirement 6 – Communal, Community and Cultural Facilities Specific Planning Policy Requirement 6 states that: The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	Applicant's Response Not relevant in the proposed development.

Draft National Planning Statement on Planning Design Standards for Apartments (2026)

The June 2026 draft National Planning Statement (NPS) is assessed below alongside the current Design Standards for Apartments Guidelines for Planning Authorities (2025). The draft has not yet been issued and the 2025 Guidelines remain applicable at the date of this report. The assessment below addresses the published draft in case an NPS is issued before the planning decision. Its final text and commencement position should be checked before lodgement and again when the application is determined. National Planning Policies and Measures (NPPMs) are distinguished from the supporting National Planning Policy Guidance.

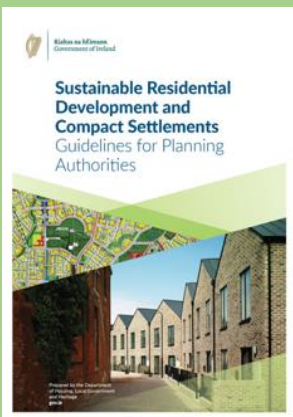
Draft Planning Design Standards for Apartments National Planning Statement (2026)		<i>This National Planning Statement sets out policy and guidance in relation to the planning and development of apartments in all housing or mixed-use developments that include apartments that may be made available for sale, whether for owner occupation or for individual lease, or for rental purposes.</i>
Apartment Mix		
National Planning Policy and Measure No. 1 – Apartment Mix With the exception of social housing developments, social/affordable housing provided for under Part V of the Act of 2000 or Part 7 of the Planning and Development Act 2024, or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.	Applicant’s Response The proposed scheme includes the following unit mix: - 1 Bed Apartment: 49 2 Bed Apartment: 113 3 Bed Duplex (5P): 6 2 Bed Houses: 10 3 Bed Houses: 71 4 Bed Houses: 22 The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location.	
Apartment Design Standards		
National Planning Policy and Measure No. 2– Apartment Floor Areas	Applicant’s Response The proposed units meet or exceed the minimum floor area requirements, Setout in SPPR 2. We note the Design Standards for Apartments 2025 reduced the requirement for the majority of units to exceed the minimum sizes set	

The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below: • Studio apartment (1 person) • 1-bedroom apartment (2 persons) 45 sq.m • 2 bedroom apartment (3 persons) 63 sq.m 32 sq.m • 2-bedroom apartment (4 persons) 73 sq.m • 3-bedroom apartment (4 persons) 76 sq. m • 3-bedroom apartment (5 persons) 90 sq.m The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.	out in SPPR2 by 10% to 25% of all units, in an effort to increase the economic viability of apartment schemes. In this context, 26.8% of the proposed units exceed the minimum floor area sizes Setout in SPPR 2 which comfortably above the 25% Standard. We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, and Design Statement prepared by OMP Architects for compliance in regard to SPPR 2 and further details.
National Planning Policy and Measure No. 3– Dual Aspect Ratios A minimum of 25% of units within a development are required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this National Planning Policy and Measure.	Applicant’s Response All houses within the proposed scheme are dual aspect, and c. 44% of the proposed apartment units are dual aspect and therefore significantly above the required minimum standard of 25% as outline in SPPR 3. A small number of single aspect, north facing apartments are proposed in Block 3. These units are overlooking the Active Park, which is considered to be a significant amenity, and therefore a suitable aspect for single aspect, north facing units, which accords with the 2025 Apartment Guidelines. We refer the Planning Authority to the Schedule of Areas, prepared O’Mahony Pike Architects for further detail.
National Planning Policy and Measure No. 4 – Floor to Ceiling Height A minimum ground level apartment floor to ceiling height of 2.7m shall apply and statutory plans shall not specify a minimum ground level apartment floor to ceiling height requirement that exceeds 2.7m.	Applicant’s Response All apartment and duplex units have a ground level floor to ceiling height of min. 2.7m. We refer the Planning Authority to the Apartment elevation and section drawings, prepared by O’Mahony Pike Architects for further detail.
National Planning Policy and Measure No. 5 – Lift and Stair Cores There shall be no requirement within statutory plans in respect of the number of units per floor per core.	Applicant’s Response Not relevant to the proposed application.
Section 3.7 – Internal Storage Minimum requirements for storage areas are set out in Appendix 1: - • Studio apartment 3 sq. m • 1-bedroom apartment 3 sq. m • 2-bedroom apartment (3 persons) 5 sq. m • 2-bedroom apartment (4 persons) 6 sq. m • 3-bedroom apartment(4 Persons) 6 sq. m • 3-bedroom apartment (5 persons) 9 sq. m Other considerations: - • No individual storage room within an apartment should exceed 3.5 sq. m. • Apartment schemes should provide storage for bulky items outside individual units (i.e. at ground or basement level).	Applicant’s Response In the first instance, we refer to the Housing Quality Assessment and the Architectural Design Statement prepared by OMP Architects for further details in relation to compliance with section 3.7 – Internal storage. We note a bulky goods and Bicycle store in provided in a pavilion at ground floor level in Block 3. We note all Apartment types meet or exceed the minimum storage area requirements set out in the guidelines. We refer the Planning Authority to the House Type Drawings and Housing Quality Assessment, prepared by O’Mahony Pike Architects for further detail. No individual storage rooms are larger than 3.5 sq. m.

Where secure, allocated ground or basement level storage is provided, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these guidelines.	
Section 3.8 – Private Amenity Space It is a policy requirement that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Minimum required areas for private amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment (4 Persons) 7sq.m • 3-bedroom apartment (5 persons) 9 sq. m A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the minimum floor area requirement under these guidelines. Vertical privacy screens should be provided between adjoining balconies and the floors of balconies should be solid and self-draining. The number of units without direct access to private amenity space within apartment schemes should not exceed 50%. Where the location and characteristics of the site allow for higher levels of private amenity space provision, for example on larger sites or in more suburban settings, higher levels of private amenity space should be provided.	Applicant's Response We refer the Planning Authority to the House Type Drawings and Schedule of Areas, prepared by O'Mahony Pike Architects for further detail. All duplex / apartments are provided with private patios / terraces.
Communal Facilities	
Section 4.2– Waste Management Waste storage facilities should be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and ensure adequate containers can be provided for residual, recyclable and food waste, to comply with waste management legislation, at designated waste storage points. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems. Section 5.3.6 of the SRDCSGs sets out that multi-unit refuse storage areas should be provided in open spaces that will not be taken in charge. Such facilities should be screened and integrated with surrounding structures/landscaping. Waste storage facilities may also be provided in basement areas, but must ensure adequate access and manoeuvring space for collection vehicles. Waste storage facilities should be designed so that they are adequately ventilated, well-lit and not accessible to the general public. The capacity for washing down waste storage areas should also be	Applicant's Response Dedicated bin stores are provided for the duplex / apartments. An Operational Waste Management Plan is enclosed with this application in this instance.

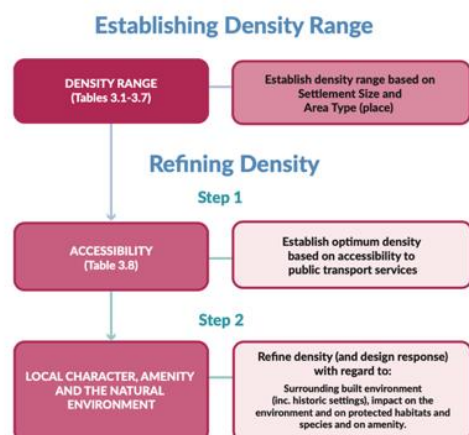
considered, with wastewater discharging to the sewer, as appropriate. Appendix C of the SRDCSGs also recommends that Operational Waste Management Plans be submitted in support of 30 or more residential units or 1,000 sq. metres of mixed-use development.	
Section 4.3 – Communal Amenity Space Minimum required areas for public communal amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment (4 Persons) 7sq.m • 3-bedroom apartment (5 Persons) 9 sq. m Communal amenity space may be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year. Roof gardens may also be provided but must be accessible to residents, subject to requirements such as safe access by children. These facilities offer a satisfactory alternative where climatic and safety factors are fully considered, but children's play is not passively supervised as with courtyards. Regard must also be had to the future maintenance of communal amenity areas in order to ensure that this is commensurate with the scale of the development and does not become a burden on residents. The Settlement Guidelines also state that new developments should adopt a nature-based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. This includes a range of measures such as detention areas, rainwater gardens, permeable paving and green roofs that may be provided in communal amenity spaces. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, communal amenity space may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality	Applicant's Response Dedicated communal open spaces areas are provided for the duplex / apartments. We refer the Planning Authority to the Schedule of Areas, prepared by O'Mahony Pike Architects which demonstrates that the minimum areas are comfortably exceeded.
Section 4.4 – Children's Play Children's play needs around the apartment building should be catered for: • Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and • Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms. The perimeter block with a central communal open space is particularly appropriate for children's play, especially if access from the street is controlled. The landscape design	Applicant's Response A creche is provided on the ground floor of Block 3, with an estimated capacity of c. 90 childcare places. A play area for the creche is provided at ground level with an external enclosed play area. In terms of children play landscaping drawing, prepared by Brady Shipman Martin Built Environment Consultants show playground equipment in the eastern and southern POS.

and orientation of play areas can contribute significantly to their amenity value. However, the noise from courtyard play areas can diminish residential amenity, particularly in smaller schemes, and designers must find solutions which balance all the factors involved.	
National Planning Policy and Measure No. 6 – Communal, Community and Cultural Facilities The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	Applicant's Response Not relevant in the proposed development.
National Planning Policy and Measure No. 7 – Shared Accommodation/Co-living Dependents There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process.	Applicant's Response Not relevant to the proposed application.
National Planning Policy and Measure No. 8 – Purpose-Built Student Accommodation The following requirements shall apply to Purpose-Built Student Accommodation (PBSA) and statutory plans shall not specify requirements that differ from or exceed the requirements specified below: (i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes. (ii) The minimum required area for a single study bedroom without en-suite facilities shall be 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities shall be 11.5 sq.m. (iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons shall be 3.6 sq.m and 3.3 sq.m per person, respectively.	Applicant's Response Not relevant to the proposed application.

Sustainable Residential Development and Compact Settlements Guidelines (2024)		<i>Sustainable Residential Development and Compact Settlements Guidelines (2024) set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.</i>
Section 3 – Settlement, Place & Density		
Policy and Objective 3.1 – Density Ranges It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in	Applicant's Response Having regard to Table 3.1 of the Guidelines the subject site is considered to be a Key Town – Centre and Urban	

the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

Figure 3.3:
Illustration of the process for establishing, optimising and refining appropriate density for a plan or development.



Neighbourhoods. As such a net density range of 50 to 150no. units per Ha shall generally be applied.

We submit the above clarification positively accords with the densities that apply, with the proposed density 76.2 dph, comfortably within the median of the 50 to 150dph residential density range.

Accessibility

The subject site and surrounding lands are currently well serviced by public transport (i.e. bus services – Route 45A, 45B, E1, L14) having 20 minute frequency.

Section 5 – Development Standards for Housing

Specific Planning Policy Requirement 1 – Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

Applicant's Response

We refer the Planning Authority to the Proposed Site Layout Plan Sheet 1 and Street Elevations, prepared by O'Mahony Pike Architects which demonstrate that the minimum separation distances have been exceeded across the development.

Specific Planning Policy Requirement 2 – Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq. m

Applicant's Response

We refer the Planning Authority to the Site Layout Plan, prepared by O'Mahony Pike Architects which demonstrate that the minimum private open space requirements for houses have been exceeded across the development.

- 2 bed house 30 sq. m
- 3 bed house 40 sq. m
- 4 bed + house 50 sq. m

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

Table 5.1 Minimum Private Open Space Standard for Houses

House	Minimum Private Open Space	Max Semi-Private (in lieu)
1 bed	20 sq.m	10 sq.m
2 bed	30 sq.m	15 sq.m
3 bed	40 sq.m	20 sq.m
4 bed+	50 sq.m	25 sq.m

Specific Planning Policy Requirement 3 – Car Parking

It is a specific planning policy requirement of these Guidelines that:

- In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.
- In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.
- In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that

Applicant's Response

A total of 289no. spaces are proposed as part of this development which is in line with the max standards set out in of the Development Plan.

the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.			
Specific Planning Policy Requirement 4 – Cycle Parking and Storage It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended: i. Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers. ii. Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.	Applicant’s Response A total of 435no. bike parking spaces are proposed for this development. Bike parking is proposed at the following breakdown, which exceeds the minimum standards set out in the Development Plan. The proposed development provides secure and conveniently located bicycle parking facilities which will include spaces. These provisions will further support a shift toward active travel patterns.		
Section 4.4 – Key Indicators of Quality Design and Placemaking			
 Sustainable and Efficient Movement Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars.	 Mix and Distribution of Uses Promoting the integration of land use and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice.	 Green and Blue Infrastructure Placing emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities.	 Responsive Built Form Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive.
(i) Sustainable and Efficient Movement a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate.		Applicant’s Response The proposed development has connected and walkable layout which ensures connectivity to the active travel route. The proposed scheme establishes pedestrian, cycle & vehicular connectivity with Old Connaught Avenue. Active travel routes are provided from east to west across the	

b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible. c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists. d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments.	subject site, connecting with future phases of development. A total of 435no. spaces are proposed as part of this development which is in line with the max standards set out in the Development Plan. The reduction of car parking in proximity to public transport facilities promotes modal shift.
Policy and Objective 4.1 – DMURS It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.	Applicant's Response We refer Planning Authority the Traffic & Transport Assessment, prepared by AtkinsRéalis Consulting which sets out how the layout of the proposed development is consistent with the Design Manual for Urban Roads and Streets.
(ii) Mix and Distribution of Uses a) In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development. b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved through the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres. c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout. d) In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car	Applicant's Response There is a range of apartments/duplexes and houses (semidetached and terraced) in 2 bed, 3 bed and 4 bed formats in properties ranging in height from 2 to 5 storeys. The unit sizes range from 45sq. m to in excess of 100sq. m in size. The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location.

parks at highly accessible urban locations that no longer require a high level of private car access). e) It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport. f) The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.	
(iii) Green & Blue Infrastructure a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts. b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below. c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised¹³. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.	Applicant's Response The proposal utilizes SUDS based solutions for urban drainage, including tree pits and green roofs. The scheme also proposes a regional attenuation pond in the north-east corner of the site.
(iv) Open Space b) Public open space provided as part of new development proposals. These spaces should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design. These spaces may be offered for taking in charge by the local authority following the completion of the development.	Applicant's Response The proposal contains two public open spaces, one to eastern side and one to the western side. The eastern public open space retains existing trees, and the western space facilitates an active travel route and visual connectivity between the wider scheme and the future Luas, promoting both active travel and public transport.
(v) Responsive Built Form	Applicant's Response The proposal has a coherent and legible urban structure, with aligns with the LAP. A variety of building heights and

a) New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points. b) New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces). c) The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible. d) Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages. e) New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage. f) Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable.	forms are proposed, with the larger forms addressing the main north-south avenue, and acting as gateways to the new settlement at Old Connaught. All proposed urban blocks are designed to have active edges on all four sides, with entrances and windows to habitable rooms providing passive supervision of all streetscapes. The proposals integrate well with the existing context, forming connections in line with the LAP. This phase of the development has limited impact on existing structures, please refer to the LVIA that forms part of this submission. The scheme is contemporary in nature, with generous windows and good quality materials. The distinctive apartment blocks and gable fronted avenue houses will establish a sense of place, and the mix of unit typologies will lead to a sustainable new community in Old Connaught.
Policy and Objective 4.2 – Quality Urban Design It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.	Applicant's Response Refer to responses above.
Policy and Objective 5.1 – Public Open Space It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations. In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a planned basis, having regard to the overall approach to public park provision within the area. In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.	Applicant's Response The proposal contains two public open spaces, one to eastern side and one to the western side. The eastern public open space retains existing trees, and the western space facilitates an active travel route and visual connectivity between the wider scheme and the future Luas, promoting both active travel and public transport.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.	
Section 5.3.6 – Operation and Management of the Development For developments that include multi-unit and compact housing blocks, communal facilities such as refuse storage areas should be provided in open spaces that will not be taken in charge. Planning applications should include an operational management plan that sets out details of the long-term management and maintenance of the scheme. The plan should address provisions made for the storage and collection of waste materials in residential schemes, particularly where there are reduced areas of private outdoor space. Communal refuse facilities shall be accessible to each housing unit and designed with regard to the projected level of waste generation and types and quantities of receptacles required.	Applicant's Response Bin stores are provided for all dwellings. Communal bin stores are provided for all duplex / apartments. We refer the Planning Authority to the architectural drawings and Architectural Design Statement, prepared by O'Mahony Pike Architects.
Section 5.3.7 – Daylight The provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high quality living environment for future residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties. In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.	Applicant's Response We refer the Planning Authority to the Sunlight & Daylight Analysis, prepared by Modelworks which concludes: - The proposed scheme's 168 apartments and duplexes achieved a high level of compliance with the BRE Guide for both daylight (98%) and sunlight (88%). The amenity spaces also achieved compliance for sunlight.
Appendix D: Design Checklist - Key Indicators of Quality Urban Design and Placemaking	

1. Sustainable and Efficient Movement i. Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)? ii. Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities? iii. Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users? iv. Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles?	Applicant's Response The proposed scheme establishes pedestrian, cycle & vehicular connectivity with Old Connaught Avenue. Active travel routes are provided from east to west across the subject site, connecting with future phases of development. We refer Planning Authority to the Traffic & Transport Assessment, prepared by AtkinsRéalis Consulting Engineers which sets out how the layout of the proposed development is consistent with the Design Manual for Urban Roads and Streets. A total of 289no. car parking spaces are proposed as part of this development which is in line with the max standards set out in the Development Plan.
2. Mix of Land Uses (Vibrant Centres and Communities) i. Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling? ii. Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice? iii. Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)? iv. Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)?	Applicant's Response The proposed development is located on greenfield lands within walking distance of public transport in the form of bus services at Old Connaught. The proposed development provides secure bicycle parking facilities which will further support a shift toward active travel patterns. There is a range of apartments/duplexes and houses (semidetached and terraced) in 2 bed, 3 bed and 4 bed formats in properties ranging in height from 2 to 5 storeys. The unit sizes range from 45sq. m to in excess of 100sq. m in size.. The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location.
3. Green and Blue Infrastructure (Open Space, Landscape and Heritage) i. Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes? ii. Have a complementary and interconnected range of open spaces, corridors and planted/landscaped areas been provided, that create and conserve	Applicant's Response The proposal responds positively to its context. Existing mature trees along the southern boundary of the scheme are retained in a public open space. The scheme proposes active travel links to a future public open space within the nearby walled garden (Protected Structure). The existing site is sloped, and the scheme works with the existing levels to minimise cut and fill, and to provide accessible routes throughout the scheme. The proposal contains two public open spaces, one to eastern side and one to the western side. The eastern

ecological links and promotes active travel and healthier lifestyles? iii. Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)? iv. Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?	public open space retains existing trees, and the western space facilitates an active travel route and visual connectivity between the wider scheme and the future Luas, promoting both active travel and public transport. Public Open Spaces are designed to be accessible to all, and to provide a range of active and passive uses. The proposal utilises SUDS based solutions for urban drainage, including tree pits and green roofs. The scheme also proposes a regional attenuation pond in the north-east corner of the site, in line with the LAP.
4. Responsive Built Form i. Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight? ii. Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface? iii. Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent? iv. Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity?	Applicant's Response The proposal has a coherent and legible urban structure, with aligns with the LAP. A variety of building heights and forms are proposed, with the larger forms addressing the main north-south avenue, and acting as gateways to the new settlement at Old Connaught. All proposed urban blocks are designed to have active edges on all four sides, with entrances and windows to habitable rooms providing passive supervision of all streetscapes. The proposals integrate well with the existing context, forming connections in line with the LAP. This phase of the development has limited impact on existing structures, please refer to the LVIA that forms part of this submission. The distinctive gable fronted avenue houses will establish a sense of place, and the mix of unit typologies will lead to a sustainable new community in Old Connaught.

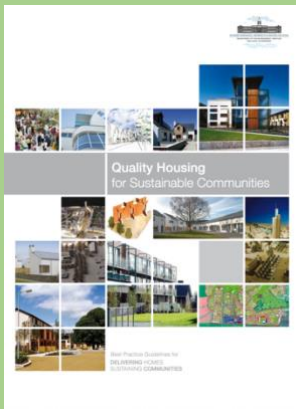
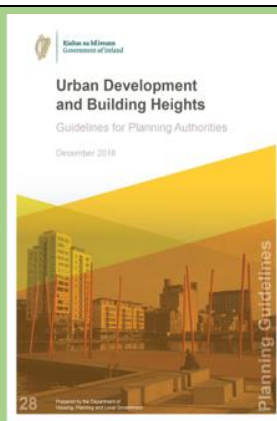
Quality Housing for Sustainable Communities (2007)		<i>Quality Housing for Sustainable Communities (2007) identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant.</i>
Table 5.1 (below) sets out the space provision and room sizes for typical dwellings which all houses within a proposed development must adhere to these standards.	Applicant’s Response We refer the Planning Authority to the House Type Drawings, prepared by O’Mahony Pike Architects for further detail. A full Housing Quality Assessment has been included with the LRD planning application prepared by O’Mahony Pike Architects.	

Table 5.1: Space provision and room sizes for typical dwellings

DWELLING TYPE	TARGET GROSS FLOOR AREA (m ²)	MINIMUM - MAIN LIVING ROOM (m ²)	AGGREGATE LIVING AREA (m ²)	AGGREGATE BEDROOM AREA (m ²)	STORY
Family Dwellings - 3 or more persons					
4BED/7P House (3 storey)	120	15	40	43	€
4BED/7P House (2 storey)	110	15	40	43	€
4BED/7P House (1 storey)	100	15	40	43	€
4BED/7P Apartment	105	15	40	43	1
3BED/6P House (3 storey)	110	15	37	36	€
3BED/6P House (2 storey)	100	15	37	36	€
3BED/6P House (1 storey)	90	15	37	36	€
3BED/6P Apartment	94	15	37	36	1
3BED/5P House (3 storey)	102	13	34	32	€
3BED/5P House (2 storey)	92	13	34	32	€
3BED/5P House (1 storey)	82	13	34	32	€
3BED/5P Apartment	86	13	34	32	€
3BED/4P House (2 storey)	83	13	30	28	€
3BED/4P House (1 storey)	73	13	30	28	€
3BED/4P Apartment	76	13	30	28	€

Urban Development & Building Heights Guidelines for Planning Authorities (2018)



Urban Development & Building Heights Guidelines for Planning Authorities (2018) outline wider and strategic policy considerations and a more performance criteria driven approach that planning authorities should apply alongside their statutory development plans in securing the strategic outcomes of the National Planning Framework.

Section 3.1 - Development Management Principles

In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?

Applicant's Response

The prevailing heights in the area are 2 storeys. However, the adopted Old Connaught LAP establishes a plan-led building height strategy to facilitate the sustainable growth of the area, recognizing that increased heights are appropriate in specific locations to support compact development, placemaking and the delivery of a sustainable urban village. The proposed development has been designed in accordance with the LAPs Building Height Strategy.

The development in question will assist in meeting National Strategic Objectives through the provision of a Key Town.

The present Dun Laoghaire-Rathdown County Development Plan 2022-2028 (as varied) was prepared having regard to the provisions of these Guidelines.

As the Dun Laoghaire-Rathdown County Development Plan 2022-2028 does not pre-date these Guidelines, the third bullet is not relevant.

Arising from the above, it is considered that SPPR 4 of the Guidelines are applicable in this case.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

SPPR 3

It is a specific planning policy requirement that where;

- (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and
2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme

(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.

In this case, it is the provisions of SPPR 3(A) that apply.

Section 3.2 Development Management Criteria

At the Scale of the Relevant City / Town

The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.³ Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

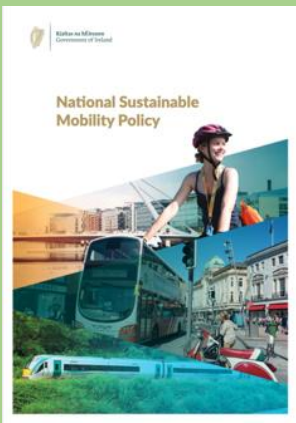
Applicant's Response

In terms of density, SPPR 4 refers to the 'Sustainable Residential Development in Urban Areas' Guidelines, or 'any amending or replacement Guidelines'. The Sustainable Residential Development and Compact Settlement Guidelines (2024) replaced 'Sustainable Residential Development in Urban Areas'. The proposed development is consistent with Specific Planning Policy Requirement 4 of the Urban Development and Building Heights Guidelines. The Planning Authority are directed to the planning drawings prepared by O'Mahony Pike Architects, their Design Statement and the other material accompanying this planning application. 1. The Sustainable Residential Development and Compact Settlement Guidelines (2024) note that in the context of Key Town – Centre and Urban Neighbourhoods sites, such as the subject land, the greatest efficiency in land usage will be achieved by providing net residential densities in the general range of 50 - 150 dwellings per hectare.

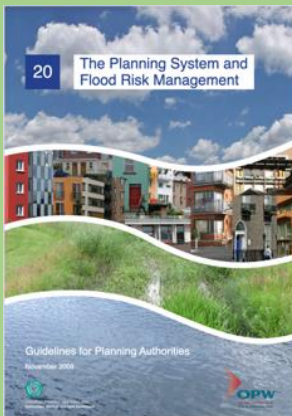
We submit the above clarification positively accords with the densities that apply, with the proposed density 76.2

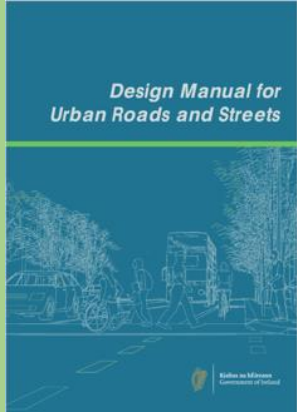
	dph, comfortably within the median of the 50 to 150dph residential density range. The proposed development proposes a variety of buildings ranging between 2 and 5-storey's height.
At the Scale of District / Neighbourhood / Street The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape. The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered. The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009). The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner. The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	Applicant's Response The subject application proposes the following building heights: 5 storey Apartment Blocks 1 & 2, in the eastern portion of the Central Character Area. The buildings provide a strong urban edge to the eastern side of Old Conna; A 4 and 5 storey apartment building is located at the northern entrance to Old Conna, at the junction of the primary north-south street and the east west street 3 & 4 storeys to Apartment Blocks 4, in Central Character Area - Central; 3 storey houses form the streetscape on the western side of the primary north-south street; A mixture of 3 storey duplexes, 3 storey houses and 2 storey houses form the streetscape on the eastern side of the primary north-south street; The majority of houses in the Central Character Area - Central are 2 storeys. All proposed building heights are in compliance with the height diagram in the Old Connaught LAP. The proposal is not monolithic and does not include uninterrupted walls of building in the form of slab blocks. As noted above, high quality finishes and materials are being proposed for these buildings, which have been carefully considered by O'Mahony Pike Architects. The proposed built form creates a sense of enclosure to the public open space and provides permeability. A wide range of residential unit types and sizes are proposed, thereby avoiding monotype building typologies. The proposals provide homes across wide range of sizes thereby ensuring a significant range of typologies for occupiers to choose from that will meet the needs of a wide range of household sizes. The materials and finishes of the proposed development have been designed to a high architectural standard.
At the Scale of the Site / Building The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including	Applicant's Response The proposed massing and height are designed to achieve appropriate density, but with a variety in scale and form to respect and respond to the scale of adjoining dwellings and open spaces. The variation in height, form and massing also creates visual interest in the streetscape. The buildings proposed are orientated to maximise access to natural daylight while appropriate massing has been implemented as to not overshadow adjacent buildings and areas of open space. The Stage 3 Application will be accompanied by a Sunlight & Daylight Assessment Report, prepared by Modelworks.

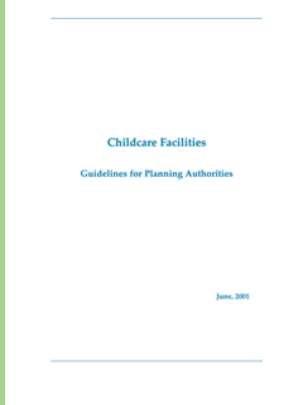
specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	
Specific Assessments To support proposals at some or all of these scales, specific assessments may be required and these may include: • Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered. • In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision. • An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. • An assessment that the proposal maintains safe air navigation. • An urban design statement including, as appropriate, impact on the historic built environment. • Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	Applicant's Response Architectural Design Statement: We refer the Planning Authority to the Design Statement, prepared by O'Mahony Pike Architects. Sunlight and Daylight Assessment: Refer to the enclosed Sunlight & Daylight Assessment Report, prepared by Modelworks. Relevant Environmental Assessments: A Preliminary AA Screening and Ecological Impact Assessment Report prepared by Brady Shipman Martin Built Environment Consultants are enclosed with this application.

National Sustainable Mobility Policy		The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel and public transport to support Ireland’s overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.
Support People Focused Mobility by: - - Continuing to make existing and new walking, cycling and public transport networks more accessible for all users. - Implementing a universal design approach in the design of walking, cycling and public transport infrastructure and in the retrofitting of older infrastructure.	Applicant’s Response The proposed scheme establishes pedestrian, cycle & vehicular connectivity with Old Connaught Avenue. Active travel routes are provided from east to west across the subject site, connecting with future phases of development. A total of 289no. car parking spaces are proposed as part of this development which is in line with the max standards set out in the Development Plan. The reduction of car parking in proximity to public transport facilities promotes modal shift.	
Support Better Integrated Mobility by: - Adopting a transport-orientated housing development approach.		

Identifying housing delivery areas within a 1 km distance of public transport stops with the best potential to grow.	
Principles and Goals Better Integrated Mobility 9. Better integrate land use and transport planning at all levels.	

The Planning System and Flood Risk Management (2009)		<i>The Planning System and Flood Risk Management (2009) guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.</i> <i>The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.</i>
Applicant's Response A Flood Risk Assessment Stage 1 and 2, prepared by AtkinsRéalis Consulting Engineers has been set out in accordance with the Planning System and Flood Risk Management Guidelines for Local Government (2009) and accompanies this planning application. The Flood Risk Assessment generally concludes that: - <i>"The majority of the site is located within Flood Zone C, with only limited encroachment of Flood Zones A and B into peripheral areas of the development lands. Application of the Sequential Approach has informed the site layout and all residential dwellings, apartment buildings and other highly vulnerable development have been located within Flood Zone C. Limited infrastructure elements including sections of road and buried utilities occur within Flood Zones A and B; however, these elements will not impede flood flows or increase flood risk elsewhere. The development incorporates surface water management measures, exceedance flow routing, climate change allowances and finish floor levels outside the extents of flood zones. The proposed development can therefore be developed safely without giving rise to unacceptable flood risk to people, property or the surrounding environment. The Stage 2 Initial Flood Risk Assessment has demonstrated that the proposed development is compatible with the identified flood risk constraints and that vulnerable development has been directed towards Flood Zone C in accordance with the Planning System and Flood Risk Management Guidelines. No further flood risk assessment is considered necessary to support this planning application."</i>		

Design Manual for Urban Roads & Streets (2013)		<i>The stated objective of Design Manual for Urban Roads and Streets (DMURS) is to achieve better street design in urban areas. This will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant. It will lower traffic speeds, reduce unnecessary car use and create a built environment that promotes healthy lifestyles and responds more sympathetically to the distinctive nature of individual communities and places. The implementation of DMURS is intended to enhance how we travel to and from business; enhance how we interact with each other and have a positive impact on our enjoyment of the places to and through which we travel.</i>
Applicant's Response We refer the Planning Authority to the DMURS Statement, prepared by AtkinsRéalis Consulting Engineers which sets out how the layout of the proposed development is consistent with the Design Manual for Urban Roads and Streets. The proposed development is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013. The scheme proposed is the outcome of an integrated design approach that seeks to implement a sustainable community connected by a well-designed street which delivers safe, convenient and attractive networks.		

Childcare Facilities, Guidelines for Planning Authorities (2001)		<i>These Guidelines for Planning Authorities on Childcare Facilities (2001) provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. Planning permission for premises for childcare had been identified as an area of concern for childcare service development. These Guidelines are intended to ensure a consistency of approach throughout the country to the treatment of applications for planning permission for childcare facilities.</i>
Section 2.4 of the Guidelines set out general standards for the land use planning issues related to childcare provision in Ireland. In relation to 'New Communities / Larger New Housing Developments', it is noted that "planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments." The Guidelines outline that childcare facility provision should be made on the basis of 20no. childcare spaces for every 75no. dwellings permitted in a scheme.	Applicant's Response The proposed development includes the provision of a creche (c. 574sqm) at ground floor of Apartment Block 3 with an estimated capacity of c. 90 childcare spaces, with a dedicated external play area (225.4sqm) The proposed development comprises 271no. dwellings, including 49no. 1-bed apartments, 113no. 2-bed apartments, 6no. 3-bed duplexes, 13no. 2-bed houses, 68no. 3-bed houses, and 22no. 4-bed houses. The proposed development will create a theoretical demand for c. 43no. childcare spaces based on the omission of all 1-bed units and 50% of 2-bed apartment and houses. We refer to the Architectural Design Statement, prepared by O'Mahony Pike Architects.	

