

LRD Planning
Application to
Dun Laoghaire
Rathdown
County Council

Response to
LRD Opinion

Proposed Large-Scale
Residential
Development

At Lands North of Old
Connaught Avenue,
Old Connaught, Co.
Dublin.

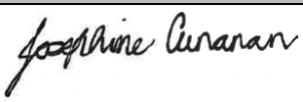
For Castlethorn Old
Connaught UCL

JULY 2026

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Document Control: -

Author	Checked by	Purpose	Date
		Draft	29.06.2026
	Richard Kealey	Final Draft	21.07.2026
Richard Kealey		Final	27.07.2026

1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26/27 Upper Pembroke Street, Dublin 2 D02 X361, are instructed by the Prospective Applicant, Castlethorn Old Connaught UCL, to prepare this Response to LRD Opinion to accompany a planning application for Large-Scale Residential Development (LRD).

We can confirm that an LRD Stage 2 meeting was held with the Planning Authority on 26th March 2026 as required under Section 32 of the Planning & Development Act 2000, as amended.

Dun Laoghaire-Rathdown County Council issued the Planning Authority LRD Opinion, dated 22nd April 2026. This confirmed that the documentation submitted in accordance with Section 32B of the Act required further consideration and amendments, to constitute a reasonable basis for an LRD application. The Opinion identifies under section 9 that the material presented by the applicant and the issues raised during the consultation process has potential to align with the proper planning and sustainable development of the area, subject to the Applicant addressing the issues raised in the LRD Opinion to the satisfaction of the planning authority.

This document provides the Applicant's response to the specific issues raised in the LRD Opinion by the Planning Authority.

We refer otherwise to the Planning Application Report and Statement of Consistency, which accompanies the LRD application as a separate standalone report, for confirmation that the proposed scheme is consistent with the relevant National and Regional strategic planning policies, with the relevant Ministerial Guidelines and with the policies and objectives of the Dun Laoghaire-Rathdown County Council Development Plan 2022-2028 and Old Connaught Local Area Plan 2025.

2 DESCRIPTION OF PROPOSED DEVELOPMENT

Following s.247 consultation and the Section 32C LRD meeting with the planning authority, planning permission is now sought for the proposed LRD development described in brief as follows: –

The development to which this submission relates involves a proposal for a Large-Scale Residential Development (271no. dwellings, a creche, pumping station with twin rising mains and site works). The gross site area measures c.6.9 hectares, at lands to the north of Old Connaught Avenue, at Old Connaught, Bray, Co. Dublin. Foul drainage infrastructure works (pumping station and rising mains), serving the wider Old Connaught LAP lands, extend the red line site area under and c. 125m east of the N11/M11.

Old Connaught refers to the zoned lands west of M11 covered by the Old Connaught Local Area Plan 2025. The subject site is situated on the lands identified as Phase A, Sub-Phase 1 by the LAP.

The Old Connaught LAP makes provision for a bridge crossing adjacent the M11, road and active travel facilities, and also a Green Luas line reservation corridor, to be accommodated in part within the site.

The proposed development will provide a significant amount of the road network which will serve the wider LAP area and represents some of the key infrastructure needed to facilitate the development of further zoned lands and unlock plan-led housing delivery within the LAP area.

The subject site is zoned A1 - Residential in the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028. A 7m LUAS reserve corridor travelling north to south transects the site. A strategic road reservation along the M/N11 lies to the east of and outside the application site boundary.

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. ground floor 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, 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.

All of the proposed dwellings are located on lands zoned “**Objective A1 – To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans**” under the Dún Laoghaire-Rathdown County Development Plan 2022-2028, as varied. The Old Connaught Local Area Plan 2025 reconfirms this zoning objective and identifies the application site as being located within the central character area.

As the development is for greater than 100no. dwellings and those dwellings are all proposed on land zoned for residential development, the proposed amounts to a Large-scale Residential Development.

We refer otherwise to the Planning Application Report and Statement of Consistency, which accompanies the LRD application as a separate standalone report.

3 APPLICANTS RESPONSE TO LRD ISSUES RAISED

3.1 Opinion Responses

3.1.1 Phasing Requirement of Local Authority Plan – Pump Station Provision

The Applicant is requested to address the following:

“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.’*

Whilst the Planning Authority note that the pumping station may be progressed in tandem with a planning application for residential development, the provision of a wastewater pumping station is dependent on achieving initial acceptance from Uisce Éireann. It is noted that this is not proposed to be progressed by the Applicant as part of the subject LRD. Instead, it is currently being progressed by DLR Housing Department as part of a Part 8 scheme adjacent to the subject site.

In this regard, DLR appointed a consultant in September 2024 to bring the pumping station through feasibility and site selection with a view to securing Part 8 approval. In late 2025, Uisce Éireann advised DLR that funding had potentially become available to them for the foul pumping station and Uisce Éireann sought to become involved in project progress and reviewing the decisions made to date. DLR is currently awaiting a full suite of comments from Uisce Éireann. In this context, DLR is not in a position to progress the preparation of a Part 8 application and, as a result, there is currently no timeframe for obtaining consent for the pumping station.

DLR continues to emphasise the urgency of bringing this process to a resolution to finalise the pumping station location to give certainty to adjacent projects. It is recommended that other interested parties should also continue to seek engagement from Uisce Éireann with a view to securing agreement.

In response to the LRD Stage 2, Uisce Éireann provided comments (see Appendix D), which states that whilst a wastewater connection is feasible subject to upgrades, they are at a preliminary stage of the project to provide a strategic pumping station to serve the Old Connaught Local Area Plan area and are still reviewing the options for the delivery of this infrastructure.

*Given the LAP sets out a clear requirement to provide a wastewater treatment either in tandem with or prior to residential development being granted permission, and noting that Uisce Éireann and DLR are still in the early stages of progressing proposals for the pumping station, **the Planning Authority is of the opinion that any application for residential development which does not also include the wastewater pumping station would be premature and non-compliant with Table 11.1 and potentially in material contravention the Phasing Strategy for the Old Connaught LAP.**”*

[Emphasis added by SLA]

Applicant’s Response

The Applicant hereby confirms the inclusion of the permeant pumping station and associated infrastructure as part of the proposed LRD application.

This includes a new pumping station, twin rising mains extending circa 400m along Old Connaught Avenue under the M11 and connecting to the existing gravity foul network c. 125m east of the M11 bridge. Also, associated storage, together with all associated site development and reinstatement works required to facilitate the implementation of these works.

The design of the proposed foul pumping station and twin rising mains for the Old Connaught Local Area Plan lands has been prepared by AtkinsRealis Consulting Engineers (Refer to the Foul Pump Station and Rising Main report and Engineering Planning Report, prepared by AtkinsRéalís Consulting Engineers), in close consultation with Uisce Eireann and Dun Laoghaire-Rathdown County Council.

We, refer the Planning Authority to the following **pumping station and associated infrastructure drawing prepared by Atkins Realis** for the plans and particulars in respect to the construction of the Waste Pumping Station and wastewater network connection:

- ATK-ZZ-ZZ-DR-CE-900575
- ATK-ZZ-ZZ-DR-CE-900576
- ATK-ZZ-ZZ-DR-CE-900577
- ATK-ZZ-ZZ-DR-CE-900578
- ATK-ZZ-ZZ-DR-CE-900579
- ATK-ZZ-ZZ-DR-CE-900580
- ATK-ZZ-ZZ-DR-CE-900585
- ATK-ZZ-ZZ-DR-CE-900586
- ATK-ZZ-ZZ-DR-CE-900587
- ATK-ZZ-ZZ-DR-CE-909007
- ATK-ZZ-ZZ-DR-CE-900581

This represents the long term permeant solution and has been designed in connection with Uisce Eireann.

We note that the Consent Area drawing that accompanied the requested letter of consent from DLRC 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 DLRC. It has therefore been concluded that only a letter of consent from DLRC is required for the purpose of making this planning application, as stated in the Application Form and as attached with this application.

Notwithstanding that the issues raised in the Opinion focus on waste/foul network constrains, the proposed scheme also includes all other infrastructure identified as being required for Phase 1 development, in Table 11.1 of the LAP.

The proposed development also includes new vehicular access, active travel pedestrian and two-way dedicated cycle lanes, extending along the proposed North-South link road from Old Connaught Avenue.

A portion of the regional attenuation pond is proposed in the north east of the site.

The above works are in accordance with the infrastructure phasing Table 11.1 of the Old Connaught Local Area Plan 2025. This will ensure sufficient infrastructure is in place at Phase 1, to unlock other zoned lands for development under future phases of the LAP.

dlrcoco | Old Connaught Local Area Plan

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 1: Table 11.1 Old Connaught Phase A1 (Extract from Old Connaught Local Area Plan)**3.1.2 Standards of Accommodation – Minimum Apartment Floor Areas**

The Applicant is requested to address the following:

“The proposed apartment/duplex units should comply with County Development Standards unless superseded by SPPRs set out in the Design Standards for Apartments, Guidelines for Planning Authorities (2025). Where there is deviation in the Apartment Guidelines 2025 which are not specific SPPRs, the County Development Plan will be applied which includes the percentage of oversized units.

As submitted, 37 no. units are oversized by 10% which equates to 22% of the total proposed apartment/duplex units. This does not meet the current Development Plan 2022-2028 requirement of at least 51% (set out in Section 12.3.5.5) nor does it meet the non-SPPR guidance of Apartment Guidelines 2025 of at least 25%. Based on the current County Development Plan 2022-2028, in force at the time of writing this Opinion, the proposed notable under-provision of oversized units is considered to potentially result in a Material Contravention of the current Development Plan 2022-2028..”

[Emphasis added by SLA]

Applicant’s Response

While the proposed development is also designed to meet Universal Design standards for adaption for needs of Older Persons (see Section 8 of Architects Design Statement), the response below specifically addresses the apartment design standards SPPR 2 of the Apartment Guidelines, reinforced by forthcoming Variation No.1, with Material Amendment 12, of the Dun Laoghaire Rathdown County Development Plan 2022-2028.

26.8% of the proposed apartments are oversized by a minimum of 10%. This is in excess of the Design Standards for Apartments Guidelines 2025 requirements that 25% of all proposed apartments be oversized.

The minimum floor area requirements, as identified in supporting text of Specific Planning Policy Requirement (SPPR) 2 of the Apartment Guidelines (2025), are stated as being:

*“In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes. Accordingly, at least **25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%**, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered under Part V and schemes to provide housing for older persons and/or persons with disabilities.”*

Proposed Variation No.1 and **Material Amendment 12** amend **Section 12.3.5.5** of the County Development Plan 2022-2028. They remove the requirement to seek the majority (51%) of the proposed units to be oversized. This is replaced with the requirement of the Apartment Design Guidelines 2025 that at least 25% of the units exceed the minimum sizes by 10%, in an effort to enhance the viability of apartment schemes.

In this context, 26.8% of the proposed units exceed the minimum floor area. This is comfortably above the 25% standard set down by SPPR 2 of the Guidelines.

In light of the upcoming amendments to the County Development Plan and having regard to the relevant planning Guidelines, the development is respectfully submitted to represent a balanced approach, which is consistent with the proper planning and sustainable plan-led development of the 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.

Chapter 12: Development Management

Proposed Material Alteration No. 8

Amend **Proposed Variation Item No. 22** County Development Plan Section 12.3.5.5 Minimum Apartment Floor Areas, page 241, by deleting text in the first paragraph, deleting the paragraph after table 12.4: Minimum Overall Apartment Floor Areas, and adding addition text and tables underneath, as follows:

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 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 bed, by a minimum of 10% (excluding studios)~~

~~*Not applicable to BTR development in accordance with SPPR8.~~

For the purposes of clarity:

- All apartment floor area measurements should be internal wall-to-wall dimensions.
- These standards apply to units on one floor.
- Duplex accommodation shall provide the additional floor area required to provide for stairways and landings.

To promote sustainable, high-quality urban development, developments should ensure a balanced mix of apartment sizes within each scheme:

- At least 25% of all apartments in a development must exceed the minimum floor area standards set out in Table 12. 4 by at least 10%.
- This applies to any combination of unit types (studio, 1-bedroom, 2-bedroom, or 3-bedroom etc.).

In certain cases, more than 25% of units may need to exceed the standards set out in Table 12.4 minimum floor areas. This will be assessed on a case-by-case basis, particularly for:

- Suburban apartment schemes.
- Social housing developments.
- Social and affordable housing delivered under Part V.
- Housing for older persons and/or persons with disabilities.

The 25% requirement does not apply to:

- Developments with fewer than 10 residential units.
- Building refurbishment schemes (any site size).
- Urban infill schemes on sites up to 0.25 hectares.

Within Developments with 10–49 Units the 25% rule generally applies. However, to allow flexibility, the requirement may be partially or fully reduced following a case-by-case assessment by the Planning Authority. Any reductions will only be considered where the overall design quality justifies it.

Figure 2: Proposed Material Alteration No.8 of Variation No.1 of the DLR County Development Plan 2022-2028 – Extract from Chief Executive's Report to Members. Relevant text outlined in black.

3.2 Additional Comments

3.2.1 Planning

Density

“Clarification is required in terms of net site area and its calculation in order to adequately assess proposed density. Details of how the proposed net site area has been calculated having regard for the guidance set out in Appendix B: Measuring Residential Density of the Compact Settlements Guidelines 2024 should be provided including plans indicating relevant gross and net site areas.”

Applicant’s Response

The gross site area of the site is 6.8963 Ha.

The net site area of the site is 3.5579 Ha.

The proposed development has regard to the methodology for calculating net site area contained in Appendix B of the Sustainable Residential Development and Compact Settlement, Guidelines (2024).

As further clarified in the enclosed **Architectural Design Statement, prepared by O’Mahony Pike Architects** (p.20 & 73), the gross site area corresponds with the application site red line area. The net site area excludes the following areas from the gross site area, in accordance with the methodology set out in Table 1 of Appendix B of the Guidelines:

- The major north-south and east-west arterial streets, the alignment of which is determined by the LAP.
- The pump-station and associated wayleaves or rights of way to the south of the site.
- The regional attenuation pond in the northeastern corner of the site.

NET SITE AREAS

The red line area for the subject application extends to include service/infrastructure zones to both the north and south of the housing development areas.

The net site area of the subject site is shown by the coloured hatching on the diagram on this page, i.e. the net site areas exclude the lands required for service/infrastructure zones, such as:

- Regional attenuation area;
- Primary north-south link street;
- Primary east-west link street;
- Services connections & pump station;



Diagram showing net site areas and the red line boundary

CHAPTER 02 | SITE STRATEGY

20 | mahony pike PlanningApplication#OldConnaughtAvenueBray,CodublinJrdStage3PlanningApplicationDesignStatement

Figure 3: Net site areas, extract from Architectural Design Statement prepared by O’Mahony Pike Architects

Thereafter, the Compact Settlement Guidelines sets out the methodology for the determination of appropriate densities, having regard to the relevant settlement hierarchies. Figure 3.3 of the Compact Settlements Guidelines illustrates how to establish, optimise and refine appropriate density for a given settlement, site location and characteristics.

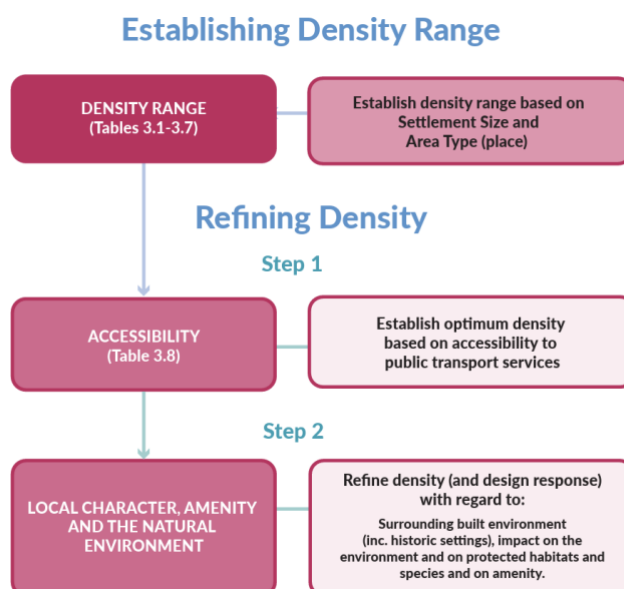


Figure 4: Extract of Figure 3.3 ‘Establishing Density Range’ from the Compact Settlement Guidelines 2024.

Table 3.1 of the Compact Settlements Guidelines set out the density ranges for Key Towns which includes Bray, as the application site sits outside the current ‘Dublin City and Suburbs’ boundary designated per the CSO maps.

The RSES and County Development Plan allow for the targeted application of residential density to the key town of Bray. The Old Connaught lands can be considered a ‘Key Town – Centre and Urban Neighbourhoods’ location, 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.**”

As previously clarified, the net site area is c.3.6ha and the gross site area is c 6.9ha.

The proposed density, at 76.2 dph, sits comfortably within the median of the 50 to 150dph residential density range.

The proposed Old Connaught Phase A1 LRD represents the proper and sustainable development of the Old Connaught LAP lands, by achieving sustainable residential density that aligns the built environment and the integrated enhancement of the residential amenities and biodiversity of the surrounding landscape.

We refer the Planning Authority to the enclosed **Architectural Design Statement, prepared by O’Mahony Pike Architects.**

Height

“The LAP identifies appropriate height range of 2-3 storeys for houses and 4-4+setback on the subject site.

Policy OCLAP18 – Building Height states:

‘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 SP3 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.’*

If heights above the range identified in the LAP are proposed, details of compliance with Policy Objective BHS2 and Table 5.1 of Appendix 5 of the County Development Plan 2022-2028 should be provided.”

Applicant’s Response

We refer the Planning Authority to the height diagram & associated text in the **Architectural Design Statement, prepared by O’Mahony Pike Architects.**

Proposed building height is generally consistent with the LAP parameters.

The only deviation is in respect of proposed Block 3, which is 4 and 5 storeys in height. 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 stepped building height from 4 to 5-storeys at Block 3 was discussed with the planning authority at both s.247 and LRD Stage 2 pre-planning consultation, and was received favourably on both occasions: -

“The Planning Authority expressing support for Block 3 as a strong corner element in the scheme. The PA directed the applicant to section 4.3 of the LAP which covers building heights and density. Figure 4.3 indicates a 4-storey element at this location, but there may be scope for a 5-storey element if the applicant can justify it and demonstrate accordance with the LAP, section 4.3.4 of the LAP.”

Policy Objective BHS2 of Appendix 5 of the statutory County Plan (Building Height Strategy) states:

*Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan). It is a policy objective to promote and support proposed heights as set out in any approved statutory Local Area Plans and as set out for certain areas in this County Development Plan (Sandyford Urban Framework Plan area, Dundrum Urban Framework Plan Area and Dun Laoghaire Urban Framework Plan area). Having regard to the **Building Height Guidelines and more specifically in order to apply SP3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above on the basis of placemaking.** In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in **table 5.1 which is contained in section 5.** The onus will be on the applicant to demonstrate compliance with the criteria. Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.*

Please see the below adaptation of table 5.1 of the DLR CDP Appendix 5, which includes the applicant’s response to this minor addition in height. We trust this meets the Planning Authority’s satisfaction.

At County Level	Applicant's Response
A) Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.	The Planning Application Report and Statement of Consistency, prepared by Stephen Little & Associates demonstrates that the proposal gives effect to the First Revision to the National Planning Framework, the RSES and the Dún Laoghaire-Rathdown County Development Plan 2022-2028 by delivering compact, plan-led residential development on lands specifically identified for growth within the Old Connaught Local Area Plan 2025.
B) Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport	A Mobility Management Plan has been prepared by AtkinsRéalis Consulting Engineers demonstrating the site's accessibility by existing and planned public transport. The proposal is served by existing bus services and BusConnects routes and safeguards the future Luas Green Line extension through the provision of the reserved corridor identified in the Old Connaught LAP 2025.
C) Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.	The Architectural Design Statement, prepared by O'Mahony Pike Architects, and the Landscape and Visual Impact Assessment, prepared by Model Works, demonstrate that the proposed development has been carefully designed to respond to the site's topography, landscape setting and the urban design objectives of the Old Connaught Local Area Plan 2025. The proposal delivers a high-quality public realm through a legible street hierarchy, active frontages, high-quality public open spaces and landscaped streetscapes, while reinforcing the character of the emerging neighbourhood. The development integrates successfully with the surrounding area and enhances the overall quality, legibility and identity of the public realm.
D) Protected Views and Prospects: Proposals should not adversely affect the skyline or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view	A Landscape and Visual Impact Assessment, prepared by Model Works, confirms that the proposed development has been designed having regard to the site's landscape setting and does not adversely impact protected views or prospects identified within the Development Plan.
E) Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.	The application is supported by Engineering Services, Water Services, Flood Risk and Traffic & Transport Assessments, which demonstrate that the proposal can be appropriately serviced. The development also delivers strategic infrastructure, including the primary north-south street, wastewater pumping station and rising main, active travel infrastructure phasing requirements of the Old Connaught LAP 2025.

At District / Neighbourhood / Street Level	Applicant's Response
A) Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.	The Architectural Design Statement, prepared by O'Mahony Pike Architects demonstrates that the proposed development responds to the character areas, movement framework and urban structure established by the Old Connaught Local Area Plan 2025, creating a high-quality residential neighbourhood with a strong sense of place.
B) Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks	The Architectural Design Statement, prepared by O'Mahony Pike Architects demonstrates that the proposed buildings comprise a varied composition of houses, duplexes and apartment buildings, with articulation in building form, height, materials and setbacks to create visual interest and avoid monolithic building forms.
C) Proposal must show use of high quality, well considered materials.	The Architectural Design Statement and accompanying Architectural Drawings, prepared by O'Mahony Pike Architects demonstrate a high-quality material palette and architectural detailing appropriate to the character of the development.
D) Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.	The Landscape Design Statement, prepared by Brady Shipman Martin Built Environment Consultants, and Architectural Design Statement, prepared by O'Mahony Pike Architects, demonstrate that the proposal delivers high-quality public open spaces, streetscapes and active frontages, which enhance the public realm and contribute positively to the movement network identified in the Old Connaught Local Area Plan 2025.
E) Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.	The proposed street hierarchy, strategic north-south street, pedestrian and cycle connections and clearly defined public spaces provide a legible movement network and facilitate future connections to adjoining lands. We refer to the Photomontages and CGIs, prepared by Model Works.
F) Proposal must positively contribute to the mix of uses and / or building / dwelling typologies available in the area.	The proposal provides a diverse range of houses, duplexes and apartments, together with a childcare facility and supporting public open spaces, contributing to the creation of a balanced and sustainable community.
G) Proposal should provide an appropriate level of enclosure of streets or spaces.	The Architectural Design Statement, prepared by O'Mahony Pike Architects, demonstrates that buildings are positioned to provide appropriate enclosure of streets and public spaces while maintaining high standards of residential amenity.
H) Proposal should be of an urban grain that allows meaningful human contact between all levels of	The proposed development provides active frontages, overlooking of streets and open spaces, and a permeable layout that promotes passive surveillance and interaction with the public realm.

buildings and the street or spaces.	
I) Proposal must make a positive contribution to the character and identity of the neighbourhood.	The Architectural Design Statement, prepared by O'Mahony Pike Architects demonstrates that the development establishes a distinctive identity through varied character areas, high-quality architecture, landscaping and public realm consistent with the vision of the Old Connaught Local Area Plan 2025.
J) Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.	The Architectural Design Statement, prepared by O'Mahony Pike Architects and Landscape Design Statement, prepared by Brady Shipman Martin Built Environment Consultants demonstrate that the development has been designed to respond appropriately to adjoining lands. In particular, the existing dwelling to the west of the site is buffered by the proposed internal distributor road and landscaped verge, ensuring appropriate separation distances and protecting existing residential amenity.
At Site/Building Scale	Applicant's Response
A) Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.	The Architectural Design Statement, prepared by O'Mahony Pike Architects, and Daylight & Sunlight Assessment, prepared by Model Works, demonstrate that the proposed layout, orientation and building design maximise daylight, natural ventilation and outlook while minimising overshadowing.
B) Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2 nd Edition).	A Daylight & Sunlight Assessment has been prepared by Model Works, demonstrating that the proposed development has been assessed against the relevant BRE guidance and achieves an appropriate standard of residential amenity.
C) Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.	The proposed layout has been designed to achieve appropriate separation distances, building orientation and landscape buffers. The Daylight & Sunlight Assessment, prepared by Model Works confirms that the proposal will not result in significant adverse impacts on neighbouring properties.
D) Proposal should not negatively impact on Architectural Conservation Area (AC) or the setting of a protected structure.	The Architectural Heritage Impact Assessment, prepared by Irish Archaeological Consultancy Ltd, confirms that the proposed development has been designed to respect the setting of nearby protected structures and heritage assets, with no significant adverse impacts identified
E) Proposals must demonstrate regard to the relative energy cost of and expected embodied and operational carbon emissions over the lifetime of the development. Proposals must demonstrate	An Energy Efficiency and Climate Change Adaptation Design Statement, prepared by Delap and Waller, demonstrates that the proposal incorporates energy-efficient design measures and supports the climate action objectives of national, regional and local planning policy.

maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of and expected embodied carbon emissions over the lifetime of the development.	
County Specific Criteria	Applicant's Response
A) Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and / or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.	Not applicable. The application site is not located within the coastal corridor identified in Section 8.5 of the Development Plan.
B) Having regard to the high quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.	A Landscape and Visual Impact Assessment prepared by Model Works, demonstrates that the proposed development responds appropriately to the site's landscape setting and will not give rise to unacceptable visual impacts.
C) Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning's stage).	The proposal has been informed by the pre-application consultation process, including the LRD Opinion issued by Dún Laoghaire-Rathdown County Council.
D) Specific assessments such as assessment of microclimatic impacts such as down draft.	A Wind Microclimate Assessment has been prepared by Integrated Environmental Solutions, and demonstrates that the proposed development provides a comfortable pedestrian environment.
E) Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.	An Ecological Impact Assessment and Natura Impact Statement have been prepared by Brady Shipman Martin Built Environment Consultants, assessing potential ecological effects, including impacts on protected habitats and species.

F) Assessment that the proposal allows for the retention of telecommunications channels, such as microwave links.	The proposal does not interfere with known telecommunications infrastructure or microwave links. We refer to the Telecoms report, prepared by Delap & Waller.
G) An assessment that the proposal maintains safe air navigation.	The proposal does not adversely affect aviation safeguarding requirements.
H) Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required). AA and Ecological Impact Assessment, as appropriate.	The application is accompanied by the required Environmental Impact Assessment Screening Report, prepared by Stephen Little and Associates, Appropriate Assessment Screening Report and Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants, demonstrating that the proposal can proceed without significant adverse environmental effects.
I) Additional criteria for larger redevelopment sites with taller buildings.	The Architectural Design Statement, prepared by O'Mahony Pike Architects demonstrates that the proposal has been designed as a comprehensive, plan-led development consistent with the Old Connaught Local Area Plan 2025.
J) Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.	The proposal delivers a high-quality, mixed-tenure residential neighbourhood incorporating new streets, public open spaces, community infrastructure and strategic movement connections, creating a distinctive and sustainable place.
K) For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.	Compliance with the relevant BRE guidance is demonstrated within the accompanying Daylight & Sunlight Assessment, prepared by Model Works.

Table 1: Response to Table 5.1 of Appendix 5 of the County Development Plan 2022-2028

Housing Mix

"As per current proposals, evidence to demonstrate that the unit mix proposed is generally in accordance with Policy OCLAP19 – Residential Mix of the Old Connaught LAP."

Applicant's Response

Policy OCLAP19 'Residential Mix' of the LAP states:

'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'

Policy PHP27 of the DLR County Development Plan 2022-2028 states:

'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.'

Of note, supporting text within the CDP notes all residential development should include apartment developments, which the proposed development provides for. 4no. apartment blocks are proposed, accommodating 162no. apartments (and 6no. duplex units). This represents c.60% of the residential mix within the proposed scheme.

The proposed scheme avoids monoculture development and features a range of tenure types to accommodate the needs of a mixed and balanced community.

We refer the Planning Authority to the **Schedule of Accommodation and Housing Quality Assessment**, prepared by O'Mahony Pike Architects for detailed breakdown in respect to the proposed developments residential unit mix across both houses and apartments:

- 24004-OMP-XX-B1-SH-A-6002
- 24004-OMP-XX-B3-SH-A-6003
- 24004-OMP-XX-B3-SH-A-6004
- 24004-OMP-ZZ-ZZ-SA-A-6000

We note, the proposed development provides for a mixture of houses, duplexes and apartments and complies with the Design Standards for Apartments (2025) and policy OCLAP19 – Residential Mix of the Old Connaught Local Area plan.

We note for the Planning Authority's convenience, a summary of the proposed development unit mix is outlined below:

Typology	No. of units	Percentage
1 Bed Apartment	49	18.1%
2 Bed Apartment (3 Persons)	35	13%
2 Bed Apartment (4 Persons)	78	29%
3 Bed Duplex (5 Persons)	6	2.2%
2 Bed Houses (4 persons)	13	4.8%
3 Bed Houses (5 Person)	68	25.1%
4 Bed Houses (7 Person)	22	8.12%
Total	271	100%

Table 2: Housing mix of the proposed development

As noted above, a range of unit types and sizes are provided for, which allow for up and downsizing from 1 bedroom apartments to larger 3 and 4 bedroom houses, within the same local community.

The proposed housing mix incorporates a variety and choice of housing units by type and size so as to meet the differing household need in the County per section 12.3.3.1 of the County Development Plan.

Design and Layout

“The subject LRD scheme will set an important precedent for development in the Old Connaught LAP area.

The Planning Authority has the following concerns in relation to the design and layout:

- *Strong building frontages/ urban edge required along the primary north-south street, particularly the provision of articulation/design features at important corner sites such as north-east corner of Block 3.*
- *Quality of balconies at Blocks 1 and 2 close to the Luas and potential impact on residential amenity in terms of noise.*
- *Design at ground floor of apartment blocks to ensure activity on/interaction with street, particular west façade of Blocks 1/2. Particular consideration will be required for ground and first floor units in the proximity of the LUAS line.*
- *Details of how proposed design achieves a strong sense of place with a village feel.”*

[Emphasis added by SLA]

Applicant’s Response

We provide the following response to each point noted above as follows:

Building frontages / urban edge along primary north-south street

The proposed scheme provides strong building frontages along the primary north-south street, with Blocks 1 & 2 and Block 3 bookending the street at its northern and southern ends respectively. The streetscape in between these bookends is characterised by tall, 3 storey gable fronted houses, which create a strong urban streetscape. A warm, buff coloured brick is the dominant material on the street, creating a unified streetscape.

Block 3, at the northern end of the street, is distinguished by the use of a lighter brick, highlighting the importance of this building which will aid placemaking at this prominent corner in short and medium public views.



Figure 5: Extract from OMP (Dwg. No. 24004-OMP-B3-ZZ-DR-A-2000), shows Block 3 as proposed. Note materiality to distinguish this prominent corner and positive response to way and place making.

Quality of balconies and potential impact on residential amenity in terms of noise

We note that the balconies of Blocks 1 & 2 will be a high quality, prefabricated system, in a RAL colour that matches the proposed windows in the scheme. On the western side of Blocks 1 & 2, there is a landscape area around the ground floor units of c. 2.5m depth, a 2m footpath and a 1m planted hedge. The distance from the outer (western) side of the proposed balconies to the edge of the Luas Reservation is c. 3.8m.

Additionally, we refer the Planning Authority to the **Noise Assessment prepared by Traynor Environmental** submitted as part of this planning application for further detail which takes into account the LUAS reservation corridor and other transport related noises. With this specific regard, the noise assessment concludes:

*“The proposed development is located adjacent to lands reserved for the N11/M11 Junction 4 to Junction 14 Improvement Scheme and within proximity to the Indicative Luas Reservation identified within the planning framework for the area. While detailed operational information relating to future transport infrastructure is not currently available, **the façade sound insulation and ventilation strategy has been developed using a robust and precautionary approach. The recommended building envelope specifications provide resilience against potential future changes in transportation noise levels and ensure that acceptable internal acoustic conditions can be achieved.**”*

Design at ground floor of apartment blocks

Careful consideration has been given to the design of the ground floor of the all apartment blocks. Ground floor residential units are provided, ensuring passive supervision of the street. Building entrances to the main stairs & lifts are placed in prominent positions and demarcated by recessed entrances with staggered brick detailing.

Service areas are generally located in less prominent positions, such as within recessed areas or within secondary building forms, and some landscaping is provided to soften their impact. Please refer to the **Design Statement prepared by O’Mahony Pike Architects** for further detail.

As can be seen in figure 6 in addition to the LUAS reservation corridor (shown in light green) an additional buffer area is shown in dark green and footpaths followed by privacy strips along the ground floor outdoor amenities spaces on the western façade. These have been carefully designed to ensure sufficient passive surveillance takes place along the street, whilst producing high quality amenities spaces for future occupiers to enjoy.

Ground-floor terraces are designed with direct gated access to the footpath, promoting interactions between residents and the public footpath.

Pending the future delivery of the LUAS scheme it is envisioned the corridor will; be used as a ‘meanwhile use’ green space and desire paths have be included to facilitate this temporary use.



Figure 6: Extract from Proposed Site Layout drawing 24004-OMP-00-SP-DR-A-1000 showing the relationship and interactions between Blocks 1/2 and LUAS reservation corridor prepared by O'Mahony Pike Architects.

Design achieves a strong sense of place with a Village feel

We note from Chapter 5 that the Old Connaught Local Area Plan seeks to create a sustainable urban village feel.

The proposed scheme will create a strong sense of place, with a high quality architectural & landscape environment. The retention of the existing trees in both of the proposed public open spaces including the veteran oak in the north of the site, will create a sense of place, in a similar way to the existing mature tree at the junction of Old Connaught Avenue and Thornhill Road.

The prominent gable fronted houses, the variation in building scale and the extensive use of brickwork throughout the scheme will create a village feel and a strong character. New buildings will be incorporated with soft landscaping across the site with only trees of the lower quality removed in order to make new vehicular and pedestrian connections across the lands.

We additionally refer the Planning Authority to the **Landscape Visual Impact Assessment and CGIs prepared by ModelWorks** submitted as part of this planning application for further detail.

- (i) *“A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views/photomontages, including winter views, that would assist in understanding the relationship between the proposed development and its context.”*

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to the following **Plans, Elevations and Contiguous Elevations prepared by O’Mahony Pike Architects**: -

- Block 1 & 2 Ground Floor Plan (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1000)
- Block 1 & 2 Level 01 Plan (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1001)
- Block 1 & 2 Level 02 Plan (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1002)
- Block 1 & 2 Level 03 Plan (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1003)
- Block 1 & 2 Level 04 Plan (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1004)
- Block 1 & 2 Roof Plan (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1005)
- Block 1 & 2 Elevations and Sections (Dwg. No. 24004-OMP-B1&B2-ZZ-DR-A-1006)
- Block 3 Ground Floor & Level 01 Plan (Dwg. No. 24004-OMP-B3-ZZ-DR-A-1000)
- Block 3 Level 02 & 03 Plan (Dwg. No. 24004-OMP-B3-ZZ-DR-A-1001)
- Block 3 Level 04 & Roof Plan (Dwg. No. 24004-OMP-B3-ZZ-DR-A-1002)
- Block 3 Elevations & Section (Dwg. No. 24004-OMP-B3-ZZ-DR-A-2000)
- Block 4 Ground Floor & Level 01 Plan (Dwg. No. 24004-OMP-B4-ZZ-DR-A-1000)
- Block 4 Level 02 & 03 Plan (Dwg. No. 24004-OMP-B4-ZZ-DR-A-1001)
- Block 4 Roof Plan (Dwg. No. 24004-OMP-B4-ZZ-DR-A-1003)
- Block 4 Elevations & Section (Dwg. No. 24004-OMP-B4-ZZ-DR-A-2000)

We refer the Planning Authority to the enclosed drawing schedule, prepared by O’Mahony Pike Architects for full list of drawings.

We refer the Planning Authority to the **Landscape Visual Impact Statement and Photomontages prepared by ModelWorks**. These plans and particulars shows the proposed development aligns and enhances the surrounding built environment and context including sections taken from an array of locations across the site along the main throughfare. Verified photomontages are also included which were taken in early 2026 showing the winter views as can be observed by existing trees. This ensures the proper and sustainable development of the Old Connaught LAP lands and its surrounding context.



Figure 7: CGI of the proposed site, prepared by Modelworks

Housing Quality Assessment

*“A **Housing Quality Assessment** which provides the specific information regarding the proposed unit typologies required by the Dún Laoghaire Rathdown County Development Plan 2022-2028 and the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025) and Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).”*

[Emphasis added by SLA]

Applicant's Response

We refer to the enclosed **Housing Quality Assessments prepared by O'Mahony Pike Architects** for details of the proposed unit typologies which address the above. The following HQA's pertain to the apartment unit typologies which have been designed in accordance with the 2025 Apartment Guidelines:

- HQA 24004-OMP-XX-B4-SH-A-6002 (Block 1)
- HQA 24004-OMP-XX-B4-SH-A-6004 (Block 2 – duplexes)
- HQA 24004-OMP-XX-B4-SH-A-6003 (Block 3)
- HQA 24004-OMP-XX-B4-SH-A-6004 (Block 4)

HQA 24004-OMP-XX-XX-SH-A-6001 addresses the housing unit types with full regard to the 2007 and 2024 section 28 guidelines.

Storage

“Internal storage not provided in line with minimum requirements of County Development Plan 2022-2028 for the following unit types:

- A1B1,
- A2B1
- A2C1.1
- A2I1.1
- A2B1.1
- D3A

Details of the bulky storage provision for each individual apartment block required having regard for Section 12.3.5.3 Internal Storage and External Storage of the Dún Laoghaire Rathdown County Development Plan 2022-2028...”

[Emphasis added by SLA]

Applicant's Response

We refer to the enclosed Architectural Design Statement and Housing Quality Assessment, prepared by O'Mahony Pike Architects for details of Internal Storage and the bulky storage provision for each individual apartment block. This includes the above outlined unit types: A1B1, A2B1, A2C1.1, A2I1.1, A2B1.1 and D3A.

Proposed storage has regard to Section 12.3.5.3 Internal Storage and External Storage of the Dún Laoghaire Rathdown County Development Plan 2022-2028.. Storage areas vary in size from 3-9sq/m, all of which have either been met or exceeded.

Additionally, we refer the Planning Authority to the following drawings which show both internal and bulky storage areas across the apartment blocks:

- 24004-OMP-B1&B2-ZZ-DR-A-1000
- 24004-OMP-B1&B2-ZZ-DR-A-1001
- 24004-OMP-B1&B2-ZZ-DR-A-1002
- 24004-OMP-B1&B2-ZZ-DR-A-1004

- 24004-OMP-B3 -ZZ-DR-A-1000
- 24004-OMP-B3 -ZZ-DR-A-1001
- 24004-OMP-B3 -ZZ-DR-A-1002



Figure 8: Extract from Architectural drawing showing typical location of bulky storage in Apartment Block 1 (highlighted in red)

Internal storage for all units is in compliance with the 2025 Design Standards for Apartments. Provision has been made for a bulky goods store within each apartment block, please refer to architectural drawings prepared by O'Mahony Pike Architects for further detail.

3.3 Drainage

"A Report that addresses the concerns of the Drainage Planning Department will be required (full report appended). The Planning Authority have considered the commentary provided by the Drainage Planning Department and concur with the recommendations made.

Submitted details at LRD Stage 3 application stage should be based on Site Investigations being undertaken.

In terms of Foul Drainage & Water Supply, a Confirmation of Feasibility from Uisce Éireann should be dated within 6 months of the application date. It is noted that Uisce Éireann have confirmed in their response that a water connection is feasible without infrastructure upgrade by Uisce Éireann. However, as discussed above wastewater connection is only feasible subject to upgrades TBC."

Applicant's Response

The Uisce Éireann **Confirmation of Feasibility**, dated 18 February 2026, was submitted at pre-planning consultation stage and also accompanies this application. The CoF is located in Appendix B of the Engineering Planning Report prepared by AtkinsRealis. Furthermore, the Uisce Éireann

Statement of Design Acceptance dated 21 July 2026 is located in Appendix E of the Engineering Planning Report prepared by AtkinsRealis.

Additionally, we refer the Planning Authority to the **Stormwater Impact Assessment Report** prepared by AtkinsRealis which includes a Stage 1 Storm Water Audit. Full details of the site investigation report are also included within the Storm Water Impact Assessment report and findings taken account of within the Storm Drainage Design.

Additionally, we refer the Planning Authority to the **Foul Pump Station and Rising Main Report and associated drawings** prepared by AtkinsRealis. This provides a permanent design solution Foul drainage discharge to the existing public network.

Finally, we note the below responses to the Drainage Planning Department report as included in the opinion, with responses provided by the project designers:

Drainage Planning Comment:	Atkins Response:
Section 10.4 of the Old Connaught LAP 2025 confirms that “New developments in the area should maximise the provision of SuDS features and must be self-attenuated. In general, private developments should look to implement a surface water management strategy that provides a multi-level treatment as possible. This should include a combination of SuDS features such as green/blue roofs, rainwater harvesting, rain gardens, permeable paving etc.” The applicant has not proposed any attenuation within Phase 1 with reliance on the regional attenuation pond. This is not in line with the Local Area Plan. The applicant is requested to review the proposals and provide a system in line with the requirements of the Local Area Plan, with particular reference to the provision of site attenuation.	The Design has been amended in consultation with DLRCC to include localised attenuation within phase A1 as indicated on drawings ATK-ZZ-ZZ-DR-CE-900501 and 502. Attenuation is provided within multiple SuDS feature and modular underground attenuation systems prior to controlled discharged to the regional attenuation pond.
In Section 7 of Storm Water Impact Assessment the applicant has set out a number of catchments, allowable outflows, attenuation volume proposals, with the area increasing in the various scenarios. The applicant is requested to provide a drawing of the proposed areas, setting out clearly the areas under the applicants control and how these figures relate to the overall development of the LAP areas with particular reference to the catchment for the regional pond.	Refer to drawing ATK-ZZ-ZZ-DR-CE-900103 for sub catchment areas under the control of the applicant. The AtkinsRéalís Storm Water Impact Assessment Report (0126446DG0009) also outlines the overall requirement for the regional attenuation ponds in terms of volumes based on current information available at the date of the planning application. Note that the this planning application only applies for a storage volume required under the proposed development extents within the application
The applicant has set out an allowable outflow figure based on a catchment of both Phase 1 and Phase 2. As noted above, this is not agreed until such time as the site investigation is complete and used in the calculations. The Applicant is requested to provide a catchment map of Phase 1 and Phase 2, clearly identifying the positively drained areas that are	Noted, the Site Investigations were completed prior to the planning application being submitted. Refer to the AtkinsRéalís Storm Water Impact Assessment Report (0126446DG0009) for further information on the results of Site Investigation and associated

included in the calculation. It is noted that only positively drained areas should be included in the calculation.	calculations for soil types. Further discussion to place between AtkinsRéalis and DLRCC on finding of the SI report and soil type classification prior to submission of this planning application. Refer to drawing ATK-ZZ-ZZ-DR-CE-900103 for sub catchment areas under the control of the applicant.
The applicant has set out an allowable outflow figure based on a catchment of both Phase 1 and Phase 2. As noted above, this is not agreed until such time as the site investigation is complete and used in the calculations. The Applicant is requested to provide a catchment map of Phase 1 and Phase 2, clearly identifying the positively drained areas that are included in the calculation. It is noted that only positively drained areas should be included in the calculation.	As per item 3 above.
As standard, in accordance with Appendix 7.2: Green Roof Policy of the County Development Plan 2022-2028, the applicant should demonstrate which areas of the development will have green roofs and should demonstrate by calculation and by representation on a drawing that the proposed green roof extents are in accordance with the Council's Green Roof Policy such that the minimum coverage requirement is achieved. The applicant should also provide details of maintenance access to the green roofs and should note that, in the absence of a stairwell type access to the roof, provision should be made for alternative maintenance and access arrangements such as external mobile access that will be centrally managed. A detailed cross section of the proposed build-up of the green roof should be provided, including dimensions. The applicant should demonstrate that the green roof is designed in accordance with BS EN 12056-3:2000, BS 6229:2018 and The SUDS Manual (CIRIA C753).	Please refer to AtkinsRéalis drawing ATK-ZZ-ZZ-DR-CE-900504 for proposed green roof drawings in coordination with the project Architects. The drawing provides information on the total area of green roof and standard detail on the access to the roof for maintenance.
The applicant is requested to ensure that all surface water design proposals are in accordance with the requirements of Appendix 7: Sustainable Drainage System Measures of the County Development Plan 2022-2028.	Noted
The applicant is requested to ensure that the proposed surface water design is in accordance with County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EI4: Sustainable Drainage Systems, such that the proposal meets the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS). The design must incorporate SuDS measures appropriate to the scale of the proposed development such as green roofs, bioretention areas, permeable paving, rainwater harvesting, swales, etc. that minimize flows to the public drainage system and maximizes local infiltration potential.	Design has been carried out in accordance with the County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EI4: Sustainable Drainage Systems, such that the proposal meets the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies including appropriate SuDS measures.

A nature-based solution to the drainage requirements is encouraged, with limited below ground tanks proposed. The applicant is encouraged to consider bioretention area, detention basin, tree pits, rain gardens, rainwater harvesting, filter drains, swales etc. throughout the development.	Refer to drawings layout drawings ATK-ZZ-ZZ-DR-CE-900501 and 502 and associated details drawings to proposed used of SuDS throughout the development.
If an attenuation system is proposed it should, where possible, not be located under the internal roads but under a communal open area or parking. Attenuation systems should be inline. The preference is for attenuation systems that allow for infiltration and/or treatment within the site. The applicant should note that certain landscaping items, such as trees, may not be compatible with attenuation systems. The applicant should specify whether the proposed development will be taken in charge or privately managed and provide the details of the management company that will maintain the proposed surface water drainage network as required.	Where possible attenuation system have been located in areas classified as Open Space. All attenuation systems have been designed to be inline in accordance with DLRCC requirements. Some small trees may be located above underground attenuation system and it is confirmed by the supplier that such tree are acceptable in mounded areas above the attenuation system. This approach has also been accepted on other developments within the DLRCC area. Please refer to OMP Architects drawings for taken in charge proposals.
The applicant is requested to submit supporting standard details, including cross-sections and long-sections, and commentary that demonstrates that all proposed SuDS measures have been designed in accordance with the recommendations of CIRIA C753 (The SuDS manual) and current best practice.	Refer to AtkinsRéalis drawings ATK-ZZ-ZZ-DR-CE-909001 - 9008 for standard construction details including SuDS and regional attenuation pond
As standard, the applicant is requested to provide a penstock in the flow control device chamber and ensure that the flow control device provided does not have an overflow. The applicant shall also clarify whether a silt trap is being provided in the flow control device chamber and if not to make provision for same.	Silt trap manholes will be provided upstream of underground modular attenuation systems prior to downstream flow control devices. The vortex flow control device manhole will have a sump within it but this is typically to allow for the installation devise and does not provided protection from silts entering into the attenuation system, therefore silt trap will be installed prior to the attenuation system.
The applicant is requested to submit the complete Site Investigation Report and results, including Infiltration tests, and a plan showing the trial pits/soak away test locations across the site. The report should address instances where groundwater, if any, was encountered during testing and its impact	Please refer to AtkinsRéalis Storm Water Impact Assessment Report (0126446DG0009) for further information on the results of Site Investigation results. Infiltration testing was carried out as part of the SI works with full results / findings indicated.
If the applicant proposes SuDS measures that incorporate the use of infiltration, the applicant is requested to provide	Please refer to AtkinsRéalis drawing ATK-ZZ-ZZ-DR-CE-909008 for detail of the underground modular

details of each SuDS measure and confirm whether it will be lined/tanked or not. If lined/tanked systems are to be used, then the applicant will be requested to explain the rationale behind this. If unlined systems are to be used then the applicant is requested to demonstrate on a drawing that all infiltration SuDS proposals, including the attenuation system, have a 5m separation distance from building foundations and 3m separation from site boundaries.	attenuation system. It is noted that the system will be lined based on no infiltration as it is within soil type 4. The system will be designed at detail design stage with uplift calculations completed to determine no impact from ground water.
As standard, the applicant is requested to show the options being proposed for interception and treatment with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GDSDS requirements. The applicant should note that over-provision in one location does not compensate for under provision elsewhere. Sufficient use of SuDS features should remove the need for a petrol interceptor.	Please refer to AtkinsRéalis Storm Water Impact Assessment Report (0126446DG0009) for calculations to demonstrate development is in accordance with the GDSDS. Note that no Petrol interceptor has been proposed for this site due to the used of SuDS, silt traps and the regional attenuation pond
The applicant is requested to ensure that a Stage 1 Stormwater Audit is carried out for the development. In accordance with the Stormwater Audit policy, the audit shall be forwarded to DLRCC prior to lodging the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.	Please refer to AtkinsRéalis Storm Water Impact Assessment Report (0126446DG0009) for a copy of the Stage 1 Stormwater Audit carried out by Punch Consulting Engineering. Note that a copy of the Audit will also be issued directly to DLRCC as part of the Audit process.
As standard, a Flood Risk Assessment will be required for the site.	A FRA has been provided.
While a blockage analysis has been provided, a revised analysis will be required when up to date SI information has been received. The applicant is requested to comment on the proposed surface water drainage system in the event of blockage or partial blockage of the system, commenting on any surcharging or flood risk that may be identified. The applicant is requested to submit a drawing identifying and showing details of safe overland flow routes both within and without the site. The overland flow route plan should identify drop kerbs or ramps requested for channelling the flow, should address low point areas in the site and should detail how properties, both within the development and on adjacent lands, will be protected in the event of excessive overland flows.	A Blockage Analysis has been carried out as part of the planning application following receipt of the Site Investigation Report. Please refer to drawing ATK-ZZ-ZZ-DR-CE-900505 for Flood Flow Paths.
As the foul water and water supply networks are Uisce Éireann owned assets, the proposer should contact Uisce Éireann to discuss any issues regarding the impact of the proposed development on their assets. The preconnection enquiry response (ie. Confirmation of Feasibility) should be dated within 6 months of the application date.	Noted. A CoF was received from Uisce Éireann within 6 month of lodgement of this planning application and SoDA also accompanies the application.

3.4 Transportation

“See appended full Report from DLR Transportation Department. Detailed reports should be submitted in relation to the following items:

- *Travel Plan*
- *Traffic Impact Assessment, demonstrating suitability of the proposed carriageway and junction design.*
- *Quality Audit (including Road Safety Audit & DMURS audit)*
- *Construction Management Plan including construction phase traffic management plan*
- *Cycle Audit (See Section 12.4.6.1 Paragraph 2 of the current County Development Plan).”*

[Emphasis added by SLA]

Applicant’s Response

In the first instance, we refer the Planning Authority to the **Response to Stage 2 LRD Opinion (Transport)** prepared by AtkinsRealis which responds in full to this Opinion item including the appended report from DLR Transportation Department.

We refer to the enclosed **Mobility Management Plan** prepared by AtkinsRealis, which promotes active and sustainable travel modes. The proposed development has been designed in accordance with DMURS principles, ensuring the layout supports active travel and reduces the reliance on private cars.

We refer to the enclosed **Traffic and Transport Assessment** prepared by AtkinsRealis for details regarding suitability of the proposed carriageway and junction design. The proposed carriageway and junction design are in accordance with the DMURS standards, CDM TL302 general arrangement for transition of segregated cycle facilities. Due to proposed parking spaces on the western side of the North-south link street, all five junctions on the western side of North-South link street are designed in accordance with CDM TL401 Standard Cycle Track Crossing Side road full set back while the other junctions are designed in accordance with TL403 standard cycle track crossing side road with priority no set back. The latter design was design was developed to take into account of potential future LUAS alignment.

We refer to the enclosed **Quality Audit**, prepared by AtkinsRéalís Consulting Engineers. This considered the proposed access arrangements, pedestrian and cyclist facilities, site circulation, vehicle movements, visibility requirements and the overall interaction of all road users within the development and its surrounding road network.

We refer to Section 5.13 of the enclosed **Traffic and Transport Assessment**, prepared by AtkinsRéalís Consulting Engineers. The proposed development compiles with the DLR Cycle Parking Assessment Criteria by providing secure, accessible long-stay and short-stay cycle parking, including spaces for cargo bikes, together with supporting facilities including covered parking. The internal cycle network connects with the Old Connaught LAP cycle network and the BusConnects Dublin-Bray corridor, supporting sustainable travel and aligning with the objectives of the Old Connaught LAP.

We refer to the **Outline Construction Traffic Management Plan** has been prepared to ensure the safe management of construction traffic. Construction traffic will use the strategic road network (R761/M11), and peak traffic is expected to have a negligible impact on the surrounding road network. Mitigation measures including controlled site access, signage, staff parking controls, stakeholder engagement and delivery management to minimise disruption during construction.

Cycle Parking

“Cycle parking provision should clearly demonstrate compliance with the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) for long and short stay parking.

Provision for cargo bikes may be provided as standard “Sheffield” type stands. Rear access routes to houses should be widened in order to allow cargo bikes to be stored in rear gardens.”

[Emphasis added by SLA]

Applicant's Response

Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) state under SPPR4 that a range of safe and secure cycle storage facilities should be provided for.

SPPR 4 states:

'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) *(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.'*

We refer the planning Authority to the enclosed **Architectural Design Statement and Schedule of Accommodations, prepared by O'Mahony Pike Architects** for details of the proposed cycle parking provision. Additionally, we refer the Planning Authority to the **Traffic and Transport Assessment prepared by AtkinsRealis**.

BICYCLE PARKING RESIDENTIAL UNITS	No. Residential Units	No. of Bedrooms	Residential Bicycle Parking Requirement (Apt Guidelines)	Residential Bicycle Parking Proposed	Visitor Bicycle Parking Requirement (Apt Guidelines)*	Visitor Bicycle Parking Proposed (External Sheffield Stands)	Total Residential and Visitor Bicycle Parking Requirement (Apt Guidelines)	Total Bicycle Parking Provision	Motor bicycle Parking Proposed
Apartment Block 1 (East)	54	95	95	88	27	24	122	112	3
Apartment Block 2 (East)	41	73	73	80	21	24	94	104	
Apartment Block 3 (Central)	38	63	63	67	19	18	82	85	
Apartment Block 4 (Central)	35	62	62	68	18	18	80	86	
Mid-terrace houses	45			48				48	
TOTALS	168	293	293	351	84	84	377	435	3

RESIDENTIAL BICYCLE PARKING TYPE APARTMENTS & DUPLEXES	No. Sheffield Stand Spaces in Internal Bicycle Stores	No. Semi-Vertical Spaces in Internal Bicycle Stores	No. Stacked Spaces in Internal Bicycle Stores	No. Cargo Spaces	No. External Bicycle Locker Spaces (Horizontal)	No. Sheffield Stand Spaces in External Bicycle Stores	No. External Bicycle Store Spaces (Stacked)	No. External Bicycle Store Spaces (Vertical)	Total Residential Bicycle Parking
Apartment Block 1 (East)	52		32	4					88
Apartment Block 2 (East)	44		32	4					80
Apartment Block 3 (Central)	36	28		3					67
Apartment Block 4 (Central)	16	20		4		28			68
TOTALS	148	48	64	15		28			303
	48.8%	15.8%	21.1%	5.0%		9.2%			100.0%

Figure 9: Extract Schedule of Accommodation, prepared by O'Mahony Pike Architects.

In respect to the apartment/duplex cycle parking is provided at 1 space per bedroom, in accordance with the 2024 Compact Settlement Guidelines. This includes 1 Sheffield stand space per apartment/duplex, in line with the DLRCC Development Plan, with additional provision through stacked, semi-vertical spaces and bicycle lockers. Visitor parking is provided in Sheffield stands, with approximately 5% of residential spaces allocated for cargo bicycles.

For house cycle parking, dwellings with side or rear access to private rear gardens are expected to accommodate bicycle storage within those gardens. As can be observed on housing plans, a number of homes afford future residents the benefit of **direct external access** to their respective rear gardens, allowing for the safe storage of bikes. Following feedback at the pre-planning meeting, corners in the

units have been enlarged and/or chamfered to allow larger bikes and less able cyclists to easily move bikes more easily.

The larger three-storey houses generally include rear laneway access, enabling external access for bin and bicycle storage. For mid-terrace houses without external garden access, bicycle parking is provided in accordance with DLRCC Development Plan standards at one space per dwelling. Where garden access is only available through the internal ground floor, secure bicycle parking is provided within the streetscape close to the dwelling.

Please refer to **Drawing No. 24004-OMP-01-00-DR-A-5000 entitled proposed Bin Stores, Substations and Bike Stores, prepared by O'Mahony Pike Architects**. This includes a location plan of a number of satellite bike stores across the development which has been dispersed to reduce travel times between individual houses and secure bike stores.

Car Parking

"Proposed parking ratio (1:1.22) is noted, however, the Applicant shall also demonstrate proposed measures to reduce reliance on private motor vehicles for residents of the proposed development."

Applicant's Response

We refer the Planning Authority to the **Traffic and Transport Assessment prepared by AtkinsRéalis** for a detailed breakdown of car parking provision and ratios. The proposed development adopts a planned, multimodal transport strategy that integrates walking and cycling infrastructure, public transport accessibility and road network improvements. This approach aligns with national and regional planning policy by prioritising sustainable mobility, reducing reliance on private cars and supporting compact growth. The scheme also delivers key enabling infrastructure, including link roads, active travel routes and public transport corridors, to support long-term sustainable travel behaviour and encourage modal shift.

Additionally, we refer the Planning Authority to the Car Parking Plan drawing, prepared by O'Mahony Pike Architects and **Mobility Management Plan prepared by AtkinsRéalis** which contains information to reduce reliance on private motors. As part of this plan ongoing monitoring and review will take place to ensure the MMP continues to deliver on its objective and targets in a range of targeted actions from providing new residents with cycle route information to monitoring of car-share schemes.

A number of online bus stops are included along the North-South link road which prioritise public transport along with the 7m LUAS reservation corridor. A number of 'Go-car' spaces are also located centrally within the site, which in turn will reduce private motor dependency.

Site Layout & Connectivity

A Report/ full suite of documents that addresses the concerns of the Transportation Planning Department will be required (see Appendix C). This should be read in conjunction with the Reports submitted by TII and the NTA which are summarised below. The Planning Authority have considered the commentary provided by the Transportation Planning Department and concur with the recommendations made. Of particular note is:

- All user access should be provided to the south-eastern (DLR owned) site to reduce the potential for crossings across the LUAS reservation. As stated below, location to be informed by Tree Survey.
- Consider relocation of internal road within Eastern portion of lands in order to increase set back of proposed dwellings from M11 and to avoid interrupting public open space area which otherwise would be fragmented.
- Pedestrian/cyclist access should be provided to the south-west site, adjacent Festina Lente.
- Access to the Public Open Space should be revised from a northerly direction (Block 3) as the proposed arrangement is likely to result in the creation of a traffic hazard due to poor visibility between pedestrians and vehicles/car parking.
- Further details in relation to surface treatments, junctions and levels should be provided.

[Emphasis added by SLA]

Applicant's Response

We refer to the Response to **Stage 2 LRD Opinion (Transport)**, prepared by AtkinsRéalis Consulting Engineers. We note that this report should be read in conjunction with the following reports and drawings:

- Traffic and Transport Assessment
- Mobility Management Plan
- DMURS Statement
- Outline Construction Traffic Management Plan
- Engineering and Infrastructure drawings
- Site Layout, access and public realm drawings

The design team has considered the relocation of the internal road within the Eastern portion of the lands. However, having examined other options, we have concluded that the central position of the internal road is the preferred solution. We note that the LAP proposes access to both the eastern and western plots of DLR land from the primary north-south street, and that the LAP does not propose that vehicular access to the eastern plot of DLR land should be via the subject site. Accordingly, we have removed the proposal to provide a potential vehicular connection between the Eastern portion of the subject site and the DLR lands. This creates a single public open space along the southern site boundary of the subject site, and we have indicated an alignment for a future pedestrian and cycle connection to the DLR lands through this public open space. We note that we have provided increased landscaping along the eastern site boundary, which will allow for planting and an acoustic barrier. We have along removed one house in this area in order to better align the landscaping with the eastern boundary. The design of the public open space to the south of Block 3 has been modified to allow for the retention of the existing oak tree. The road layout and parking have been adjusted to facilitate this design change, and a clear crossing area, with landscape on both sides, has been incorporated into the revised layout. **Refer to the Response to Stage 2 LRD Opinion (Transport).**

Future Luas Provision

“The Applicant is requested to clarify adherence to NTA requirements in terms of corridor reservation widths and also address concerns raised in terms of design of car parking on the Homezone streets and proposed parallel car parking spaces on the west side of the primary north-south street which could preclude the delivery of future bus stop infrastructure.

Remove reference to LUAS stop locations which have not yet been determined by NTA.”

[Emphasis added by SLA]

Applicant’s Response

The proposed development, proposes a 7m wide Luas corridor on the eastern side of the proposed North-South link road.

As there is some uncertainty around the timing of the Luas delivery, we are proposing that the Luas Reservation could be landscaped to provide an additional green area, as an interim use.

The previously proposed LUAS stop location has been removed from the application plans.

We refer to the enclosed proposed **site layout drawing (Drawing No. 24004-OMP-00-SP-DR-A-1000), and Architectural Design statement, prepared by O’Mahony Pike Architects** and most specifically to the **Traffic and Transport Assessment (section 5.8 – Luas Corridor), prepared by AtkinsRealis** for details of the LUAS corridor reservation compliance with NTA’s reservation corridor requirements.

Future National Road Scheme

*“TII have submitted comments (appended to this Report) which set out a number of concerns, in particular the proximity of dwellings to the eastern boundary of the site and road reservation area for the N11/M11 Junction 4 to Junction 14 Improvement Scheme. The Applicant is requested to address these concerns and provide any required mitigation measures to ensure an adequate level of amenity for future residents based on the current context and future road proposals. These mitigation measures should be informed by appropriate assessments such as a **Noise Impact Assessment**.*

TII have also requested details of any proposals for the alterations to infrastructure and / or traffic arrangements within the TII Motorway Maintenance and Renewals Contract (MMaRC) Network Area A boundary.”

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to the **Traffic and Transport Assessment prepared by AtkinsRéalis** for details addressing the *N11/M11 Junction 4 to Junction 14 Improvement Scheme*. This should be read in conjunction with the drawings and particulars prepared by AtkinsRéalis and in particular:

- 100126446-ATK-XX-00-DR-CE-900104_P02 - Junctions And Visibility Splays Key Plan
- 100126446-ATK-XX-00-DR-CE-900105_P02 - Junction Dimensions Sheet 1
- 100126446-ATK-XX-00-DR-CE-900106_P02 - Junction Dimensions Sheet 2
- 100126446-ATK-XX-00-DR-CE-900107_P01 - Visibility Splays Sheet 1
- 100126446-ATK-XX-00-DR-CE-900108_P01 - Visibility Splays Sheet 2.

We refer to the Response to the LRD Opinion (Transport), prepared by AtkinsRéalis Consulting Engineers, which details that the LAP was developed in collaboration with TII, and the extent of the reservation land was agreed and defined within the LAP. On this basis, all elements of the proposed development are located outside the MMaRC boundary.

The layout has been revised to enhance the interface with the M11/N11 corridor. A 1.5 m-wide footpath, together with a substantial tree planting buffer on both sides, has been provided along the eastern edge of the development adjacent to the reservation corridor (refer to Figure 2-7). This landscaped buffer will contribute to visual screening and assist in mitigating noise impacts.

We refer the Planning Authority to the **Noise Impact Assessment prepared by Traynor Environmental Limited**, which addresses the observations submitted at LRD Stage 2 by Transport Infrastructure Ireland in relation to the *proximity of dwellings to the eastern boundary of the site and road reservation area for the N11/M11 Junction 4 to Junction 14 Improvement Scheme*. The Assessment notes in its Acoustic and Design Statement conclusion- section 5.1.8:

“The proposed development has adopted a Good Acoustic Design approach consistent with the principles of ProPG. Through site layout, building orientation, screening, façade design and ventilation measures, the development is capable of achieving an acceptable standard of internal and external acoustic amenity for future occupants. The assessment demonstrates compliance with the principles of ProPG, BS 8233:2014 and recognised acoustic best practice. Accordingly, the proposed development is considered acceptable from a noise and vibration perspective.”

Additionally, in alignment with the above outlined conclusion; the Baseline monitoring confirmed that the existing acoustic environment is principally influenced by road traffic from the N11/M11 corridor and surrounding road network. The assessment considered relevant daytime and night-time noise indicators, which informed the appraisal of both construction and operational phase effects.

The assessment concluded that temporary construction noise and vibration impacts could be effectively managed through Best Practicable Means, adherence to BS 5228, implementation of a Construction Environmental Management Plan (enclosed with this application) and the mitigation measures identified in the report. For the operational phase, the development incorporates Good Acoustic Design through site layout, building orientation, massing, façade design, ventilation strategy and the positioning of communal amenity areas. The recommended façade sound insulation and ventilation measures will allow the internal ambient noise criteria in BS 8233:2014 to be achieved within the residential units and childcare facility, without reliance on open windows at the most exposed façades.

Having regard to BS 8233:2014, ProPG, EPA guidance, the World Health Organisation Environmental Noise Guidelines, the Planning Authority’s LRD Opinion, TII submissions and relevant planning policy, the proposed development is considered capable of providing an acceptable residential and childcare acoustic environment. The assessment identifies areas of Low and Medium Noise Risk and confirms that suitable internal and external amenity conditions can be achieved. Accordingly, no significant adverse noise or vibration effects are predicted, and the development is acceptable from an environmental noise and vibration perspective.

3.5 Open Space Landscaping

Open Space Provision

“Evidence (including a colour-coded map) to demonstrate that the proposed development is in accordance with the standards for public, communal and private open space set out by the relevant provisions under the Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024) and the Sustainable Urban Housing: Design Standards for New Apartments (2025).

The information must include a quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc. having regard for the public / communal open space requirements set out in the Dún Laoghaire Rathdown County Development Plan 2022-2028.

The Applicant should address the concerns raised by the DLR Parks & Landscape Division, notably:

- *Potential for the access road in eastern section to be moved to the eastern side of the parcel of land along the M11 reservation which would free up the central area for public open space.*
- *Location of cars parking along boundary of main triangular open space area creating a disconnect/traffic hazard between it and the proposed residential to the north.*
- *Preference is to retain the veteran oak tree (no. 203) as part of this area of open space.”*

Applicant's Response

We refer the Planning Authority to Landscape the **Design Statement and Drawing No. (7245-BSM-00-ZZ-DR-L-301) entitled Landscape Masterplan Open Space Strategy, prepared by Brady Shipman Martin** for a detailed response and compliance with the public, communal and private open provisions of the 'Guidelines for Planning Authorities: Sustainable Residential Development and Compact Settlements (2024)' and the 'Sustainable Urban Housing: Design Standards for New Apartments (2025)'.



Figure 9: Extract of Landscaping masterplan which outlines total COS and POS. Additionally, the plan shows the retention of the Oak tree in the north of the site per the Opinion request.

Following further design iterations, the veteran oak tree will now be retained within the north western proposed public open space area POS2.

In line with figure 4.13 'Central Character Area – Vehicular Routes and Public Transport' of the Old Connaught Local Area Plan, vehicular access to lands immediately to the north of Old Connaught Avenue will be accessed from the proposed North/South link road within the application site.

A pedestrian access route has been provided to facilitate a future connection to the DLR lands to the south. Great efforts have been made to make this connection, so to avoid removal of existing healthy trees. The provision of a vehicular route is omitted to protect the existing treeline and given the presence of a badgers set within the DLR lands. A vehicular access at this point would also sever the southern POS1 area to the detriment of the quality of this amenity space.

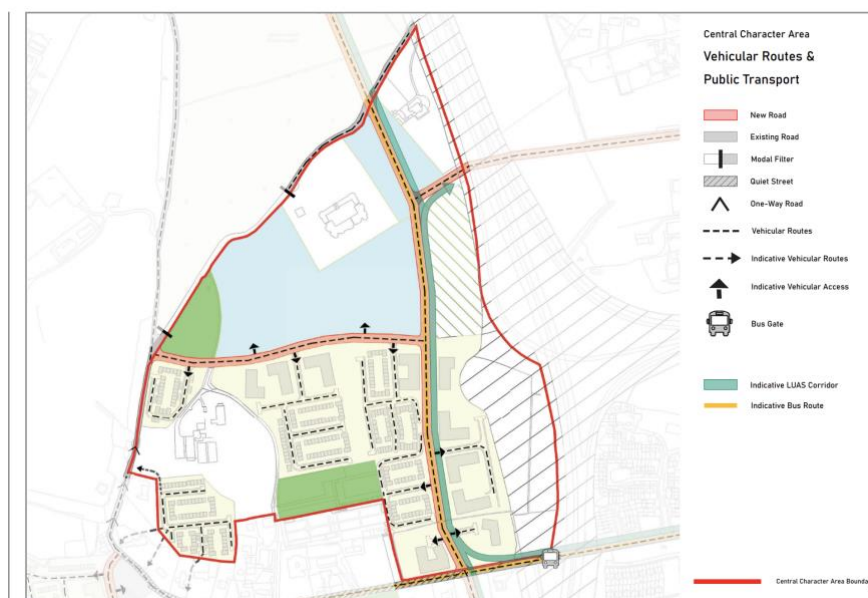


Figure 4.13: Central Character Area – Vehicular Routes and Public Transport

Figure 10: Figure 4.13 of the Old Connaught Local Area Plan

Communal open Space

“Full landscaping plans/visuals to be provided in relation to communal open spaces including boundary treatments, particularly the interface between the private amenity areas of the duplex units to communal open space.

*The Planning Authority has some concerns regarding the useability of the proposed roof terrace to Block 3. **A Wind Assessment should be provided**”*

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to the drawings and landscape design statement prepared by Brady Shipman Martin for details in relation to communal open space including boundary treatments, particularly the interface between private amenity areas of the duplex unit to the communal open space.

Further, we refer the planning Authority to the **Wind and Microclimate Assessment report, prepared by IES (Integrated Environmental Solutions)**, which generally concludes no mitigation is required. The sitting and standing comfort criteria are met in balcony, open space, roof level community open space and private amenities houses, addressing in full any concerns raised regarding the potential for wind to unduly impact the quality of residential amenity.

Private Amenity Space

“Proposed balconies are very open, therefore, it is recommended that a wind assessment be undertaken to ensure they are of adequate quality for future residents and/ or design mitigation be provided to increase shelter”

[Emphasis added by SLA]

Applicant’s Response

In the first instance, we refer the Planning Authority to the **Wind and Microclimate Assessment, prepared by IES** (Integrated Environmental Solutions Limited). The assessment concludes:

“The site shows the typical behaviour of any site in Dublin, with direct exposure to the southern-to-western arc of winds, which account for 80% of total winds. The landscape design and site layout result in the site performing well with respect to wind comfort. It was observed that,

- 1 The balconies of all blocks showed excellent results and fully met the requirements of the Sitting and Standing Comfort criteria.*
- 2 All communal Open spaces showed excellent results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 3 The community garden showed good results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 4 All public Open spaces showed excellent results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 5 The creche area of Block 3 showed excellent results and fully met the requirements of the Sitting and Standing Comfort Criteria.*
- 6 Overall results of the walking comfort show excellent compliance with Lawson’s Leisure Walking and Business Walking Comfort criteria.*
- 7 The Lawson’s Normal and Sensitive Pedestrian Safety Criteria are achieved throughout the Site.*

The site meets Lawson’s Standing and Sitting criteria when used together in most amenity spaces. It also meets Lawson’s Walking criteria requirements on all pathways.”

Retention of Veteran Oak Tree (no. 203)

“Retention of Veteran Oak Tree (no. 203) as part of any future development should be considered noting its historical/character value. Robust justification would be required for its removal/non-incorporation.

Any future link route between the subject site and the DLR plot to the south in the eastern parcel of land should be dictated by the quality of the existing, mature trees along the field boundary. The gap should be made where there is no trees or a tree of lower quality.”

[Emphasis added by SLA]

Applicant’s Response

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

The drawing confirms retention of Veteran Oak tree (no. 203), located with the open space south of Block 3, in north western POS2.

Additionally, the proposed scheme allows for a pedestrian/cyclist link from the southern POS to DLR owned lands, informed by the tree survey to ensure the retention and protection of healthy trees.

Landscaping

“The proposed primary north-south street lacks a strong soft landscape concept that will help to break up the vast and uninterrupted roadway and create a strong sense of character to reflect the local landscape. Less parking spaces and more tree cover & planting are required to prevent it becoming an inhospitable traffic corridor.

Boundary treatments should reflect rural character of area.”

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to **the landscape drawings, prepared by Brady Shipman Martin (refer to enclosed schedule)**. The proposed primary north-south street has been designed in accordance with the Old Connaught Local Area Plan 2025 and DMURS to create a high-quality streetscape. The design incorporates tree planting, soft landscaping, and SuDS features to enhance character and visual amenity.

On-street parking has been carefully balanced with landscaping to avoid the appearance of a traffic corridor. Boundary treatment incorporate native planting and concrete walls to reflect the rural character of the area and integrate the development into its surroundings.

3.6 Childcare Facility

“The Planning Authority has concerns regarding the provision of creche in Phase 3. Preference would be for creche to be provided in Phase 2 to ensure services for future residents are provided in a timely manner.”

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to **Drawing No. 24004-OMP-00-SP-DR-A-1300 entitled Construction Phasing Plan, prepared by O’Mahony Pike Architects** which confirms that the proposed Creche in the ground floor of Block C, will be included in **Phase 1** of the development to ensure critical residential amenities such as childcare facilities are in place and provided in a timely manner; aligning with policies OCLAP10 and OCLAP11 of the Old Connaught Local Area Plan.

3.7 Daylight & Sunlight and Shadow Assessment

“A comprehensive daylight / sunlight / shadow assessment demonstrating the quality and performance of the proposed development.”

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to the **Daylight, Sunlight and shadow Assessment, prepared by Modelworks**.

The development performs well with a 98% compliance rate for daylight in applicable rooms when tested with trees and 99% when trees are excluded.

In terms of sunlight, following initial testing, 6 units did not fully comply with BRE guidelines. However, these apartment units benefit from a range of compensatory design measures which ensure a high standard of residential amenity. The identified apartment units overlook high-quality landscape communal open spaces, with a number also benefitting from dual-aspect layouts and/or universal design apartments which results in larger rooms. In addition, the window to apartment unit B2-101 has been repositioned to improve daylight performance.

In terms of sunlight to amenity areas, both areas of Public Open Space, as well as the creche play area, meet the BRE guidelines for sunlight provision and represent combined a 95% of their area meeting the threshold of 2 hours of sunlight on the 21st of March.

3.8 Biodiversity

“A Report that addresses any concerns raised by the DLR Biodiversity Officer, in particular the application should incorporate dedicated areas for biodiversity that are functionally and spatially distinct from public amenity space, and which provide demonstrable, evidence-based ecological benefits that can be clearly supported and monitored.

The following should be provided/addressed:

- *Ecological Impact Assessment (EcIA) prepared in accordance with the CIEEM guidelines for ecological assessment (CIEEM, September 20241)*
- *Appropriate Assessment Screening Report*
- *Invasive Species Management Plan*
- *The landscape architect inputs should be coordinate with the design team’s ecologist*
- *The lighting design engineer should liaise with the ecological specialists (including bat and non-volant mammal specialists), in respect of outdoor lighting.*
- *Hydrogeological assessments”*

Applicant’s Response

We refer the Planning Authority to **Appendix A of the Ecological Impact Assessment (EcIA)** which includes a response to LRD Opinion comments made by the Biodiversity unit, prepared by Brady Shipman Martin Built Environment Consultants which provides further detail in response to the DLR Biodiversity Officer.

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

3.9 Site Services

“Provision of a public lighting layout and report required which should address the requirements set out in the Lighting Departments Report, appended to this Report. (see Appendix C)

Submission of a Taking in Charge Map.

A Building Life Cycle Report should be included, addressing long-term maintenance, replacement cycles and cost implications.

*A report should be submitted setting out how the proposed development aligns with **the climate-action objectives of Chapter 3 of the Development Plan**, including measures related to energy efficiency, renewable technologies and climate-resilient design”*

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to the **Outdoor Public Lighting Report and Outdoor Public lighting layout Sheets 2 of 2 (Drawing No. SES 06526), prepared by Sabre Electrical Services Ltd** for compliance with the requirements set out in the Lighting Departments report. The design of street lighting has been designed in full accordance with the project Ecologist to ensure no undue harm arises to nearby local biodiversity.

We refer the Planning Authority to the **Take in Charge Map prepared by O’Mahony Pike Architects 24004-OMP-00-SP-DR-A-1500.** This includes areas to be TiC along with proposed Management Company areas and the pumping station to be adopted by Irish Water.

In respect to the additional items raised, we refer the Planning Authority to:

- A building Life Cycle report, prepared by Castlethorn Old Connaught UCL for further details addressing long-term maintenance, replacement cycles and cost implications.
- The Sustainability, Climate Action and Energy Statement, prepared by Delap and Waller for the proposed developments alignment with the climate action objectives of chapter 3 of the Development Plan, including measures covering energy efficiency, renewable technologies and climate resilient design.

3.10 Part V

It is noted that the Applicant has proposed to comply with the Part V requirement for the proposed development by way of transfer of forty-eight (48No.) residential units on site for social and affordable housing (i.e. 38 no. apartment units in Block 3, 6no. Duplex units and 4no. 3-bed houses). This proposal is based on a 20% Part V obligation, however it should be noted that this proposal falls short of the required number of Part V units. Based on a 20% proposal, the Council will seek the build and transfer of fifty-five (55No.) residential units on-site for social and affordable housing.

The Housing Department, full Report appended) raise the following concerns:

- *Due to location of the balconies in Block 3, which are situated above the 'sleep room' and the 'play area' of the proposed crèche, it would be the Councils preference for these balconies to have closed in / obscure glass.*
- *The proposed roof garden located in Block 3 should have restricted access. Details to be provided.*
- *Lack of parking proposed for the one-bedroom units a concern.*
- *Clarification required in regard to whether there is a 10% or 20% Part V obligation and to provide details of indicative construction/development costs and management service charges for consideration at the earliest opportunity.*
- *Block 3 design should have regard to section 4.4.1.2 'Policy Objective PHP36: Inclusive Design & Universal Access' of the County Development Plan 2022 - 2028, it is a Policy Objective to promote and support the principles of universal design.*

[Emphasis added by SLA]

Applicant's Response

We acknowledge the Planning Authority's concern regarding the shortfall in proposed Part V units. We refer to the **Part V proposal prepared by O'Mahony Pike Architects**, which updates the Part V proposal and provides for 55 no. units and fully accords with the 20% Part V obligation.

Additionally, in respect to the additional concerns raised, we refer the Planning Authority to:

- **Drawing No. 24004-OMP-B3-ZZ-DR-A-2000** entitled Block 3 Elevations & Section, which proposes glazing for the windows, privacy screening, balcony and railing (roof garden) to address the Planning Authority's concerns in regard to the overlooking and privacy concerns of the balconies in Block 3 over the 'sleep room' and the 'play area' of the proposed creche.
- In respect to limiting access to the proposed Block 3 roof garden, we note this area will only be accessible to private purchase units and managed by the management company.
- In line with National policy, a reduction of car parking has been applied across the development. We refer the Planning Authority to Drawing No. 24004-OMP-00-SP-DR-A-1200 prepared by O'Mahony Pike Architects which outlines the parking provision across the wider site.
- We refer the Planning Authority to the **Part V proposal plan entitled 24004-OMP-00-SP-DR-A-16000, prepared by O'Mahony Pike Architects**, which confirms a proposed 20% part V provision.
- Following the lodgement of a Part V request validation letter which included indicative costs and managements fees, a part V validation letter dated 10 July 2026 was issued.

- In relation to Section 4.4.1.2, Policy Objective PHP36: Inclusive Design and Universal Access of the County Development Plan 2022–2028, the scheme has been designed to support the principles of universal design. See Section 8 of Architect’s Design Statement.
- The proposed units meet or exceed the minimum floor area requirements set out in SPPR 2 of the Design Standards for Apartments Guidelines for Planning Authorities (2025). We note that the 2025 Apartment Guidelines reduced the proportion of units required to exceed the SPPR 2 minimum floor areas by 10% to 25% of all units, to support the viability of apartment schemes. In this context, 26.8% of the proposed units exceed the SPPR 2 minimum floor areas, comfortably exceeding the 25% standard.

3.11 Environmental

As requested by the Environmental Enforcement Department (report appended), the following documents to be submitted:

- *Construction Environmental Management Plan*
- *Operational Waste management Plan (to cover bins, bin storage, refuse collections etc).*
- *Resource and Waste Management Plan*
- *Baseline Noise Survey*
- *Noise Impact Assessment due to proximity to rail line and any required acoustics solutions provide as part of proposed design both to internal and external areas. See Noise Action Plan which was published last year.*

An EIA Screening Report and Appropriate Assessment Screening should be prepared and submitted application to confirm this at LRD application stage.

[Emphasis added by SLA]

Applicant’s Response

We refer the Planning Authority to the enclosed documents submitted with this LRD planning application: -

- Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates
- Construction Environmental Management Plan, prepared by AWN Consulting
- Resource and Waste Management Plan, prepared by AWN Consulting
- Baseline Noise Survey, prepared by Traynor Environmental Ltd.
- Environmental Noise and Vibration Impact Assessment, prepared by Traynor Environmental Ltd.
- Appropriate Assessment Screening Report, prepared by Brady Shipman Martin Built Environment Consultants.
- Ecological Impact Assessment Report, prepared by Brady Shipman Martin Built Environment Consultants.

Stephen Little & Associates are committed
to progressing and achieving sustainable
development goals.

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