

Old Connaught, Phase A, Sub-Phase 1 Statement on Landscape and Biodiversity (LRD Application)

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Client:

Castlethorn Old Conna ULC

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1 Introduction

Castlethorn Old Conna ULC (the Applicant) is applying to Dún Laoghaire Rathdown County Council for planning permission for development of lands at Old Connaught. The proposed development is located on lands to the west of the M11 motorway, east of Ferndale Road and north of Old Connaught Avenue.

Brady Shipman Martin (BSM) has been commissioned by the applicant to prepare this Statement on Landscape, Biodiversity and Visual aspects relating to the proposed large scale residential development (LRD). The proposed development is described in full in the architecture, engineering and planning reports that accompany this LRD application.

The planning application is accompanied by, *inter alia*, detailed copies of the following documents:

- Ecological Impact Assessment (EclA) – supported by a comprehensive biodiversity surveys.
- Appropriate Assessment Screening Report.
- This Landscape Design Statement, together with landscape masterplan and related landscape drawings.
- Visual Impact Report with Photomontages.

2 Old Connaught Local Area Plan 2025 and Statutory Context for the Proposed Development

The application lands comprise part of the lands subject to **Old Connaught Local Area Plan 2025** (LAP), which sets out policies and objectives to guide future development in Old Connaught. The LAP was made by the Elected Members, by way of a resolution and with material alterations, at a Special Council Meeting on the 28 October 2025 and came into effect on December 9 2025.

The application lands, which are zoned as ‘**Potential Future Residential Lands**’ in the LAP, lie within **Phase A** lands, which are considered sequentially preferable for the first phase of development at Old Connaught. The Phase A lands correspond with lands zoned ‘**Objective ‘A1**’ under the dlr County Development Plan 2022-2028: “*To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans*” (refer to **Figure 2.1**).

The Phase A lands are located immediately north and south of Old Connaught Avenue. Phase A incorporates 2 sub-phases: 1 and 2, where **sub-phase A1** is located north of Old Connaught Avenue and west of the M11 Corridor.

The lands included in this application corresponds to the sub-phase A1 area as identified on Figure 11.3 of the LAP. This is an area where proposed residential development is “*supported by existing infrastructure capacity, interim measures including wastewater infrastructure and additional enabling infrastructure proportionate to the scale of development.*”

It is noted that the policies and objectives of the **Old Connaught Local Area Plan 2025** have been extracted in Appendix 3 of the LAP. Biodiversity, green infrastructure, landscape and open space related policies and objectives of the LAP have been extracted and specific responses provided in **Appendix 1** to this report.

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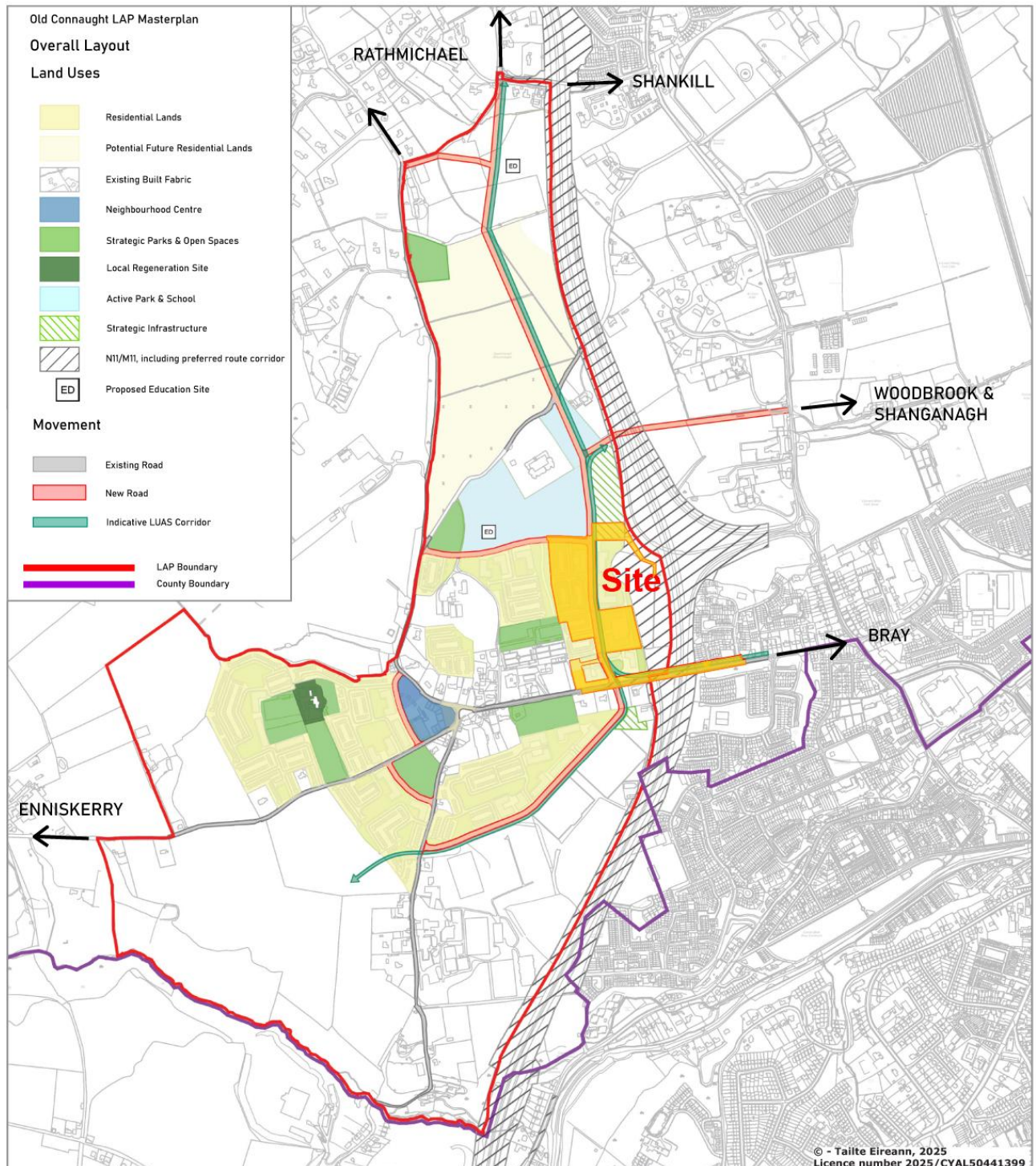


Figure 2.1 Overarching Masterplan for Old Connaught (Figure 4.1) from Old Connaught Local Area Plan 2025 (Approximate Application Site shaded in yellow and outlined in red)

The Phase A lands, including sub-phase A1 and the application site is located within the **Central Character Area** as set out in Section 4.4.5 and Figures 4.4 & 4.10 of the LAP. **Objective SDF2 – Masterplan** of the LAP requires that a **Masterplan** is prepared by the Applicant(s) for significant development within each Character Area, for lands within the Applicant's ownership. In this regard a Masterplan has been prepared for the lands in the Applicants control and is submitted with the application.

The Central Character Area is located to the north of Old Connaught Village. The area is bordered by the M11 to the east, Ferndale Road to the west, and Allies River Road to the north. The topography of the lands rises from east to west. The LAP notes that:

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“The Central Character Area is primarily greenfield in nature which presents an opportunity for the creation of a new residential neighbourhood with a distinct sense of place and identity informed by the natural landscape and environment of the area. The primarily undeveloped nature of the lands allows for the creation of a coherent movement strategy to serve the area with emphasis on an active travel network to enable future residents to move around the area in a sustainable way – along footpaths, cycle tracks and green routes.”

Table 4.5 of the LAP sets out the Site Development Framework for the wider Central Character Area – which includes the following in relation to green infrastructure, biodiversity, open space, parks and recreation.

Green Infrastructure and Biodiversity	• Protection of trees and hedgerows (see section 7.5.6, Chapter 7). • Retain the sylvan character of Ferndale Road and Allies River Road (see Objective GIB10, Chapter 7). • Consider the Glendoo Mountain to Shanganagh Wildlife Corridor (see section 7.5.4, Chapter 7). • Consider potential biodiversity benefits in the design of the primary attenuation pond. • Protect the Old Connaught Tributary (see section 7.5.7, Chapter 7).
Open Spaces, Parks and Recreation	• Provision of strategic open spaces – Walled Gardens Park / Allied River Road Park / Allies River Road Active Park (see section 8.4.1, Chapter 8). • Public open space for residential schemes - 10% of total net residential site area. Provide for a north-south greenway spine connecting the Walled Gardens Park and Allies River Road Active Park and School.

Figures 4.11 & 4.14 of the LAP (refer to **Figure 2.2** of this report) sets out the **Site Development Framework**, and the **Open Space / Environment** for the wider Central Character Area. These figures are included in this report with the application lands outlined in red and shaded in yellow for reference.

The application site, which is located to the north of Old Connaught Avenue and to the east of the development lands, proposes a new access and road north off Old Connaught Avenue. The site straddles the north south line of the indicative future LUAS corridor refer to **Figure 2.2**.

A future **Strategic Park / Open Space** is identified to the west of the site, while a future **Active Park** (and school site) is identified to the north / northwest. **Local Public Open Space** is identified within the residential development areas, and an **Attenuation Pond** is identified to the northeast of the site – part of which is within the application site, refer to **Figure 2.2**.

In accordance with the requirements of the LAP, the proposed access road crosses one identified ‘**Existing Hedgerows**’, while further Existing Hedgerows are identified to the east of the site. Trees along the north-side of Old Connaught Avenue are identified under an objective ‘**To Protect and Preserve Trees and Woodlands**’ in the dlr Development Plan 2022-2028. Lands to the east of the development areas are identified as part of the ‘**N11/M11 Preferred Route Corridor**’, refer to **Figure 2.2**.

While Figure 7.3 of the LAP shows protected views and prospects (from the dlr Development Plan) in the wider area, Figures 4.11 and 4.14 of the LAP (refer to **Figure 2.2** below) indicate that the only protected views and prospects in the direct vicinity of the application site is east from Ferndale Road – which are screened by mature roadside hedgerows – and west off the curving merge ramp from the R119 Wilford Roundabout onto the M11 Northbound, which are entirely screened by existing planting established on the west side of the northbound ramp / M11 corridor.

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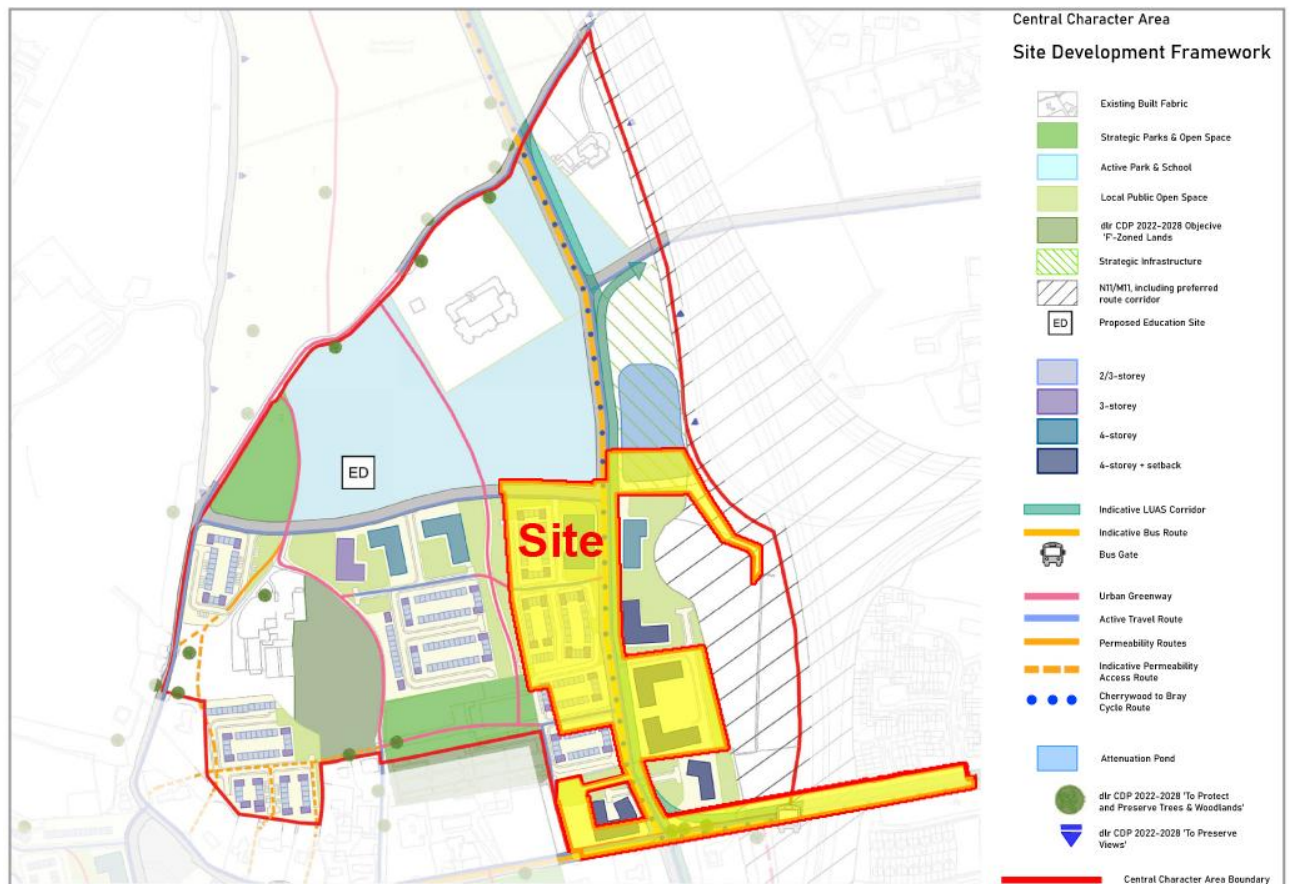


Figure 4.11: Central Character Area – Site Development Framework

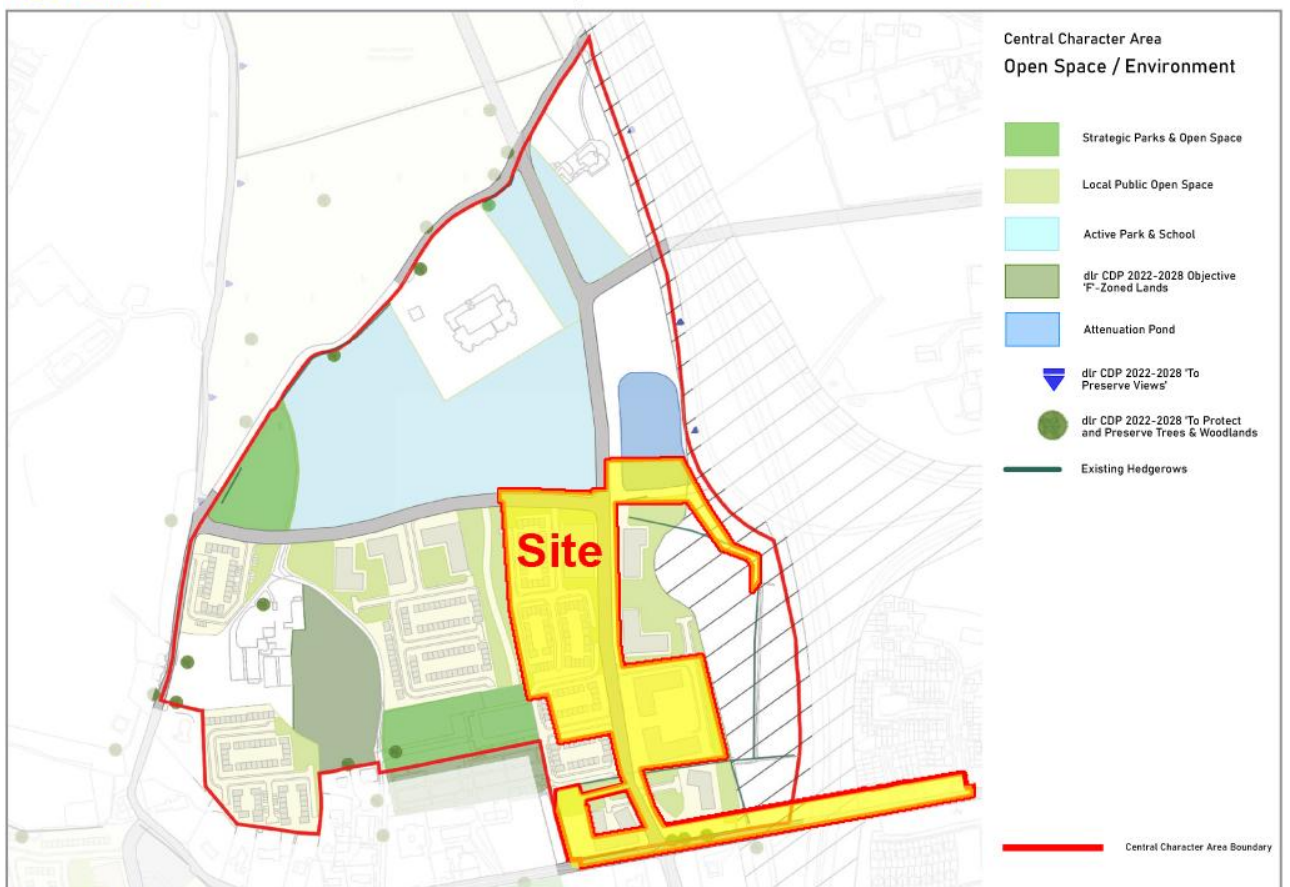


Figure 4.14: Central Character Area – Open Space and Environment

Figure 2.2: Extracted Figures 4.11 & 4.12 of Old Connaught LAP (Application Site shaded in yellow and outlined in red)

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Figure 2.3 provides an annotated extract of Figure 7.1 of the LAP showing features of biodiversity importance in the LAP area. Again the application site (outlined in red and shaded in blue) does not directly impact on features of ecological / biodiversity evaluation importance.

The proposed entrance and access road off Old Connaught Avenue, which is being provided in accordance with the requirements of the LAP, crosses one identified 'Existing Hedgerows', while further Existing Hedgerows are identified to the east of the site. These hedgerows have 'no classification' in the LAP. Trees along the north-side of Old Connaught Avenue – in the vicinity of the entrance and access road north off Old Connaught Avenue (which is being provided in accordance with the requirements of the LAP) – are identified under an objective 'To Protect and Preserve Trees and Woodlands' in the dlr Development Plan 2022-2028.

The site of the proposed development does not impact on any identified features of biodiversity importance identified in the LAP – other than limited impact on **unclassified hedgerows** in accordance with the requirements of the LAP.

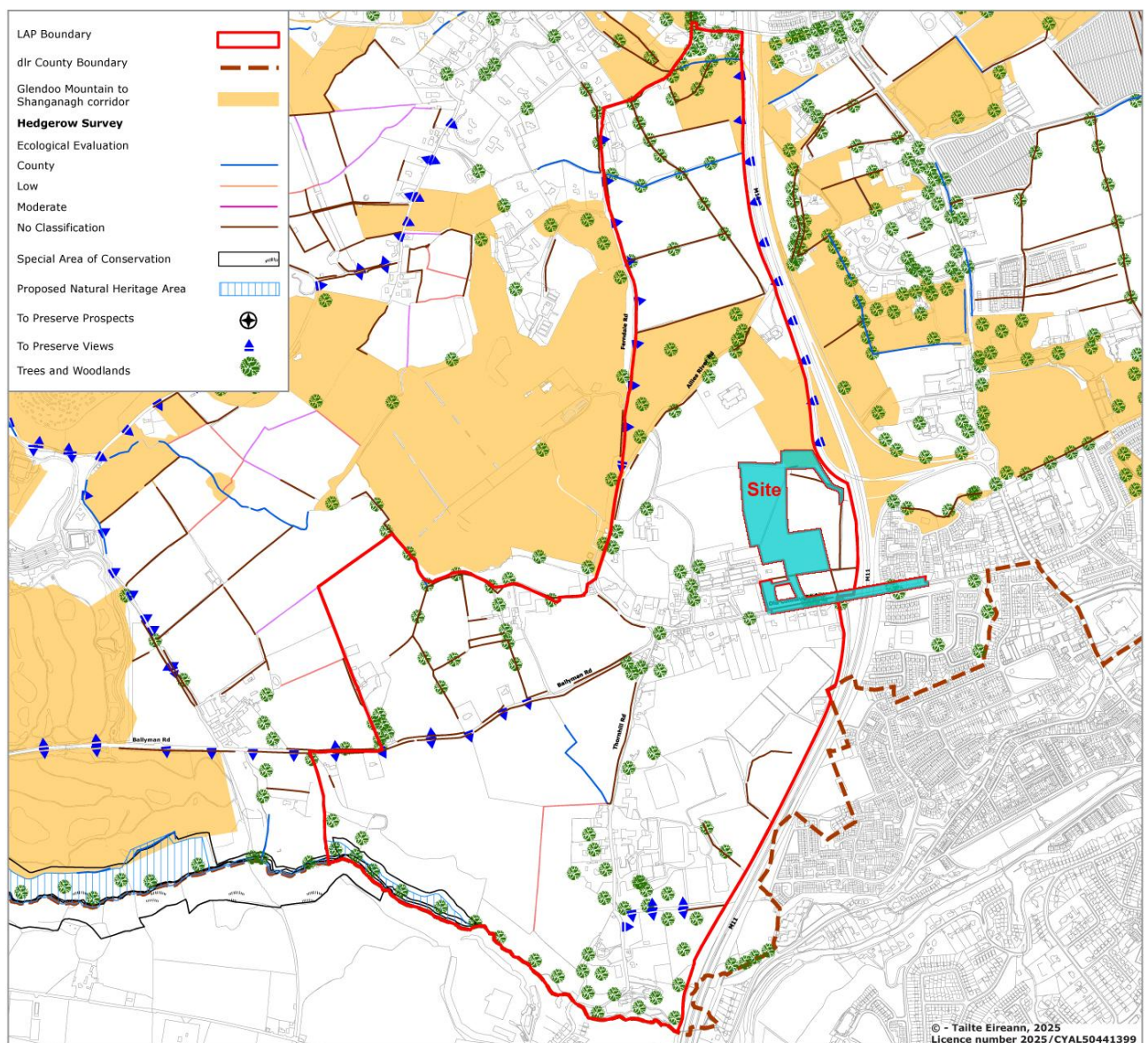


Figure 2.3: Map showing Biodiversity Importance in the Plan area (LAP Figure 7.1) (Application Site shaded in yellow and outlined in red)

3 Statement on Landscape and, Biodiversity

The application site is identified as sub-phase 1 with Phase A of the Old Connaught Local Area Plan. It is also identified as being within the **Central Character Area** of the LAP, which is described as follows (Section 4.4.5):

The Central Character Area is primarily greenfield in nature which presents an opportunity for the creation of a new residential neighbourhood with a distinct sense of place and identity informed by the natural landscape and environment of the area. The primarily undeveloped nature of the lands allows for the creation of a coherent movement strategy to serve the area with emphasis on an active travel network to enable future residents to move around the area in a sustainable way – along footpaths, cycle tracks and green routes.

The zoning reflects the zoning in the Dún Laoghaire-Rathdown County Development Plan 2022 – 2028, which includes an indicative corridor for the proposed extension of the Luas Green Line north-south through the Central Character Area, including the application lands.

The proposed development (refer to **Section 4** and **Figure 4.1** of this report) has been designed and laid out in accordance with the requirements of the Old Connaught LAP and in consultation with Dun Laoghaire Rathdown County Council.

3.1 Biodiversity and Landscape Overview

The proposed Phase A1 development site is located north of Old Connaught Avenue within the administrative area of Dún Laoghaire Rathdown County Council. The site is bounded by the M11 motorway to the east, Ferndale Road to the west, and Allies River Road to the north.

The lands comprise predominantly agricultural fields in arable use and associated boundary features. Topographically the site rises gradually from east to west.

There is existing residential development adjacent to the site including the Ferndale Court development to the north and Old Connaught House (a Protected Structure) to the west. The Festina Lente lands are located to the southwest of the proposed development site.

Woodland belts, treelines and hedgerows are present along field boundaries and adjoining lands. There are no watercourses as mapped in the EPA database, however there are minor drainage ditches/ streams present along the field boundaries including a ditch referred to as the Old Connaught Tributary in the LAP.



Figure 3.2 Location of the Proposed Development Site (refer to the Architects Drawings and Design Report for details)

3.1.1 Key Biodiversity Receptors

The subject lands at Old Connaught are not located within any designated site for nature conservation, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Natural Heritage Areas (NHAs)/proposed Natural Heritage Areas (pNHA).

However, as established through detailed ecological survey undertaken in the preparation of this planning application, the site supports hedgerow features (WL1) and several species-rich treelines (WL2) of local ecological importance, as assessed in accordance with the NRA/TII Guidelines. Four of the seven hedgerows within the development boundary are classified as Local Importance (Higher Value), namely Hedgerows 1, 3, 5, and 8, which are characterized by native scrub diversity, historical continuity (particularly Hedgerows 1, 3 and 4 which appear on first edition Ordnance Survey maps), and landscape connectivity value. Two of these hedgerows—Hedgerows 3 and 4 are designated as Heritage Hedgerows based on the hedgerow appraisal system assessment. Hedgerow 4 is considered to be of County Importance due to its impressive species diversity, habitat connectivity and historical context. Two hedgerows (Hedgerows 6 and 7) are classified as Local Importance (Lower Value) due to their lack of shrub layer diversity and, in the case of Hedgerow 7, non-native tree composition.

No rare, threatened or legally protected plant species, as listed in the Irish Red Data Book (Curtis & McGough, 1988), the Flora (Protection) Order 2022, or the EU Habitats Directive, are known to occur within the site and none have been recorded during the site visits. However, Three-cornered garlic a non-native invasive plant species (listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011) has been recorded which requires management during construction.

Evidence of pine marten was recorded via multiple scats located near the woodland edge adjoining Ferndale Court to the north of the subject site, outside the red line boundary. This indicates that pine marten use the wider landscape for foraging and movement via the hedgerows and treelines. No resting sites or dens were identified

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within the application site boundary. While pine marten may occasionally forage within the site's hedgerows and treelines, the site does not function as critical habitat for this species.

Badger surveys undertaken between October 2025 and May 2026 identified two potential minor sett entrances outside the subject site (one to the north and one to the south – within lands owned by Dún Laoghaire-Rathdown County Council; however, both were heavily overgrown and displayed no evidence of occupancy or active use during the survey period. An extensive search of the southern portion of the site within Dún Laoghaire-Rathdown Council lands, including camera trap deployment, revealed no further badger activity or occupied setts.

No evidence of otter activity, including dens, holts, spraint or other signs of presence, has been recorded by Wildlife Surveys Ireland during surveys undertaken in 2025–2026. Otters are protected under Article 12 of the Habitats Directive.

Bat surveys undertaken by Wildlife Surveys Ireland in October 2025 and May–June 2026 confirmed four bat species on-site—Common pipistrelle (*Pipistrellus pipistrellus*), Soprano pipistrelle (*Pipistrellus pygmaeus*), Leisler's bat (*Nyctalus leisleri*), and Brown long-eared bat (*Plecotus auritus*)—with an additional unidentified *Myotis* species recorded by static detector. The site supports moderate-to-intensive foraging and commuting activity, particularly concentrated along the southern treeline (WL2) within the application boundary, where sustained feeding activity by 4–6 common pipistrelles was recorded during May–June 2026 surveys. Occasional activity by Leisler's bat and Brown long-eared bat was also recorded on-site, whilst autumn surveys recorded sporadic transient activity. Mature trees within the application boundary, including an oak tree in the northern field, have roosting potential as assessed using the Tree Bat Roost Category Classification System; however, no active roosts were confirmed on-site. The site is of Local Importance (Higher Value) for bats as foraging and commuting habitat, particularly due to the intensive feeding activity concentrated at the southern treeline within the development boundary.

There are no groundwater dependent terrestrial ecosystems (GWDE) at the site, including those with potential links to Special Conservation Interests in European sites (such as petrifying springs or tufa-forming springs). No pathway exists for the proposed development to impact any GWDE or associated European designated sites through groundwater-dependent mechanisms.

There is no habitat on the site suitable for regular or sustained use by any protected bird species listed as a Special Conservation Interest (SCI) in any European site within the Zone of Influence. While a flock of approximately 20 curlews was recorded feeding on-site during an initial site visit in October 2025, this species was not recorded during any subsequent surveys undertaken between December 2025 and May 2026. This record represents transient passage only and the site does not constitute functionally important wintering or breeding habitat for curlew or any other protected bird SCI species. The improved grassland and arable fields do not provide the wet grassland or wetland habitat required as core foraging areas for wading birds or wildfowl species for which nearby SPAs are designated.

The site as a whole is considered to be of **Local Importance (Higher Value)**, in accordance with the NRA/TII Guidelines for Assessment of Ecological Impacts of National Road Schemes (2009, Rev.2). While the site comprises predominantly intensive arable and improved grassland habitat of lower ecological value, the presence and retained functionality of significant hedgerow and treeline features result in a higher overall site valuation. The ecological importance of these retained features is reinforced by their active utilisation by protected species. Four bat species (common pipistrelle, soprano pipistrelle, Leisler's bat, and brown long-eared bat) have been recorded on-site, with Local Importance (Higher Value) status assigned due to intensive foraging and commuting activity concentrated particularly at the southern treeline. A total of 25 bird species were recorded during breeding surveys actively utilising the hedgerows and treelines for nesting, indicating the site functions as important breeding habitat for common farmland and hedgerow-associated species. Evidence of pine marten utilisation of the hedgerow and treeline network indicates the site's role in supporting landscape-scale connectivity for protected mammals.

The site is not subject to any statutory ecological designation. It does not form part of, nor is it directly connected to, any Special Area of Conservation (SAC) or Special Protection Area (SPA). None of the habitats recorded on site correspond to Qualifying Interests (QIs) or Special Conservation Interests (SCIs) of any European site. An **AA Screening Report (AASR)** (BSM, 2026) has been prepared and indicates that the proposed development, individually

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or in-combination with other plans or projects, is not likely to have a significant effect on European sites, in view of the sites' conservation objectives. A Natura Impact Statement (NIS) is not required.

3.1.2 Tree survey

A tree survey has been prepared for the lands (The Tree File, 2026).

Of note are the east – west hedgerow / tree lines along Old Connaught Avenue and along the northern boundary of the field north of Old Connaught Avenue. In accordance with the provisions of the LAP a new entrance and access road will cross these features - as does the corridor of the potential future LUAS line.

A large pedunculate oak tree (*Quercus robur*) is located in an isolated position within the large arable field part of which is within the application site (refer to **Plate 3**). While prominent, the tree is classified as C2 (low value). Nevertheless, given its prominence this tree is retained and incorporated within proposed public open space.

In addition to this large oak, the tree survey includes data for two other individual trees (a sycamore (Category C2) and a Turkey oak (Category B2 – moderate value) and nine boundary hedgerows / tree lines of varying condition and complexity, most of which are classified as Category C/C2, with one boundary (Boundary 6, to the east of the subject site) noted as Category B.

3.1.3 Landscape

The landscape of the southeast area of Dún Laoghaire-Rathdown is an intrinsic asset of Old Connaught and to a great degree defines the area. The area is framed by its wider coastal and upland setting, which is integral to the area and adds greatly to the quality of life of residents.

The Old Connaught area is distinctively agricultural in nature and falls towards east towards the M11 Motorway corridor. There are views west / northwest to rising uplands including Carrickgollogan, and southeast / south to Bray Head and the Sugar Loaf.

For the most part – and with the exception of the southern boundary with Old Connaught Avenue, the boundary of the application lands do not align with existing boundaries and are largely undefined within the agricultural landscape. The main portion of the application site – and the proposed residential development area – comprises the eastern section of a large arable field with a prominent mature albeit storm damaged oak tree (refer to **Plates 2 & 3**). The southern portion of the application site, provides for a new entrance and access road off Old Connaught Avenue, comprises a small field of rough grassland (refer to **Plate 4**) enclosed by mature hedgerows / treelines (refer to **Plate 1**) – including along Old Connaught Avenue.

As noted in section 7.4.3 of the LAP, Old Connaught benefits from upland and seascape views and prospects which contribute positively to the character of the area. The dlr County Development Plan 2022 – 2028 includes Policy Objective GIB6: Views and prospects – “...to preserve, protect and encourage the enjoyment of views and prospects of value.” Map 7.3 of the LAP identifies the protected views and prospects in the area.

Lower level views of the proposed development (e.g. from Ferndale Road) are entirely screened by a combination of mature roadside / boundary vegetation and topography. Elevated views from higher lands to the west are panoramic and expansive and while it may be possible to see aspects of the proposed development in the lower middle-ground of such views, there is no adverse effect on the characteristics or sensitivities of the views.

Figures 4.11 and 4.14 (refer to **Figure 2.2** above in this report) indicate that the only protected views and prospects in the direct vicinity of the application site is east from Ferndale Road – which are screened by mature roadside hedgerows – and west off the curving merge ramp from the R119 Wilford Roundabout onto the M11 Northbound, which are entirely screened by existing planting established on the west side of the northbound ramp / M11 corridor.

Views within the application lands are across the wider generally open agricultural lands to mature hedgerows and treelines that enclosed these wider lands. That said there are open attractive views above the enclosing vegetation to the higher grounds of rising lands to west / northwest (e.g. Carrickgollogan) – and to Bray Head to the southeast.

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3.1.4 Plates



Plate 1: Southern treeline / hedgerow boundary between the main large arable field (northern portion of the site) and small grassland field (southern portion of the site)



Plate 2: View of the main large arable field (northern portion of the site) - residential zoned lands.



Plate 3: The Oak Tree (Class C2) in large open arable field within northern portion of the application site.

This tree is in poor condition but is retained within public open space where a new small oak grove is also proposed.



Plate 4: View of smaller grassland field (southern portion of the application site).

4 The Proposed Development

The proposed development comprises 271no. dwellings in a mix of houses and duplex / apartment units, including 103no. 2 to 3-storey houses (22no. 4-bedroom, 68no. 3-bedroom and 13no. 2-bedroom), 162no. apartments (113no. 2-bedroom and 49no. 1-bedroom) across 4no. blocks ranging from 1-5 storeys in building height and 6no. 3-bedroom duplex units; 1no. creche (c. 574 sqm) at ground floor of Apartment Block 3; and all associated and ancillary site development and infrastructural works including on site attenuation, hard and soft landscaping and boundary treatment works, including: public open space; communal open space; components of the regional attenuation pond; public lighting; surface car parking spaces; bicycle parking spaces/stores for houses and duplex / apartment units; 5no. ESB substations; bin stores; vehicular access via existing Old Connaught Avenue and a proposed new primary north-south street into the eastern portion of the Central Character Area. The proposed development also includes the construction of a new pumping station, associated single storey building, twin rising mains extending circa 400m along Old Connaught Avenue under the M11 connecting to the existing gravity foul network on Old Connaught Avenue 125m east of the M11 bridge and associated storage, together with all ancillary site development and reinstatement works required to facilitate these elements.



Figure 4.1 Proposed Development at Old Connaught (refer to the Architects Drawings and Design Report for details)

5 The Landscape Masterplan

An extract of the landscape masterplan is provided at **Figure 5.1** (Refer also to **Landscape Masterplan Drawings 7245-BSM-00-ZZ-DR-L-300, 7245-BSM-00-ZZ-DR-L-300.1, and 7245-BSM-00-ZZ-DR-L-301**).



Figure 5.1 Proposed Landscape Masterplan and Development Layout

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The detailed landscape masterplan prepared for the application site, provides for:

- Provision of a large central area of primary public open space with a further southern area of public open space, providing for active and passive amenity and social engagement;
- The central public open space includes formal and informal play features, seating, and gardens, and provides for direct connectivity to and from future open space to the immediate west;
- Retention of an existing mature oak tree, which while not in good condition, as a prominent feature within the public open space. A new oak tree grove is proposed in recognition of the retained tree and for longer term succession;
- The southern area of public open space, which fronts a retained line of mature trees, incorporates seating, play and SuDS;
- An underground attenuation feature is included within the central public open space;
- Large street trees and associated distinctive feature planting along the main north-south boulevard;
- Tree planting along other streets throughout the application areas
- Diverse groundcover planting in landscape spaces along road corridors
- High quality soft and hard landscaping at residential thresholds and permeable paving in parking areas and incorporation of rain gardens in the streetscape
- A new native hedgerow defining the interface between the residential lands and the M11 corridor to the east.

The plan identifies that a limited number of trees and sections of hedgerow will be removed – primarily to facilitate the required junction with Old Connaught Avenue and to access the proposed residential area. As such the removal of trees and sections of hedgerows has been minimised and align with the structural framework of the LAP. Significant new tree and hedgerow planting – greatly in exceedance of that removed, is proposed in the landscape masterplan / scheme.

The public open spaces are illustrated on Figures 5.2 and 5.3. The communal open spaces are illustrated on Figure 5.4.

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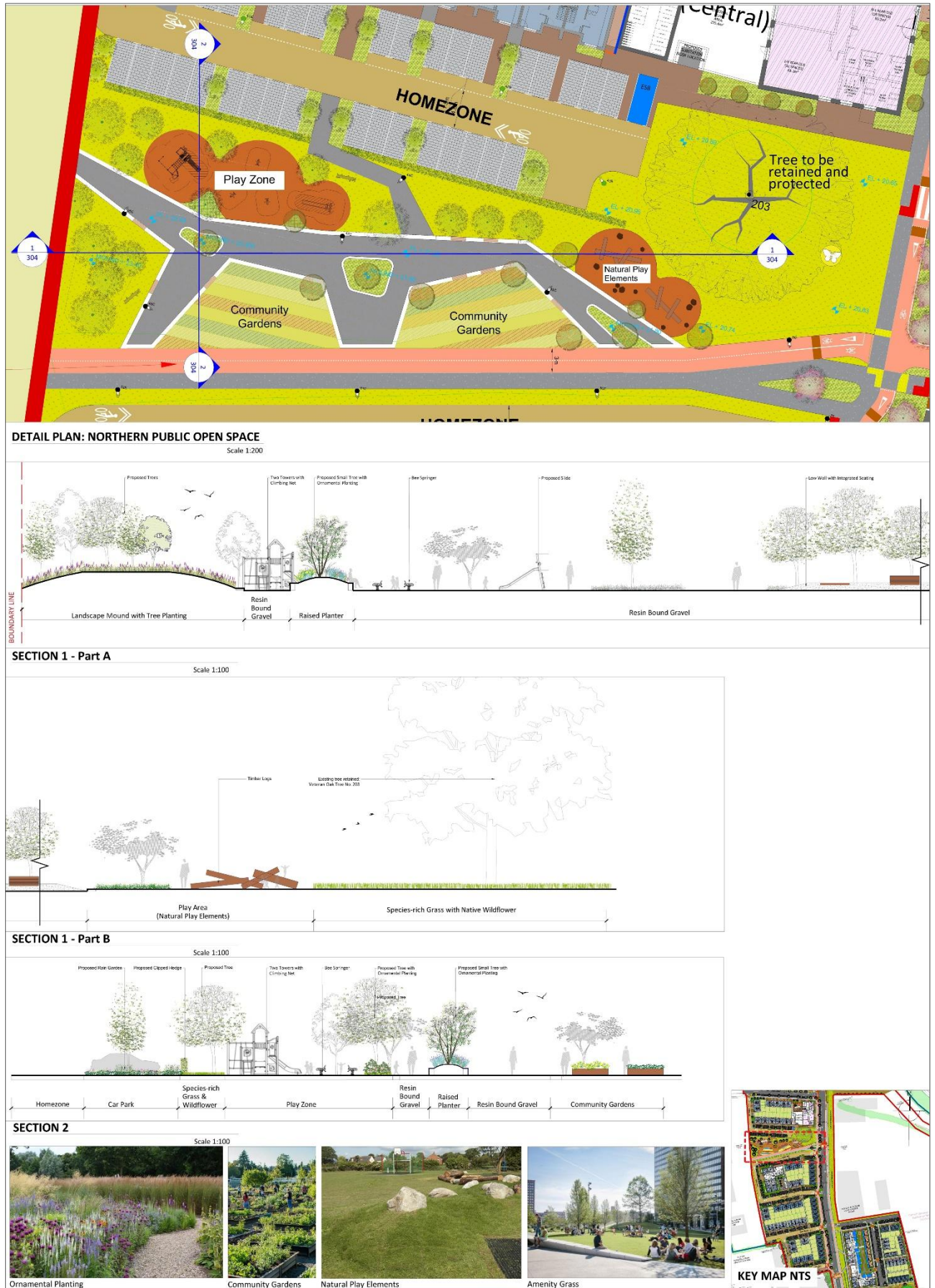


Figure 5.2 Proposed Central Public Open Space

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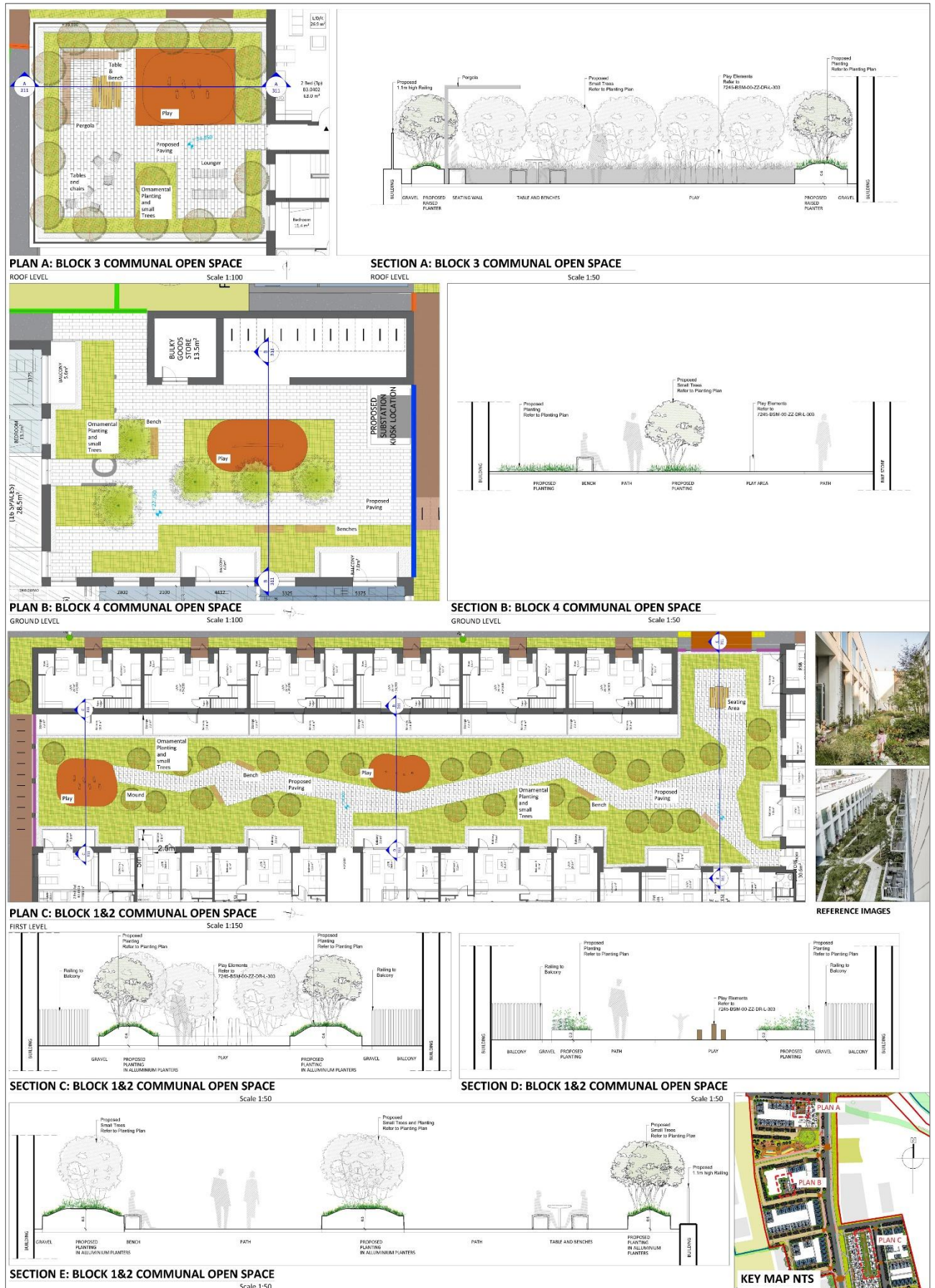


Figure 5.4 Proposed Communal Open Spaces

6 Conclusion

The proposed development will result in the removal of existing arable and unmanaged grassland fields, to be replaced by housing, open space and related infrastructure all in accordance with the provisions of the Old Connaught Local Area Plan 2025.

There are no features of identified Biodiversity Importance (Map 7.1 of the LAP) within the application lands. Nevertheless, the layout of the proposed development has been designed to take account of existing ecological features in the subject site and an existing mature oak tree is being retained. New habitats are being provided and new oak tree planting and biodiversity-focussed landscaping, is also proposed.

Following the implementation of all measures associated with the proposed development at Old Connaught it is not expected that there will be any long-term residual impacts on any landscape or biodiversity receptors, either within or in the vicinity of the site, or associated with any site designated for nature conservation as a result of the proposed development.

Once established, the proposed development will represent a positive contribution to residential development in the area with associated local public open space and connectivity. In a fully built out scenario the proposed development will comprise part of a well-designed modern suburban neighbourhood supported by strategic and active parks, amenities, cycleway, footpaths, and connections within a new emerging neighbourhood – all in accordance with the provisions of the Old Connaught LAP 2025.

In addition, there will be no significant effects on any European sites – as confirmed in the preliminary Appropriate Assessment (AA) Screening Report, submitted separately.

These conclusions are supported by a comprehensive suite of biodiversity, landscape and visual reports submitted with the planning application.

Appendix 1: Response to Landscape-related aspects raised by Dún Laoghaire-Rathdown County Council in LTD Stage 2 Opinion

This Appendix provides a response to the landscape-related aspects raised by Dún Laoghaire-Rathdown County Council in LTD Stage 2 Opinion dated 15 April 2026 issued on foot of the consultation meeting of 26 March 2026 for the proposed Old Connaught Phase A1 Large-scale Residential Development.

1. Existing Trees

The opinion notes *“the importance of the Veteran Oak Tree (no.203) and the need to retain it as part of any future development. This tree has the potential to form a landmark entrance and foster a greater sense of place in any proposed development. The crown dead wood and mycorrhizal fungi in the root zone are an important repository for local wildlife.”*

Response: The layout has been revised to retain the Oak tree (No. 203) as a landmark feature within an extended central public open space.

The opinion notes that a *“future proposed link between this site and the DLR plot to the south. The location of the link 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.”*

Response: The link is not proposed as part of this development. Nevertheless, the proposed layout of development and of the southern public open space includes for provision of a potential a link, which if required can be provided where there are trees of lower quality.

2. Proposed Landscape Layout

The opinion notes that the *“proposed main north/south corridor lacks a strong soft landscape concept that will help to break up the vast and uninterrupted roadway. This corridor needs 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.”*

Response: The layout of the north south-south boulevard has been revised to reduce car parking and to provide for additional distinctive and sustainable street tree planting and associated groundcover, SuDS (rain-garden) and biodiversity planting. The approach has been co-ordinated with pedestrian / cycle facilities; with surface water measures; and with services to maximise the potential to provide human-scale social spaces.

The opinion notes that to the south east corner of the site, *“the proposed open space between the 2 blocks should be looked at as a useable, open space rather than a carpark. It was suggested at the meeting that the access road could be moved to the eastern side of the blocks along the M11 reserve which would free up the central area for public open space.”*

Response: To revise the layout at suggested would have a significant effect on the efficiency of the layout and the required density for the proposed development. However, it is noted that the ‘carpark’ as noted is in effect at lower ground level, with a landscape / amenity podium above. It is also noted that the layout of the southeast area of the site has been revised to provide for a new hedgerow along the M1 corridor.

The opinion notes that the *“main, triangular open space to the north west corner of the site is completely flanked along its northern edge with car parking. The disconnect with the proposed residential units further to the north is further exacerbated with parking additional parking along the residential blocks. The idea to retain the veteran oak tree (no. 203) has the potential to create a meaningful, useable and high quality piece of open space.”*

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Response: Car parking along the northern edge of main public open space has been revised to accommodate a strategic pedestrian crossing / access with enhanced connectivity to and presentation of the open space. New hedgerows are introduced to define the open space and to screen car parking to the north.

The layout has also been revised to retain the Oak tree (No. 203) as a landmark feature by extending the area of this central public open space.

3. Additional Note:

The **Response to the Green Infrastructure and Biodiversity Policies and Objectives of the Old Connaught LAP 2025** has been revised and updated to take account of comments from the 'Biodiversity Response to 'Statement on Landscape, Biodiversity and Visual' provided in the Opinion – refer to **Appendix 2** of this report and to the accompanying Ecological Impact Assessment Report (BSM, 2026).

Appendix 2: Response to Green Infrastructure and Biodiversity Policies and Objectives of the Old Connaught LAP 2025

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Appendix 1: Response to Green Infrastructure and Biodiversity Policies and Objectives of the Old Connaught LAP 2025

Chapter 7: Green Infrastructure and Biodiversity

Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
Pol. 7.3	Green Infrastructure	OCLAP36	Green Infrastructure	It is Policy, where practicable and possible, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the creation, management, restoration and enhancement of our natural and semi natural areas.	The application lands predominantly comprise open agricultural lands and avoid impact on aspects of Biodiversity Importance as indicated on Figure 7.1 of the LAP. The proposed development includes a new entrance off Old Connaught Avenue and road north which cross identified existing hedgerows on Figure 7.1. While these hedgerows have ‘no classification’ on Figure 7.1, these have been assessed in the EcIA and the arborists and the location of the proposed entrance and road north is in accordance with the site framework established on Figure 4.1 in the LAP. The proposed development respects existing green infrastructure incorporating hedgerows, an existing mature oak tree, and tree lines into proposed open space, and by including new, locally appropriate planting, to maintain habitat connectivity through and around the subject site.
Pol. 7.4.3	Views and Prospects	OCLAP37	Views and Prospects	It is Policy to ensure the preservation of the views and prospects at Old Connaught, as designated in the dlr County Development Plan 2022-2028.	Figure 7.3 of the LAP shows protected views and prospects (from the dlr Development Plan) in the wider area. Lower level views of the proposed development (e.g. from Ferndale Road) are entirely screened by a combination of mature roadside / boundary vegetation and topography. Elevated views from higher lands to the west are panoramic and expansive and while it may be possible to see aspects of the proposed development in the lower middle-ground of such views, there is no adverse effect on the characteristics or sensitivities of the views. Figures 4.11 and 4.14 (refer to Figure 2.2 of this report) indicate that the only protected views and prospects in the direct vicinity of the application site is east from Ferndale Road – which are screened by mature roadside hedgerows – and west off the curving merge ramp from the R119 Wilford Roundabout onto the M11 Northbound,

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Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
					which are entirely screened by existing planting established on the west side of the northbound ramp / M11 corridor.
Pol. 7.5.2	Designated Areas	OCLAP39	Groundwater Dependent Terrestrial Ecosystems	It is Policy that any development proposals with the potential to impact on the Ballyman Glen SAC or any Groundwater Dependent Terrestrial Ecosystems (GWDTE) within the area shall be assessed collaboratively at planning application stage by a hydrogeologist/hydrologist and ecologist and shall take cognisance of the requirement to maintain the rate, quality and general areas where groundwater recharge occurs in order to maintain or enhance the recharge supplying the groundwater dependent habitats of the Ballyman Glen SAC or any other GWDTEs within the area. Detailed site-specific assessment shall be required for development proposals situated in the catchment area for GWDTE situated in Ballyman Glen SAC that have the potential to impact groundwater through emissions, abstraction or changes to hydrogeological/hydrological regimes. Appropriate cognizance shall be had to potential connections and interactions between surface water and groundwater.	Ballyman Glen SAC is not within the Zone of Influence of the proposed development at Old Connaught, and no GWDTE are known to be present at the subject site. Nevertheless, the potential impacts on GWDTE has been considered by the design team and ecologist.
Pol. 7.5.5	Fauna	OCLAP40	Ecological Assessment	It is Policy to ensure adequate ecological surveys, and, where necessary, ecological impact assessments, are undertaken at project level to inform development decisions, in accordance with the requirements of the dlr County Development Plan 2022- 2028.	As required, and as requested by the planning authority, a comprehensive suite of biodiversity surveys has been carried out, including detailed botanical, bird (winter and breeding seasons), bat and large mammal surveys. The survey results are incorporated into the detailed EclA, submitted with the planning application.
Pol. 7.5.6.2	Hedgerows	OCLAP41	dlr Tree Strategy	It is Policy to require that the approach to existing and proposed trees throughout the Plan area is consistent with the dlr Tree Strategy 'A Climate for Trees 2024-2030', to ensure that the tree cover is managed, and developed to optimise the environmental, climatic and	This policy is noted. A full tree survey and arboricultural impact assessment, with management recommendations has been prepared for the application lands. Trees and hedgerows have also been considered separately in the EclA.

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Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
				educational benefits, which derive from an 'urban forest', and holistic 'urban forestry' approach.	The removal of trees and sections of hedgerows has been minimised and align with the structural framework of the LAP. Significant new tree and hedgerow planting – greatly in exceedance of that removed, is proposed in the landscape masterplan / scheme.
Pol. 7.5.9	Nature Based Solutions	OCLAP42	Nature Based Solutions and Biodiversity	It is Policy to ensure biodiversity is factored into nature-based solutions when developing proposals within the Plan area.	Nature-based solutions are a central focus of the landscape, biodiversity and water management strategy for the proposed development. SuDS measures have been incorporated – and an attenuation area is provided. This is designed to provide additional wetland habitat at the site.
		OCLAP43	SuDS and Biodiversity	It is Policy to ensure that the design of swales and stormwater attenuation areas and SuDS proposals include commitments to addressing a net gain in biodiversity. Where planting is required, native species must be used, including trees where suitable, with advice and input of a wetland ecologist.	SUDS proposals have been designed to maximise their biodiversity value – and native species have been used as well as All-Ireland Pollinator species.
Ob. 7.4.1	Landscape Character Assessment	GIB1	Landscape Character Areas	It is an Objective that development within the Plan Area has regard to, where relevant, the findings of the Landscape Character Assessment for Ballyman (no. 11) and Rathmichael (o. 10), as set out in Appendix 8 of the dlr County Development Plan 2022-2028, and any future County Landscape Character Assessments.	This is noted as is the character area assessments presented in the Old Connaught LAP for the Central Character Area lands where the application site is located.
Ob. 7.4.2	Historic Landscape Character Assessment	GIB2	Historic Landscape Character Assessment	It is an Objective that development within the Plan area has regard to the Old Connaught Historic Landscape Character Assessment (2007).	This is noted and the proposed development accords with the requirements of the Old Connaught LAP and the Historic Landscape Character Assessment (2007) as detailed at section 7.4.2 of the LAP.
Ob. 7.4.3	Views and Prospects	GIB3	Views and Prospects	It is an Objective that views and prospects within landholdings are further assessed as part of the development management process for planning applications in the Plan area. Where possible, the	Figure 7.3 of the LAP shows protected views and prospects (from the dlr Development Plan) in the wider area. Lower level views of the proposed development (e.g. from Ferndale Road) are entirely

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Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
				Planning Authority will seek to integrate the viewing potential of existing views and/or prospects.	screened by a combination of mature roadside / boundary vegetation and topography. Elevated views from higher lands to the west are panoramic and expansive and while it may be possible to see aspects of the proposed development in the lower middle-ground of such views, there is no adverse effect on the characteristics or sensitivities of the views. Figures 4.11 and 4.14 (refer to Figure 2.2 below) indicate that the only protected views and prospects in the direct vicinity of the application site is east from Ferndale Road – which are screened by mature roadside hedgerows – and west off the curving merge ramp from the R119 Wilford Roundabout onto the M11 Northbound, which are entirely screened by existing planting established on the west side of the northbound ramp / M11 corridor. Views within the application lands are across the wider generally open agricultural lands to mature hedgerows and treelines that enclosed these wider lands. That said there are open attractive views above the enclosing vegetation to the higher grounds of rising lands to west / northwest (e.g. Carrickgollogan) – and to Bray Head to the southeast. For the most part – and with the exception of the southern boundary with Old Connaught Avenue, - the boundary of the application lands do not align with existing boundaries and are largely undefined in the agricultural landscape.
Ob. 7.5.4	Ecological Network and Wildlife Corridor	GIB4	Ecological Corridors and Connectivity	It is an Objective to seek to: - Protect, preserve, restore and enhance ecological connectivity within the Plan area and beyond and to restore and mitigate fragmentation of ecological corridors. - Encourage the design and function of green infrastructure to support the movement of species across the area.	The application lands predominantly comprise open agricultural lands and avoid impact on aspects of Biodiversity Importance as indicated on Figure 7.1 of the LAP. The proposed development includes a new entrance off Old Connaught Avenue and road north which cross identified existing hedgerows on Figure 7.1. While these hedgerows have ‘no classification’ on Figure 7.1, these have been assessed in the EcIA and the arborists and the location of the proposed entrance and

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Statement on Landscape and Biodiversity (LRD Application)

Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
				Facilitate the creation of new wildlife corridors within new development sites that connect to the wider landscape, as part of the development management process for planning applications in the Plan area	road north is in accordance with the site framework established on Figure 4.1 in the LAP. The proposed development respects existing green infrastructure incorporating hedgerows, an existing mature oak tree, and tree lines into proposed open space, and by including new, locally appropriate planting, to maintain habitat connectivity through and around the subject site.
		GIB5	Glendoo Mountain to Shanganagh Wildlife Corridor	It is an Objective to consider the Glendoo Mountain to Shanganagh Wildlife Corridor, identified in the dlr County Biodiversity Action Plan 2021 – 2025, as part of the development management process for planning applications in the Plan area.	This Objective is noted by the project team, and while the subject site is to the south of the Glendoo Mountain to Shanganagh Wildlife Corridor, the landscape design of the proposed development maintains habitat connectivity to the wider area. This is further addressed in the EcIA.
Ob. 7.5.5	Fauna	GIB6	Lighting	It is an Objective that the design of lighting within the Plan area should seek to minimise light pollution and adverse effects on bat species, badgers and otters.	The lighting design takes account of and implements all relevant modern lighting standards/ particularly with regard to light spill, light temperature and dark areas for bat commuting, and in accordance with DLR lighting requirements. This is further addressed in the EcIA.
Ob. 7.5.6.2	Hedgerows	GIB7	Trees and Hedgerows	It is an Objective to protect and maintain important trees and hedgerows within the Plan area, where practicable, and to promote native tree / hedgerow enhancement and planting. The retention and protection of existing trees / woodlands / hedgerows shall accord with the requirements of the dlr County Development Plan 2022-2028.	The application lands predominantly comprise open agricultural lands and avoid impact on aspects of Biodiversity Importance as indicated on Figure 7.1 of the LAP. The proposed development includes a new entrance off Old Connaught Avenue and road north which cross identified existing hedgerows on Figure 7.1. While these hedgerows have ‘no classification’ on Figure 7.1, these have been assessed in the EcIA and the arborists and the location of the proposed entrance and road north is in accordance with the site framework established on Figure 4.1 in the LAP. A full tree survey and arboricultural impact assessment, with management recommendations has been prepared for the application lands. The removal of trees and sections of hedgerows has been minimised and align with the structural framework of the LAP.

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Statement on Landscape and Biodiversity (LRD Application)

Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
					Significant new tree and hedgerow planting – greatly in exceedance of that removed, is proposed in the landscape masterplan / scheme.
		GIB8	New Development	It is an Objective to promote and encourage planting of native tree and hedgerow species and to provide sufficient buffer to allow for wildlife corridors in new developments across the Plan area.	All tree and hedgerow planting is appropriate to the site, comprising native and adaptive tree species. No invasive species are included. Proposed planting scheme is provided with the application. Buffer zones are incorporated into the layout design of the proposed development through the retention of boundary tree lines into proposed open space areas.
		GIB9	Trees and Hedgerows	It is an Objective to: - Require that where the boundaries of sites incorporate or are adjacent to existing trees and hedgerows to be retained, these shall be utilised as part of the boundary. - Encourage the retention of hedgerows and other distinctive boundary treatments to prevent loss and fragmentation, where practically possible.	Tree and hedgerow planting is appropriate to the site, comprising native and adaptive tree species. No invasive species is included. Buffer zones are incorporated into the layout design of the proposed development through the retention of boundary and internal tree lines into proposed open space areas. The removal of trees and sections of hedgerows has been minimised and align with the structural framework of the LAP. Significant new tree and hedgerow planting – greatly in exceedance of that removed, is proposed in the landscape masterplan / scheme.
		GIB10	Sylvan Character	It is an Objective to preserve the sylvan and tree lined character of roads in the Plan area including the Ferndale Road and Allies River Road.	Allies River Road and Ferndale Road are outside the boundary of the subject site and unaffected by the proposed development, however this is noted.
		GIB11	Strategic Infrastructure	It is an Objective to: - Proposals for strategic infrastructure include an appropriate level of tree/hedgerow planting. - The provision of new strategic infrastructure is subject to environmental constraints, including those related to habitats and potential impacts such as disturbance from lighting. Examples of project level mitigation will include minimising	The application lands predominantly comprise open agricultural lands and avoid impact on aspects of Biodiversity Importance as indicated on Figure 7.1 of the LAP. The proposed development includes a new entrance off Old Connaught Avenue and road north which cross identified existing hedgerows on Figure 7.1. While these hedgerows have 'no classification' on Figure 7.1, these have been assessed in the EcIA and the arborists and the location of the proposed entrance and

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Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
				river crossings, avoiding sensitive habitats, not increasing barriers to flood waters and sustainable design and construction techniques.	road north is in accordance with the site framework established on Figure 4.1 in the LAP. The proposed development respects existing environmental constraints and incorporates existing hedgerows, an existing mature oak tree and tree lines into proposed open space, and by including new, locally appropriate planting, to maintain habitat connectivity through and around the subject site. No river crossings are proposed and lighting has been designed to best practice to avoid disturbance of habitats and species.
		GIB12	Public Realm	It is an Objective to support and promote tree planting and urban greening as part of the public realm at Old Connaught.	The proposed development incorporates mature field boundary tree lines into the proposed open space, and includes new, locally appropriate planting (to maintain habitat connectivity through and around the subject site). Planting proposals includes for establishment of a small oak grove in the local public open space within the application site. This is located close to the existing mature oak tree which is retained within proposed public open space.
Ob. 7.5.7	Rivers and Streams	GIB13	Watercourses and Riparian Corridors	It is an Objective to ensure the protection and where possible the restoration of the biodiversity associated with watercourses and their riparian (bankside) habitats, in line with the overarching objectives set out in the dlr County Development Plan 2022- 2028.	Although there are no mapped streams or rivers on the site, the project design takes account of the existing water environment. Where crossings of existing open ditches are required these are designed in a manner that maintains the open character of the existing channel.
Ob. 7.5.8	Biodiversity Led Design and Biodiversity Net Gain (BNG)	GIB14	De-Culverting	It is an Objective in accordance with the Green Infrastructure Strategy of the dlr County Development Plan 2022 - 2028 to seek opportunities where appropriate to open up culverted elements of watercourses, to facilitate weir removal where appropriate and reconnect the riverine habitats. Any such proposals shall have regard to SFRA and Appropriate Assessment requirements.	There are no known culverts within the subject site. Proposed culverts are required for the access road. This is unavoidable. All features of the existing water environment have been assessed in the EclA (and AASR) that accompanies the planning application.
		GIB15	Biodiversity Led Design and	It is an Objective that proposals for development demonstrate at pre-planning and application stage how biodiversity has informed scheme layout and design.	This is noted. The design and layout of the proposed development is in accordance with the site development framework

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Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
			Biodiversity Net Gain	Applicants are encouraged, where appropriate, to pilot the Biodiversity Net Gain Approach (BNG) for development.	establishment for the lands in the LAP and avoids impact on sites of Biodiversity importance as indicated on Figure 7.1 of the LAP. The landscape design of the proposed development takes into account the existing habitats, by maintaining the existing boundary and internal tree lines, and an existing mature oak tree as part of the open space – and by prioritising biodiversity-focussed planting / swards throughout. The removal of trees and sections of hedgerows has been minimised and align with the structural framework of the LAP. Significant new tree and hedgerow planting – greatly in exceedance of that removed, is proposed in the landscape masterplan / scheme.
		GIB16	Re-wilding and Habitat Restoration/Creation	It is an Objective to support the development and implementation of re-wilding projects using best practice under the supervision of suitably competent professional as deemed appropriate by the Planning Authority, on appropriate sites within the Plan and to promote the use of these sites for the enhancement and preservation of Biodiversity.	This is noted, although it is not proposed to re-wild this part of the Central Character Area of the LAP, the biodiversity-focussed landscape design maximised the biodiversity value of the completed development for the long-term. Elements of enhanced biodiversity have been integrated into the design of the attenuation pond.
Ob. 7.5.9	Nature Based Solutions	GIB17	Attenuation Ponds	It is an Objective to require that attenuations ponds are designed as naturalistic open features (e.g. ponds, wetlands) of value to wildlife and local amenity, with advice and input of a wetland ecologist. Their water quality and storage objectives shall be dealt with in combination with landscape integration, visual amenity and protection/enhancement of biological diversity.	Nature-based solutions are a central focus of the landscape, biodiversity and water management strategy for the proposed development. SuDS measures have been incorporated – and an attenuation area is provided. The attenuation pond has been designed to integrate with its setting and provide additional wetland habitat and biodiversity.

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Chapter 8: Open Space, Parks and Recreation

Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
Pol. 8.4.1.10	Strategic Parks and Spaces – Policy Provision	OCLAP44	Network of Strategic Parks and Spaces	It is Policy to implement the network of strategic parks and open spaces set out in Figure 8.2 and detailed in section 8.4.1. Plans, designs, detailed schedules and specifications of work for all strategic parks and spaces are to be agreed with the Local Authority.	There are no Strategic Parks or Open Space or Active Parks within the application lands. However, local public open space is provided in accordance with the requirements of the LAP. This open space allows for retention of an existing mature oak tree and for connectivity to further proposed local public open space and to the proposed Strategic Parks or Open Space or Active Parks in the surrounding / wider area.
Pol. 8.5	Public Open Space as part of Residential Schemes	OCLAP45	Public Open Space for Residential Schemes	It is Policy that a minimum of 10% of total net residential site area shall comprise public open space in new residential developments. Public open space provision for residential schemes will be based on net residential area as defined in Appendix B of the Section Guidelines 'Sustainable and Compact Settlements' (2024).	Local public open space is provided in excess of 10% within the application site in accordance with the requirements of the LAP.
Ob. 8.4.1.10	Strategic Parks and Spaces – Policy Provision	OPR1	Allies River Road Active Park	It is an Objective that an overall campus masterplan is progressed to provide a coherent framework to guide the development of Allies River Road Active Park.	A Masterplan has been prepared for the lands in the Applicant ownership.
Ob. 8.5	Connectivity and Permeability	OPR2	Public Open Space – Accessibility and Permeability	It is an Objective that all proposals for open space promote active travel and demonstrate connectivity and permeability with the wider network of sustainable movement routes across the Plan area.	There are no Strategic Parks or Open Space or Active Parks within the application lands. However, local public open space is provided in accordance with the requirements of the LAP. This open space allows for connectivity to and permeability with further proposed local public open space and to the proposed Strategic Parks or Open Space or Active Parks in the surrounding / wider area.

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Chapter 11: Phasing and Implementation

Section	Section Title	Policy / Objective No.	Pol./Ob. Header Title	Description Text	Application Response to Policy / Objective
Pol. 11.3	Old Connaught LAP Phasing Strategy	OCLAP66	Phasing Strategy	It is Policy that: • Future development, as appropriate, shall accord with the Phasing Strategy for the Plan. Planning applications shall include a 'Consistency Statement' setting out how the objectives of the Phasing Strategy, as relevant and applicable to the proposal for development, will be achieved. • Deviations from the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Plan. Any interim proposals must ensure and maintain consistency with the build-out or 'long-term' infrastructure objectives of the Plan.	The proposed development / application is within sub-phase 1 of Phase A as set out in Chapter 11 of the LAP and is fully in accordance with the phasing requirements of the LAP.

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