ARMSTRONG
FENTON
ASSOCIATES

PROJECT:

Proposed Large-scale Residential Development (LRD) in the townlands of Bohernabreena, Oldcourt & Killininny, Dublin 24.

APPLICANT:

Capami Ltd.

REPORT:

Statement of Response to South Dublin County Council LRD Opinion Ref. LRDOP001/24.

DATE: **September 2024.**

Planning &
Development
Consultants

Table of Contents Page

1.0. Introduction 3
2.0. Response to South Dublin County Council LRD Opinion Ref. LRDOP001/24. 4
3.0 Conclusion 20

1.0. Introduction

1.1. On 24th January 2024, Armstrong Fenton Associates, Planning Consultants, on behalf of Capami Ltd ("The Applicant") submitted a pre-application consultation request to South Dublin County Council (hereafter "SDCC"). The purpose of this document is to respond to the specific information requested by SDCC in their Notice of Pre-Application Consultation Opinion (Ref. LRDOP001/24), further to a meeting held on 1st March 2024 with SDCC and the Applicant/Design Team.

1.2. This Notice, received on 28th March 2024, states that it is the opinion of the Planning Authority that taking into account the discussion held at the S.32C LRD Meeting, and the particulars received for the purpose of that meeting, *"it is the conclusion of the Planning Authority that the submitted particulars alone and in their present form* ***do constitute a reasonable basis*** *for making an LRD planning application, subject to further consideration and amendment based on the recommendations and assessment contained in this report".*

1.3. The Planning Authority has set out key issues / areas that must be addressed in the application documents that could result in the proposal constituting a reasonable basis for making an application, and advised that the LRD application be accompanied by:

- *"A statement of response to the issues in the LRD Opinion*
- *A statement that in the applicant's opinion, the proposal is consistent with the relevant objectives of the development plan".*

1.4. A response to the items raised in the Planning Authority's Opinion is set out throughout this document. This LRD application is also accompanied by a Statement of Consistency (submitted as a separate document) which outlines the proposed development's compliance with national, regional and local planning policy, including the relevant South Dublin County Development Plan, 2022-2028.

2.0. Response to South Dublin County Council LRD Opinion Ref. LRDOP001/24.

The detailed assessment within the LRD Opinion identifies areas in which the particulars submitted under S.32B of the Act are lacking or those issues which remain to be reconsidered or addressed by the applicant in any documents submitted in a future planning application. These items are summarised as follows:

2.1 Item 1. Density

The density of the development should be increased in line with the 40 – 80 dph density range for City – Suburban/Urban Extension sites as specified in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024.

Response:

The site is subject to several well-known physical constraints, including its sloping topography, the presence of Irish Water and ESB wayleaves, dense hedgerows, and streams, with the current proposal also having to balance the need to cater for an aesthetically pleasing housing development that provides for an appropriate level of density and ensures the visual impact on views to the Dublin mountains are minimised.

The proposed layout is based upon the principles of DMURS, as confirmed by the submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers, and good urban design, as set out in the submitted Architectural Design Statement, and provides a good mix of dwelling typologies and variations in building design.

The proposed layout provides for a mix of terraced, semi-detached, and detached houses, pepper-potted with low-rise apartment and duplex buildings at key locations to provide recognisable local landmarks, good urban street frontage and an appropriate level of variety and distinctiveness. Furthermore, the proposed development of 523 no. dwellings, provides a net density of 42 units per hectare across the entire site, and represents an efficient density for this zoned, serviced, site, having regard to the guidance set out in the Sustainable Residential Development and Compact Settlements Guidelines, 2024.

We refer the reader to section 5.3 of the submitted Statement of Consistency for details of how the proposed development complies with the requirements of the Sustainable Residential Development and Compact Settlements Guidelines, 2024, however, this section sets out a synopsis of same.

The proposed development is located within the Metropolitan Area of Dublin City, albeit it on the edge of the urban built up area and, as per these Guidelines i.e. Table 3.1 of same, the site is considered to be categorised as a "City – Suburban/Urban Extension" site, given its greenfield nature at the edge of the existing built-up area of South Dublin. In accordance with Table 3.1, densities in the range of 40 dph to 80 dph shall be shall generally be applied at suburban and urban extension locations in Dublin. This is affirmed by the Planning Authority in their LRD opinion issued under Ref. LRDOP001/24 for the subject proposal which states: *"Given the sites location, at the foothills of the Dublin Mountains, densities within the lower end of the range of 40-80 dph are considered more appropriate for the site, reflective of the character of the surrounding area and allow for better sympathetic integration with the rural setting of the lands".*

The site is also located in an "Intermediate Location" as it is currently within a 1-2km walking distance of existing public transport services, with the proposed east-west main link street accommodating 2 no. future bus stops that may provide future public transport (bus) services, as agreed with the NTA.

Taking into account the site's status as a "City – Suburban/Urban Extension" and an "Intermediate Location", as per Tables 3.1 and 3.8 respectively of the Sustainable Residential Development and Compact Settlements Guidelines, 2024, the appropriate density to be applied to the development of the subject lands is in the range of 40 to 80 units per hectare net.

Appendix B of the aforementioned guidelines provides guidance in how to measure residential density and states that a net site density measure includes areas that will be developed for housing including local streets, private and semi-private open space, car and bicycle parking areas as well as other storage areas, local parks and incidental areas of open space and landscaping. However, the net density calculation / measure excludes major roads / streets, land used for commercial development, schools, large parks, wayleaves or rights of way and other lands that cannot be developed due to environmental sensitivities, topographical constraints and/or are subject to flooding.

In accordance with Appendix B of the aforementioned Guidelines, the following sets out how the net density of the proposed development has been calculated and therefore put forward for permission.

It is considered appropriate that the area of the main link street traversing the development, which will ultimately connect Oldcourt Road (the R113) to Bohernabreena Road (L7114), is discounted from the gross site area as it is a major road / Link Street.

It is also considered appropriate to discount areas of environmental sensitivities that cannot be developed on the subject site such as identified hedgerows of biodiversity importance that are to be retained for green infrastructure functions, and also areas that incorporate sustainable surface water treatment / drainage through the creation of bioretention ponds. It is also considered that the proposed bio-retention park can be discounted for density purposes because it is a vital ecological function, it acts as a sustainable stormwater management system, helping to mitigate the effects of water runoff.

Taking into account the details set out in Table 1 of Appendix B, in determining what areas of the gross site area of the subject site, i.e. 20.4Ha, can be discounted, in order to calculate both the net developable area and the corresponding net density of the proposed development, the following factors have been discounted:

- Area occupied by the proposed east-west main link street that traverse the site and will connect Oldcourt Road to Bohernabreena Road, as identified in the CDP Six Year Road Programme and on zoning map no. 9 – this area equates to 8,214sq.m.

- Areas occupied by wayleaves accommodating ESB overhead wires/pylons and Irish Water/Uisce Éireann watermains – this area equates to 43,531.1sq.m.

- Areas of environmental sensitivities that cannot be developed, i.e. protection of hedgerows and ditches, buffers from the top of the bank of any streams and watercourses on the site, wetland areas/bio-retention areas etc. – this area equates to 27,664.5sq.m.

- Total area excluded from gross site area is 79,409.6sq.m / 7.94Ha.

- Net developable area is therefore 12.46Ha (i.e. 20.4Ha – 7.94Ha = 12.46Ha).

- Resultant net density = 523 no. units / 12.46Ha = 42 units per hectare net.

We note that in the LRD Opinion issued by the Planning Authority (under Ref. LRDOP001/24) the following is stated in relation to the calculation of net density: *"the Planning Authority accepts the exclusion of (i) high-voltage power lines and mandated no- build areas to same (ii) the link road, including street trees to verge and footpath as well as*

(iii) identified hedgerows of biodiversity importance that are to be retained for green infrastructure functions". Based upon this feedback, the above calculation has been prepared and represents the only factors that have been calculated to achieve the net density of development that is now put forward for permission. In addition, we submit drawing no. MP09 "Overall Lands – Proposed Density Map", prepared by Davey + Smith Architects, which identifies the areas within the red line boundary of the subject LRD planning application that have been discounted to calculate the net density of the proposed development – please refer to same.

We also note that the Planning Authority stated the following in their LRD Opinion for the proposed development (under Ref. LRDOP001/24): *"Given the sites location, at the foothills of the Dublin Mountains, densities within the lower end of the range of 40-80 dph are considered more appropriate for the site, reflective of the character of the surrounding area and allow for better sympathetic integration with the rural setting of the lands*". Furthermore, the LRD Opinion also states: *"The Planning Authority is committed to supporting development at appropriate densities throughout the county in accordance with the ranges specified in the Guidelines".*

All of the County Development Plan and Ballycullen-Oldcourt LAP requirements and design caveats have been prioritized in the proposed design and layout and it is fully considered the proposed development achieves the optimal response to the locational context of the subject lands, creating a soft transition between the suburbs and countryside, the setting of the Dublin mountains protected, and a coherent development which integrates with the existing and permitted residential development on adjoining lands.

Taking all of the foregoing into account, the net developable area of the subject site equates to 12.46Ha, thus producing a net density of 42 units per hectare which accords with the density range of 40 to 80 units per hectare net as defined in the Sustainable Residential Development and Compact Settlements Guidelines, 2024. In addition, the proposed density of 42 units per hectare accords with the Planning Authority's request that the density of the development should be in line with the 40 – 80 dph density range for City – Suburban/Urban Extension sites as specified in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024, and at the lower end of this prescribed density range.

2.2 Item 2. Car Parking

Reduction in the level of perpendicular car parking provided along the link road. Car parking should be relocated off the link road, within residential blocks. Perpendicular parking may be acceptable

Response:

Perpendicular car parking spaces along the proposed main link street has been removed. Perpendicular spaces have been replaced by parallel spaces. Additional car parking has been relocated off the main link street, within the residential blocks.

Please refer to the submitted Pinnacle Consulting Engineers Drawing No.s P211102-PIN-XX-DR-D-101-S1 **to** P211102-PIN-XX DR-D-104-S1 for further details.

2.3 Item 3. Design of Link Road

Amendments to the design of the link road in accordance with the Cycle Design Manual and DMURS, in particular to provide a two-way cycle track continually through the site on one side of the road and to provide lay-by bus stops.

Response:

A meeting was held with National Transport Authority (NTA) and South Dublin County Council (SDCC) on 16th May 2024. At this meeting, a discussion took place, amongst other things, regarding amendments to the design of the proposed main link street / Link Road in accordance with the Cycle Design Manual and DMURS.

The first part of the discussion focused on the revised two-way cycle track that runs continually through the site on one side of the road. The NTA also required the upgrade of the vehicular crossings to be compliant with Cycle Design Manual. This is shown on the submitted Pinnacle Drawing No.s:

- P211102-Pin-Xx-Dr-D-101-S1-P01 **to** P211102-Pin-Xx-Dr-D-104-S1-P01
- P211102-PIN-XX-DR-D 155-S1-P02-Typical Cycle Path Details GA.

It was also the NTA preference to limit the number of vehicular access points to Dodderbrook, which is located to the north of the subject lands. As a result, a vehicular access to Dodderbrook has been changed to a filtered access for pedestrians and cyclists only, i.e. connecting into Dodderbrook Avenue.

Refer to the following Pinnacle Consulting Engineers Drawings which fully implemented the feedback received from the National Transport Authority:

- P211102-Pin-Xx-Dr-D-104-S1-P01- General Layout Sheet 4 of 4
- P211102-Pin-Xx-Dr-D-156-S1-P01- Typical Cycle Path Details -Cross Section
- P211102-Pin-Xx-Dr-D-157-S1-P01- Typical Cycle Path Details - Construction Details
- P211102-Pin-Xx-Dr-D-155-S1-P01- Typical Cycle Path Details GA

Finally, it was agreed with the NTA that no bus stops would be included in the planning application as there are currently no plans to service the Link Street. Instead, the NTA requested that a footprint of a bus stop be included in the planning application to allow for future retrofitting of a bus stop if and when one is required. There are 2 no. east bound, and west bound bus stops allowed for as part of the proposed roads design.

Refer to the following enclosed Pinnacle Consulting Engineers Drawing no. P211102-Pin-Xx-Dr-D-190-S1-P01-Future Bus Stops which illustrates possible future bus stop layouts along the proposed main link street.

2.4 Item 4. Hedgerows

Reduction in the fragmentation of hedgerow by ensuring all hedgerow is maintained in public open space areas and reconfiguration of pathways to minimise impacts to existing hedgerow. Revision to design of Oldcourt Park to minimise impacts to existing hedgerow. Hedgerow should not be provided in any private open space areas and should not form the site boundary of any single dwelling.

Response:

Hedgerows are to be retained to the greatest extent possible, with removal considered only where necessary for the implementation of larger connecting structures, such as the proposed east-west main link street, which is a Development Plana and Local Area Plan objective.

As confirmed in the submitted Landscape Design Rationale, approximately 28,870.9sq.m of hedges are to be retained and maintained as part of the proposed development. These have been incorporated into the proposed landscape design with appropriate buffers around same provided for.

Fig. 1 – Proposed Hedgerow Retention and Removal

The integration and preservation of hedgerows are integral to the soundscape concept applied to the overall landscape design concept for the proposed development, creating an environment where the sounds of birds, rustling leaves, and flowing water can be enjoyed. The overarching goal is to strike a balance between connectivity and environmental preservation, crafting a cityscape that actively supports biodiversity and provides a serene experience.

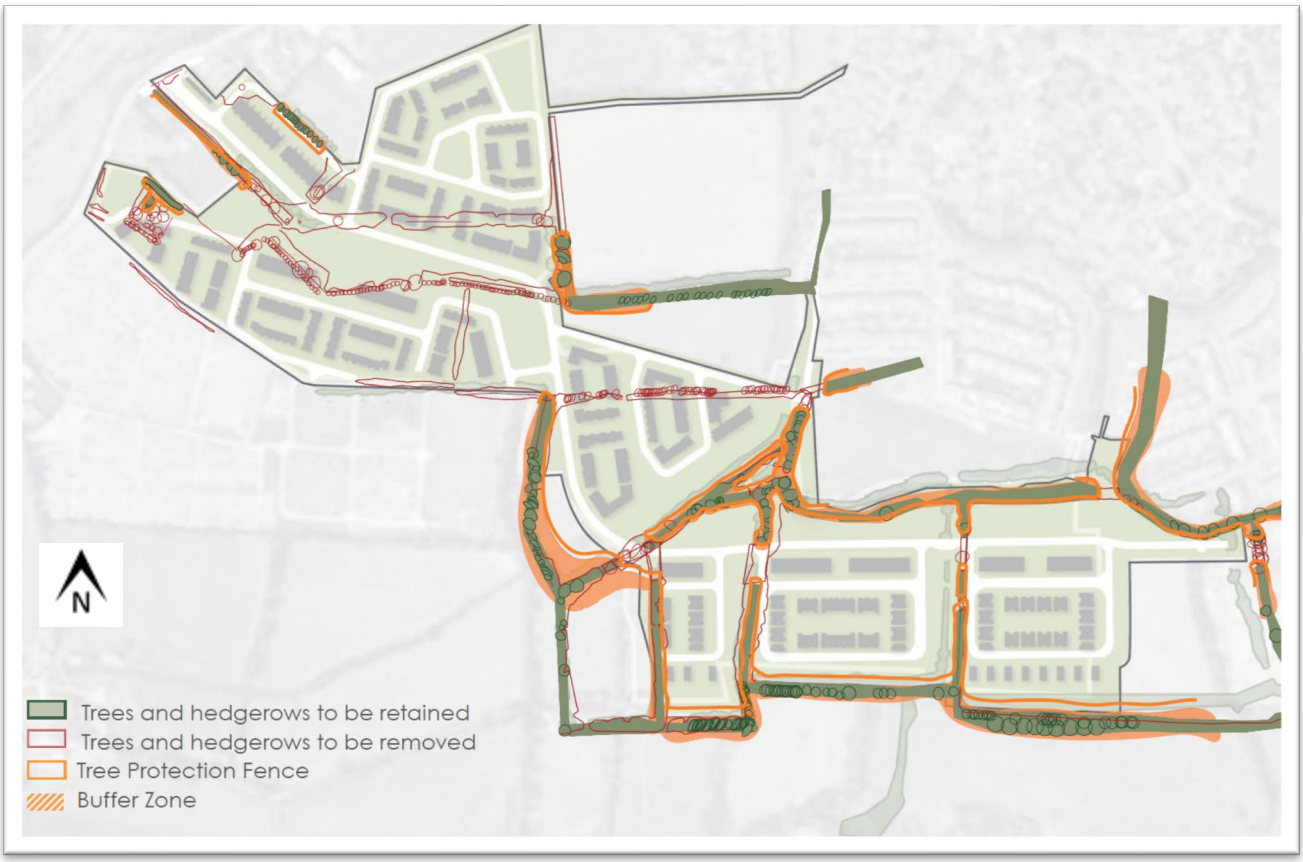

Fig. 2 – Proposed Hedgerow Retention, Protection and Removal

As part of the landscape proposal, it is proposed that the existing trees and hedgerows will receive rigorous protection, including the implementation of a 10-meter protection zone around them.

The role of hedgerows as wildlife habitats and biodiversity corridors are respected, preserving their visual, historical, and cultural value throughout the landscape project, complying with Objectives NCBH11 4 and GI2 5 of the Development Plan.

The necessary hedgerows will be removed gradually over time, avoiding abrupt interventions. This approach aims to allow the animals to move around safely and to progressively improve the quality of the natural environment. By adopting a phased cutting strategy, Gannon & Associates, Landscape Architects assert that this allows for the preservation of the health and vitality of the existing hedgerows.

In areas where hedgerows are fragmented or of low quality, efforts will be made to enhance them. This process may include planting native species, improving the soil quality, and connecting isolated fragments to form continuous corridors.

Another green infrastructure strategy applied to the proposed landscape design is to utilise the existing fragmentation of hedgerows to create strategic pathways in the landscape character area of “Oldcourt Park”. The hedgerows, which already served as natural corridors, were incorporated into the plan to connect habitats and support the movement

of local wildlife. This approach not only preserves the park's natural features but also enhances the area's environmental sustainability by turning the pre-existing fragmentation into an advantage for the project.

Fig. 3 – Proposed Hedgerow Retention in Oldcourt Park

It is evident from the landscape design proposal for Oldcourt Park that the retention and incorporation of hedgerows throughout is a critical design feature. Please refer to the enclosed landscape design proposals and design rational prepared by Gannon & Associates, Landcape architect for further details.

There are no existing hedgerows in the curtilage of any proposed dwellings as part of the overall development.

2.5 Item 5. Connections to Adjoining Lands

Additional connections to adjoining lands should be sought, in particular pedestrian and cycle links and an additional route through 'OS' lands connecting to Ely View. Details of all connections should be provided, to confirm connectivity of all routes and a permeability map should be submitted.

Response:

The proposed development includes the provision / completion of the east-west main link street, connecting Oldcourt Road to the east with Bohernabreena Road to the west, thus realising a Development Plana and Local Area Plan objective for these lands.

From this main route, various secondary routes have been designed and integrated for both vehicles and pedestrians/cyclists. This creates a comprehensive network of access, facilitating movement and interaction between different areas of the proposed development. Moreover, connectivity goes beyond logistical efficiency; it extends to the user experience. Thoughtfully planned pathways, coupled with well-designed elements, intuitively guide visitors, fostering an accessible, enjoyable, and harmonious experience throughout the space.

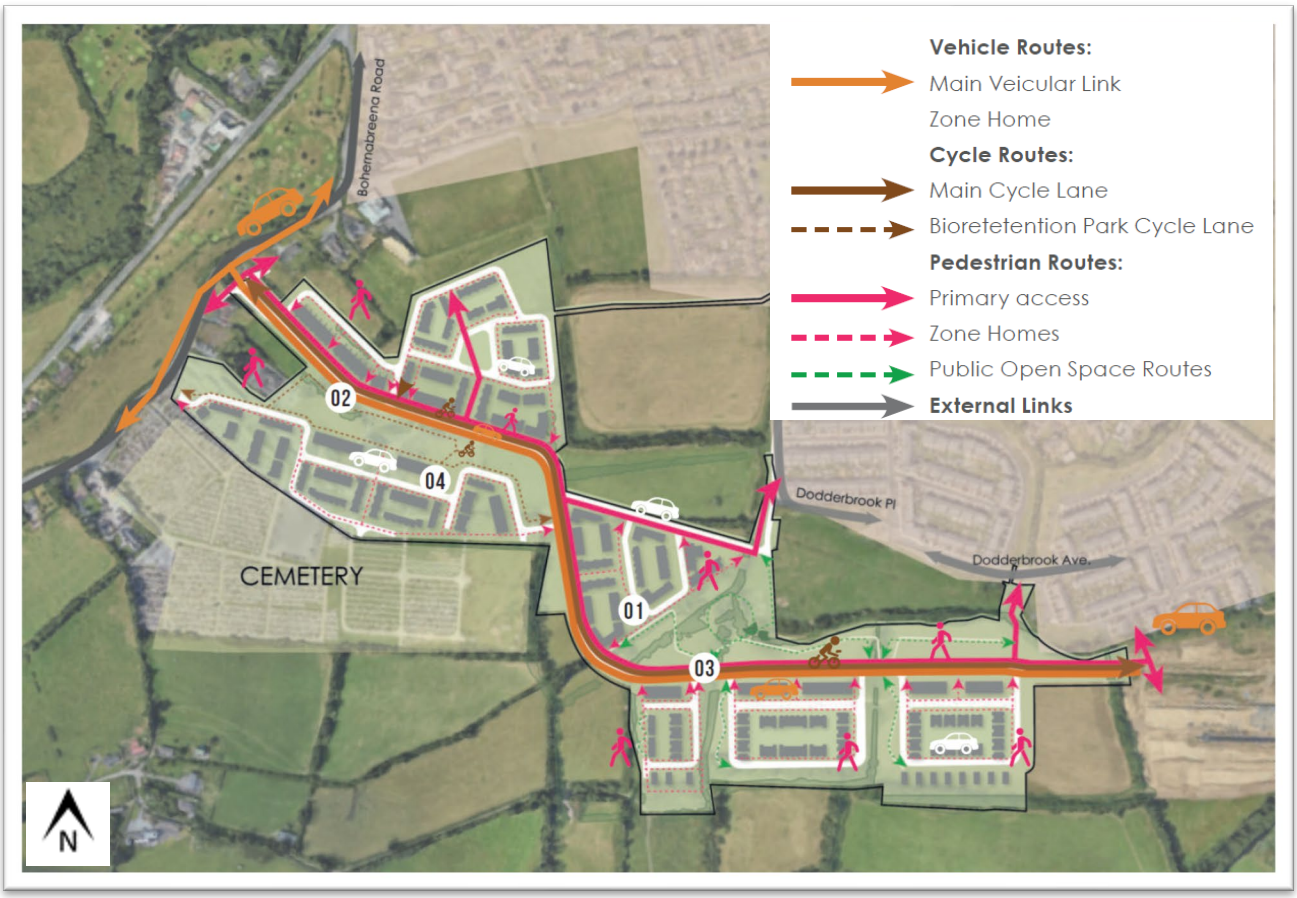

Fig. 4 – Proposed Connectivity

Vehicular access from the proposed development into Dodderbrook to the north, at Dodderbrook Place is proposed. In addition, pedestrian and cyclist access only is catered for into Dodderbrook Avenue. The proposed east – west main link street includes dedicated pedestrian and cyclist paths thus affording ease of access throughout the entire scheme and onwards to Oldcourt Road and Bohernabreena Road and beyond. In Neighbourhood Zone 3 to the north, a pedestrian / cyclist access point into St. Anne's GAA Club is afforded, to be delivered in a agreement with the GAA Club. Figure 4 illustrates the permeability map, a larger version of same is enclosed in the Landscape Design Rationale prepared by Gannon & Associates, Landscape Architects (refer to 6.3.1, page 69).

The red line of application (save for the facilitation of a proposed sewer) does not provide for development near or abutting Ely View, and therefore connections into same are not proposed as part of this current development proposal. However, as per section 7.5 of the enclosed Planning Statement which addresses the overhead ESB power lines and the possible future development options for same, and as per the submitted Davey+Smith drawing no. MP17, which illustrates the proposed LRD, alongside potential future development on the applicant's adjoining lands should the overhead wires be relocated southwards, should this occur in the future, an application for permission for could accommodate *pedestrian and cycle links to Ely View.*

2.6 Item 6. SuDS Strategy

Flow route analysis and conveyance plan required to inform SuDS strategy at the site which maximises above ground, natural, attenuation.

Response:

A pre-development flow route analysis was completed and issued to Brian Harkin of South Dublin County Council Water Services by Pinnacle Consulting Engineers on 25th July 2024, prior to the planning submission. Please also refer to their enclosed drawing no. P211102-PIN-XX-XX-DR-C-00220-S2 - PRE-DEVELOPMENT FLOW ROUTE ANALYSIS, and to their submitted drawings and reports.

2.7 Item 7. Water Services

Engage directly with Water Services to agree proposals relating to the diversion of the 450mm surface water sewer

Response:

During the aforementioned meeting with the SDCC Water Services division, it was discussed and agreed in principle, that the diversion was required to facilitate the new proposed development. Furthermore, said diversion should remain piped, as it is currently, ensuring that the same capacity is provided. The pipe would remain piped rather than be discharged into an open ditch within the boundary of the proposed development, which would create a surface water flood risk if the upstream network's discharge in the pipeline was not attenuated.
Overall, it was proposed that the diversion remain piped in order to limit risk of flooding and where possible, all bends shall be approximately 45 degrees, limiting the junction losses on the pipeline.

The proposed diverted surface water pipeline is setback a minimum of 5m from all proposed structures.

It is also noted that the proposed development drainage is not interconnected to said diverted pipeline, so that the surface water quantity and quality of the upstream lands are entirely separated from the proposed development.

The proposed diversion was issued to SDCC drainage department for comment prior to submission for planning.

Please refer to the enclosed Pinnacle Consulting Engineers Drawing no.s:

- P211102-PIN-XX-XX-DR-C-00210-S2 – Surface Water Diversion Layout
- P211102-PIN-XX-XX-DR-C-00211-S2 – Surface Water Diversion Proposed Longsection

2.8 *The LRD Opinion also sets out* ***Specified Information required in addition to Article 23 of the Planning and Development Regulations (as per Article 16A(7))***
The below list advises on particulars required, echoing and in addition to those particulars provided for the purposes of the LRD Meeting, or particular issues which may need to be addressed as part of those particulars.

Response:

We confirm that the following required documents are also enclosed as part of this LRD planning application:

Item	Item Required	Method of Response
1	Housing Quality Assessment	A Housing Quality Assessment (HQA) has been prepared by Armstrong Fenton Associates and is enclosed.
2	Schedule of Accommodation: a) To include adequate information in relation to the calculation of Development Contributions	Please refer to the submitted HQA and the separate "Planning Stats". Please also refer to section 7.7 "Dwelling Mix" of this Planning Statement which provides a breakdown of the proposed schedule of accommodation and corresponding floor areas, thus facilitating the associated Development Contributions to be calculated.
3	Architect's Design Statement a. To include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan) b. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in South Dublin County's Height and Density Guide	Please refer to Section 4 of the submitted Architectural Design Statement prepared by Davey + Smith Architects for details on how 'The Plan Approach' has been followed. Please also refer to section 6 of the Architectural Design Statement which provides an analysis of how the proposed development has had regard to the performance-based design criteria set out in South Dublin County's Height and Density Guide. Please also refer to section 4.1.5.1 of the enclosed Planning Statement which demonstrates how the proposed development complies with "The Plan Approach" as set out in the Development Plan.
4	Detailed CGI's of development during summer and winter (trees	We enclose CGIs of the proposed development, along with photomontages prepared in conjunction with the Landscape Visual Impact

	with and without leaves), with views from sensitive nearby receptors	Assessment (Chapter 15 of the submitted EIAR), prepared by Macroworks – please refer to same.
5	Traffic and Transport Assessment **a.** Updated to include current public transport routes serving the site. **b.** Capacity study of routes serving the site. **c.** All drawings within report to be consistent with final proposal. d. Traffic assessment and traffic counts of the junctions particularly to the west, determining the junction capacity and justification for the junction type.	Pinnacle Consulting Engineers have prepared the submitted Traffic & Transport Assessment – please refer to same for full details.
6	Sunlight and Daylight Analysis for all proposed dwellings and assessment of any potential nearby dwellings that may be affected by the development	CS Consulting has prepared the submitted Daylight / Sunlight Assessment – please refer to same.
7	Green Infrastructure Plan	Gannon & Associates, Landscape Architects have prepared a Green Infrastructure Strategy / Plan for the proposed development which is set out in section 6.2.3 of the enclosed Landscape Design Rationale report – please refer to same.
8	Green Space Factor Calculations	Please refer to section 7.3 (page 80) of the enclosed Landscape Design Rationale report prepared by Gannon & Associates, Landscape Architects which sets out the Green Space Factor Calculations for the proposed development.
9	Street Tree Planting Plan	Gannon & Associates Landscape Architects have incorporated street trees into the landscape design of the proposed development, details of which are set out in section 5.1 (page 52) of the submitted Landscape Design Rationale. There are 4 no. "Landscape Detail Area" drawings also enclosed, on which street trees can be identified – please refer to these drawings. Please also refer to section 7.1 of the submitted Landscape Design Rationale for the details of the overall planting plan.
10	Landscape Scheme, to include: a. Planting Plan: i. Location of species, types of plants, planting sizes and proposed numbers/densities,	Gannon & Associates ,Landscape Architects have prepared the enclosed planting plan – refer to drawing no. 23130_LP_E_SLP "Soft Landscape Plan". Please also refer to section 7.1 of the enclosed Landscape Design Rationale for a full planting schedule.

	ii. Implementation timetables, iii. Proposals for future maintenance/management.	Please refer to section 8.1 of the enclosed Landscape Design Rationale for details of planting, management and maintenance of the open spaces.
11	Tree and Hedgerow Protection Plan	Arborist & Associates have prepared the submitted Arboricultural Assessment and Tree Protection Plan, set out across 4 no. drawings – please refer to same.
12	Play – detailed design of play areas, including items of equipment to be included	Gannon & Associates, Landscape Architects, in their submitted Landscape Design Rationale, have provided details on play specification for both natural play and fitness/equipment – refer to section 7.5 of same.
13	Ecological Impact Assessment	Please refer to Chapter 5 "Biodiversity", prepared by Enviroguide Consulting, of the enclosed EIAR which provides the Ecological Impact Assessment of the proposed development.
14	Road Safety Audit	A Stage 1 & 2 Road Safety Audit, prepared by Bruton Consulting Engineers is enclosed.
15	Details for covered outdoor bicycle parking	Please refer to the submitted Davey + Smith drawing no. MP22 "Overall Lands - Proposed Bikes Location" for details of the various types of proposed covered bicycle parking and locations of same throughout the site.
16	Layout Plans, not less than 1:200 scale to show: **a.** Road cross sections detailing carriageway/footpath/cycle widths. All drawings to be fully dimensioned to include but not limited to road & footpath widths, 6m reversing distance, kerb radii, relevant offsets. Steep sections of footpaths and cycle lanes should be avoided. **b.** All of the developments access junctions, showing the carriageway dimensions and junction type and provision of a visibility splay. **c.** Location and design of all pedestrian crossings within the development.	Please refer to the following details submitted as part of the LRD planning application: **a. & b.** All of the developments access junctions, showing the carriageway dimensions and junction type and provision of a visibility splay are illustrated in the submitted Pinnacle Consulting Engineers Drawing No.s: ▪ P211102-PIN-XX-DR-D-101-S1 **to** ▪ P211102-PIN-XX-DR-D-104-S1, which are the General Layout Sheets 1, 2, 3 & 4 ▪ P211102-PIN-XX-DR-D-110-S1 **to** P211102-PIN-XX-DR-D-113-S1, which are the Sightlines Sheets 1, 2, 3 & 4 **c**. The location and design of all pedestrian crossings within the development are illustrated in Pinnacle Consulting Engineers Drawing No.s: ▪ P211102-PIN-XX-DR-D-101-S1 **to** ▪ P211102-PIN XX-DR-D-104-S1, which are the General Layout Sheets 1, 2, 3 & 4 ▪ P211102-PIN-XX-DR-D-151-S1-P01 – Standard Zebra Crossing Detail

	d. Swept Path Analysis demonstrating that fire tenders and large refuse vehicles can access/egress the site.	**d.** Swept Path Analysis demonstrating that fire tenders and large refuse vehicles can access/egress the site are illustrated in Pinnacle Consulting Engineers Drawing No.s: ▪ P211102-PIN-XX-DR-D-120-S1 **to** P211102-PIN-XX-DR-D-123-S1 which are the Autotrack Layouts for Fire Tender drawings i.e. sheets 1 - 4. ▪ P211102-PIN-XX-DR-D-130-S1 **to** P211102-PIN-XX-DR-D-133-S1 which are the Autotrack Layouts for Refuse Vehicle drawings i.e. sheets 1 - 4.
	e. Autotrack/swept path analysis for the bus routes along the link street, ensuring adequate widths at bends/junction.	**e.** Autotrack/swept path analysis for the bus routes along the link street, ensuring adequate widths at bends/junction are illustrated in Pinnacle Consulting Engineers Drawing No.s: ▪ P211102-PIN-XX-DR-D-134-S1 **to** P211102-PIN-XX-DR-D-137-S1 which are the Autotrack Layouts for Bus drawings i.e. sheets 1 - 4.
	f. Location of the refuse collection points.	**f.** Refer to the enclosed Davey + Smith Drawing no. MP24 "Overall Lands – Proposed Bin Collection Points".
	g. Taking in Charge Plan, including areas to be maintained by a management company.	**g.** Refer to the enclosed Davey + Smith Drawing no. MP08 "Overall Lands – Proposed Taking in Charge Map".
	h. Detailing the autotrack and visibility splay of vehicles entering and exiting the development.	**h.** All of the developments access junctions, showing the carriageway dimensions and junction type and provision of a visibility splay are illustrated in the submitted Pinnacle Consulting Engineers Drawing No.s: ▪ P211102-PIN-XX-DR-D-101-S1 **to** ▪ P211102-PIN-XX-DR-D-104-S1 which are the General Layout Sheets 1, 2, 3 & 4 ▪ P211102-PIN-XX-DR-D-110-S1 **to** P211102-PIN-XX-DR-D-113-S1, which are the Sightlines Sheets 1, 2, 3 & 4
	i. Details of the footpath layout for the development these shall provide adequate connectivity around the development and to existing developments/estates particularly in the north.	**i.** Details of the footpath layout for the development which will provide connectivity around the development and to existing developments/estates including Dodderbrook to the north are illustrated in Pinnacle Consulting Engineers Drawing No.s: ▪ P211102-PIN XX-DR-D-101-S1 General Layout Sheets ▪ P211102-PIN-XX-DR-D-104-S1 General Layout Sheets ▪ P211102-PIN-XX-DR-D-170-S1 Future Connections
	j. Show all proposed future link roads constructed to the boundary to ensure no "ransom Strips" remain to inhibit potential development. The layouts should match the existing footpaths/infrastructure.	**j.** The submitted plans do not include any ransom strips, with all road's proposal tying into adjoining developments where proposed, and / or, where necessary, brought up to the boundary of the application site.

	k. Location of 20% EV charging car parking spaces **l.** A total of 5% Mobility Impaired Car Parking Spaces	**k. & l.** The detailed architects site layout plans incorporate 20% EV parking spaces and 5% mobility impaired car parking spaces – please refer to the submitted Davey+Smith drawing no.s MP18, MP19, MP20 & MP21.
17	SUDs Strategy, to include: **a.** SUDs Design details **b.** Flow route analysis for site. **c.** Comprehensive surface water conveyance plan for the site **d.** Drawing showing how much surface water is attenuated in m³. **e.** Revised report showing surface water attenuation calculations for proposed development. **f.** Revised calculation reports showing increased surface water attenuation provided and show calculations for same. Examine if additional surface water attenuation can be provided in green areas and by means of	**a.** Please refer to Section 7.3 "SuDS Strategy" of the submitted Engineering Assessment Report prepared by Pinnacle Consulting Engineers for details. **b.** Refer to the submitted drawing no. P211102-PIN-XX-XX-DR-C-00220-S2 – "Pre-Development Flow Route Analysis" prepared by Pinnacle Consulting Engineers for details, which was completed and issued to Brian Harkin of South Dublin County Council Water Services on the 25th July 2024, prior to the lodgement of this LRD planning application. **c.** Refer to the submitted drawing no. P211102-PIN-XX-XX-DR-C-00221-S2 – "Post-Development Route Analysis" prepared by Pinnacle Consulting Engineers for details. A piped surface water conveyance system has been added to the design as a redundancy and shall only be engaged by the overtopping or bypassing upstream SuDS features, or in areas where SuDS measures are not viable. The piped conveyance network will seek to capture any surface water that has potentially bypassed or exceeded the SuDS features capacity and discharge the surface water at a safe strategic outlet location via an attenuation basin, reducing the risk of overland flooding. Furthermore, the roads throughout the development have been designed as overland flow routes for exceedance events in which the surface water shall still be conveyed to the attenuation basins. **d.** Refer to the submitted drawing no. P211102-PIN-XX-XX-DR-C-00610-S2 - "Surface Water Catchment Layout – Overall Layout" prepared by Pinnacle Consulting Engineers for details. **e.** Refer to the enclosed Engineering Assessment Report Part 2 - Appendices for the surface water attenuation calculations. **f.** All surface water is to be attenuated by using SuDs with no underground tanks proposed. The proposed surface water design concept intends to employ SuDS drainage measures to manage the post-development surface water runoff in such a manner that the urban drainage network mimics the natural drainage process as far as possible, limiting the impact on the downstream receiving environment. The proposed system intends to manage surface water runoff within the development to ensure there is no increased risk of flooding on or downstream of the subject site.

	SuDS (Sustainable Drainage Systems).	All existing ditches on the site, of function and purpose to the wider surface water network within the region, have been maintained across the site, with road crossing culverts provided to maintain function of the existing watercourses. The post-development surface water design shall capture and treat surface at source where possible, the conveyance system shall drain surface water northwards and discharge in existing ditches, in line with the pre-development runoff condition on the site. Refer to the enclosed Engineering Assessment Report Part 2 - Appendices for the surface water attenuation calculations.
	g. If underground tanks present, why these cannot be excluded from the design.	**g.** There are <u>no underground tanks</u> proposed as part of the overall development proposal. It is proposed that the surface water from the proposed development will be captured by various nature-based sustainable urban drainage systems (SuDS) interventions over the use of a conventional gully and piped surface water network, as guided by the SDCC Sustainable Drainage Explanatory Design & Evaluation Guide 2022.
	h. SUDs Layout identifying the different types of SUDs features.	**h.** Refer to the following enclosed drawings prepared by Pinnacle Consulting Engineers for the Suds Drainage Layout: ▪ P211102-PIN-XX-XX-DR-C-00600-S2 – SUDS Drainage Layout – Overall Layout ▪ P211102-PIN-XX-XX-DR-C-00601-S2 ▪ P211102-PIN-XX-XX-DR-C-00602-S2 ▪ P211102-PIN-XX-XX-DR-C-00603-S2 ▪ P211102-PIN-XX-XX-DR-C-00604-S2 ▪ P211102-PIN-XX-XX-DR-C-00605-S2 ▪ P211102-PIN-XX-XX-DR-C-00606-S2 which are the various SuDS Drainage Layouts Sheets 1-6.
	i. Demonstrate adherence to SDCC SUDs guidance.	**i.** Refer to the enclosed Engineering Assessment Report and associated SuDS drawings for details.
	j. Drawing showing plan and cross-sectional views of all SuDS features	**j.** Refer to the following enclosed drawings prepared by Pinnacle Consulting Engineers for the Suds cross sections drawings: ▪ P211102-PIN-XX-XX-DR-C-00640-S2 **<u>to</u>** P211102-PIN-XX-XX-DR-C-00648-S2 which are the various surface water attenuation sections - Sheets 1-9 In addition, please also refer to the following submitted drawings: ▪ P211102-PIN-XX-XX-DR-C-00631-S2 **<u>to</u>** P211102-PIN-XX-XX-DR-C-00636-S2 which are the various surface water drainage long sections - Sheets 1-6.

18	SUDS Management Plan	Pinnacle Consulting Engineers have prepared the enclosed SuDS Maintenance Manual – please refer to same.
19	Confirmation of Feasibility from Irish Water	A Confirmation of Feasibility has been received from Irish Water, Ref. CDS23009245, dated 12th August 2024, and is enclosed in the submitted Engineering Assessment Report Part 2 – Appendices.
20	Appropriate Assessment Screening Report	Enviroguide Consulting has prepared the submitted Appropriate Assessment Screening Report and Natura Impact Statement, please refer to both reports.
21	Environmental Impact Assessment Report (EIAR)	An Environmental Impact Assessment Report (EIAR) has been prepared and is enclosed – please refer to same.
22	Archaeological Impact Assessment and Method Statement	Please refer to Chapter 14 "Archaeology & Cultural Heritage", prepared by Archaeology Plan, of the submitted EIAR.
23	Building Lifecycle Report	A Building Lifecycle Report has been prepared by Armstrong Fenton Associates and is enclosed.
24	Community and Social Infrastructure Audit	Please refer to the submitted Social Infrastructure Assessment, prepared by Armstrong Fenton Associates.
25	Part V Proposals	Please refer to the submitted Part V proposal, prepared by PK O'Brien & Associates, as well as the associated Part V drawings prepared by Davey + Smith Architects. The applicant proposes to deliver 95 no. units to satisfy their Part V obligation associated with the proposed development.
26	Public lighting plan	Please refer to the submitted public lighting proposals/plans prepared by Renaissance Engineering.

3.0 Conclusion

3.1 It is considered that the LRD planning application now submitted to South Dublin County Council for assessment appropriately addresses all the issues raised in the SDCC LRD Opinion (Ref. LRDOP001/24) and contains all of the requested items of specific information as appropriate.

3.2 Having regard to relevant national, regional, and local planning policy, the zoning objectives attached to the site and the contextual location of the site, the development now put forward for permission is considered to represent a sustainable development and efficient use of zoned lands for new residential development, and therefore we request that the permission being sought is granted.

Yours sincerely,

Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Managing Director
Armstrong Fenton Associates.