



ARMSTRONG FENTON

ASSOCIATES

PROJECT:

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

APPLICANT:

Capami Ltd.

REPORT:

Planning Statement

DATE:

September 2024.

**Planning &
Development
Consultants**



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1.0. Introduction

- 1.1.** This Planning Statement has been prepared by Armstrong Fenton Associates, Planning & Development Consultants of 13 The Seapoint Building, 44/45 Clontarf Road, Clontarf, Dublin 3, D03 A0H3, on behalf of Capami Ltd. (the applicant), to accompany this application for permission for a Large-scale Residential Development (hereafter "LRD") planning application, submitted to the Planning Authority, South Dublin County Council, in respect of a site measuring c. 20 hectares, located in the townlands of Bohernabreena, Oldcourt, and Killinenny, Dublin 24.
- 1.2.** In summary, the applicant is seeking a seven year planning permission to develop the subject site as a Large-scale Residential Development (hereafter "LRD") consisting of 523 no. residential units, comprised of 255 no. 2, 3 & 4 bed detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 3 & 3-4 storey blocks, along with a 2-storey childcare facility of c. 457sq.m.
- 1.3.** The proposed development falls under the definition of Large-scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act, 2021, as it consists of *"the development 100 or more houses" the floor space of which "is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development"*.
- 1.4.** A seven year permission for the proposed development is sought as it is considered this is appropriate given the scale and nature of the proposed development, the delivery of all of the site development and infrastructural works and context and complexities of the subject site. However, as set out further in this report (section 9 – Phasing), the applicant intends to commence and complete construction in a timely manner, which is demonstrable in the pattern of construction the applicant has and is currently carrying out on adjoining lands. We refer to legislation in 2021, Section 42(8) of the Planning and Development Act, 2000 (as amended) which provides that a planning authority shall not extend planning permissions granted that are subject to an EIAR / NIS, unless the balance of works to be completed can be screened out and accordingly, it is put forward that it is currently appropriate to request a duration beyond the typical five year permission for this application.
- 1.5.** The purpose of this Planning Statement is to provide background information on the site, a description of the proposed development to support this application for permission. This Planning Statement along with the accompanying Statement of Consistency should be read in conjunction with the drawings, technical reports and documents listed within the enclosed Cover Letter by Armstrong Fenton Associates.

The application is also supported by a comprehensive range of additional planning documentation including for, *inter alia*:

- Statement of Response to South Dublin County Council's LRD Opinion ((Ref. LRDOP001/24),
- Statement of Consistency with relevant national, regional and local planning policy
- Social & Community Infrastructure Assessment
- Housing Quality Assessment
- Building Life Cycle Report
- Environmental Impact Assessment Report (EIAR)

All of these documents have been prepared by Armstrong Fenton Associates and accompany the application as separate standalone documents.

It should be noted that a dedicated website has been set up for this planning application which can be viewed at www.oldercourtlrdd.ie.

1.6. The proposed LRD can be described as follows, as per the public notices:

Capami Ltd. wishes to apply for a seven year planning permission for a Large-Scale Residential Development (LRD) on a site measuring c.20.4Ha, located in the townlands of Bohernabreena, Oldcourt, and Killinenny, Dublin 24. The development site is located to the east of Bohernabreena Road, north and east of Bohernabreena cemetery, south and south-east of St. Anne's GAA club, south and south-west of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction) and west of Oldcourt Road (R113).

The proposed development consists of 523 no. residential units comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 2-3 & 3-4 storey blocks (i.e. Blocks A, B2 & D, and 2 no. Blocks B1 & 2 no. Blocks C), along with a 2 storey childcare facility of c. 457sq.m.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 7.3Ha of public open space, and c. 5,505sq.m of communal open space associated with proposed residential units.

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site, via 2 no. accesses, located off Bohernabreena Road, (ii) from the north of the site, via 1 no. access at Dodderbrook Place, and (iii) from the east of the site, via Oldcourt Road (R113) and via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06sq.m).

The proposed development provides for (i) all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations, (ii) public open spaces (c. 7.3Ha), (iii) communal open spaces (c. 5,505sq.m), (iv) hard and soft landscaping and boundary treatments, (v) surface car parking (746 no. car parking spaces, including EV parking), (vi) bicycle parking (1,268 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) public lighting, and (ix), plant / PV panels (M&E), utility services & 5 no. ESB sub-station/kiosks, all on an overall application site area of c.20.4Ha.

2.0. Site Location and Description

Locational Context

- 2.1.** The subject site measures c.20.4 hectares and is in the townlands of Bohernabreena, Oldcourt and Killinenny, Dublin 24, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014, (as extended).
- 2.2.** The applicant is the owner of the majority of the application site, however, lands in the south-west part of the subject site, adjacent to Bohernabreena Road, occupied by 2 no. dwellings and outbuildings are in the ownership of Mr. Pat Grimes who has issued a letter of consent for the inclusion of his lands as part of this LRD Planning Application. In addition, the red line of application extends across lands in the control of both Dublin City Council and South Dublin County Council, through which it is proposed to provide a 225mm Ø Foul Sewer pipe to extend from the proposed LRD on the applicant's lands, eastwards via land in the control/ownership of both Dublin City Council and South Dublin County Council to connect into existing drainage infrastructure – both of the aforementioned Local Authorities have issued letters of consent to include their lands in this LRD application and we refer the reader to same, and the associated maps.
- 2.3.** The subject site is located to the east of Bohernabreena Road (L7114) and north and east of Bohernabreena cemetery, south/south-east of St. Anne's GAA club, south of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction under Planning Ref.s SD17A/0468 & SD22A/0356) and west of Oldcourt Road (the R113).
- 2.4.** The aforementioned Dodderbrook and Ballycullen Gate developments have been / are being successfully delivered respectively by the applicant. In addition, the applicant has permission for the development of 21 no. residential units located to the west of Dodderbrook (granted permission under South Dublin County Council Ref. SD19A/0104 / An Bord Pleanála Ref. ABP-305800-19) which has recently commenced construction. Permission has also been granted for the development of 71 no. units to the immediate west of the subject site under Ref. SD23A/0083. Further east of the subject site is the Ballycullen Green residential estate and the Gunny Hill playing pitches, which have also been delivered by the applicant in recent years. Figure 1 on the page over provides for an illustrative map of the subject site and the surrounding developments/permissions in the vicinity.

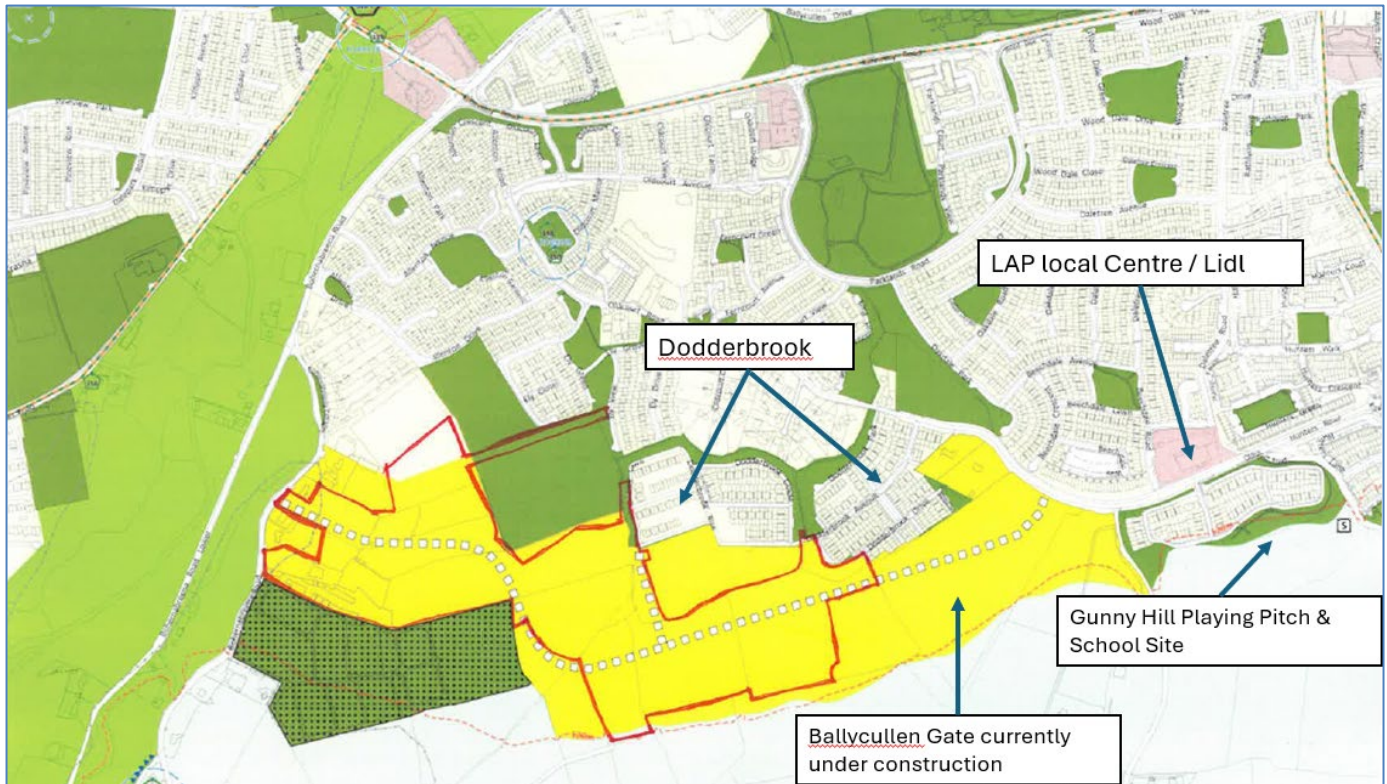


Fig. 1: Extract from South Dublin County Development Plan, 2022-2028 (Map No. 9), with subject site indicatively outlined in red.

2.5. The application site also lies within the boundary of the Ballycullen-Oldcourt Local Area Plan (2014, as extended) lands (hereafter “Plan lands”) which stretch across the foothills of the Dublin mountains, forming a buffer between the mountains and the existing suburban areas of Tallaght, Firhouse and Knocklyon.

The Plan lands are bounded to the west by Bohernabreena Road, to the east by the M50, to the north by existing suburban development, including for the Allerton, Ely, Beechdale, Hunters Wood, Woodstown, and Dalriada estates, and to the south by the foothills of the Dublin mountains. With their mountainous backdrop, the Plan lands are generally semi-rural in setting; however, they also benefit from views of the suburban and urban hinterland. The prevailing development in the immediate vicinity is generally comprised of two and three storey housing.

Figure 2 overleaf provides for an extract of Figure 1.4. of the Ballycullen-Oldcourt Local Area Plan, with the approximate location of the subject site identified by a yellow star and the Plan lands outlined in red.

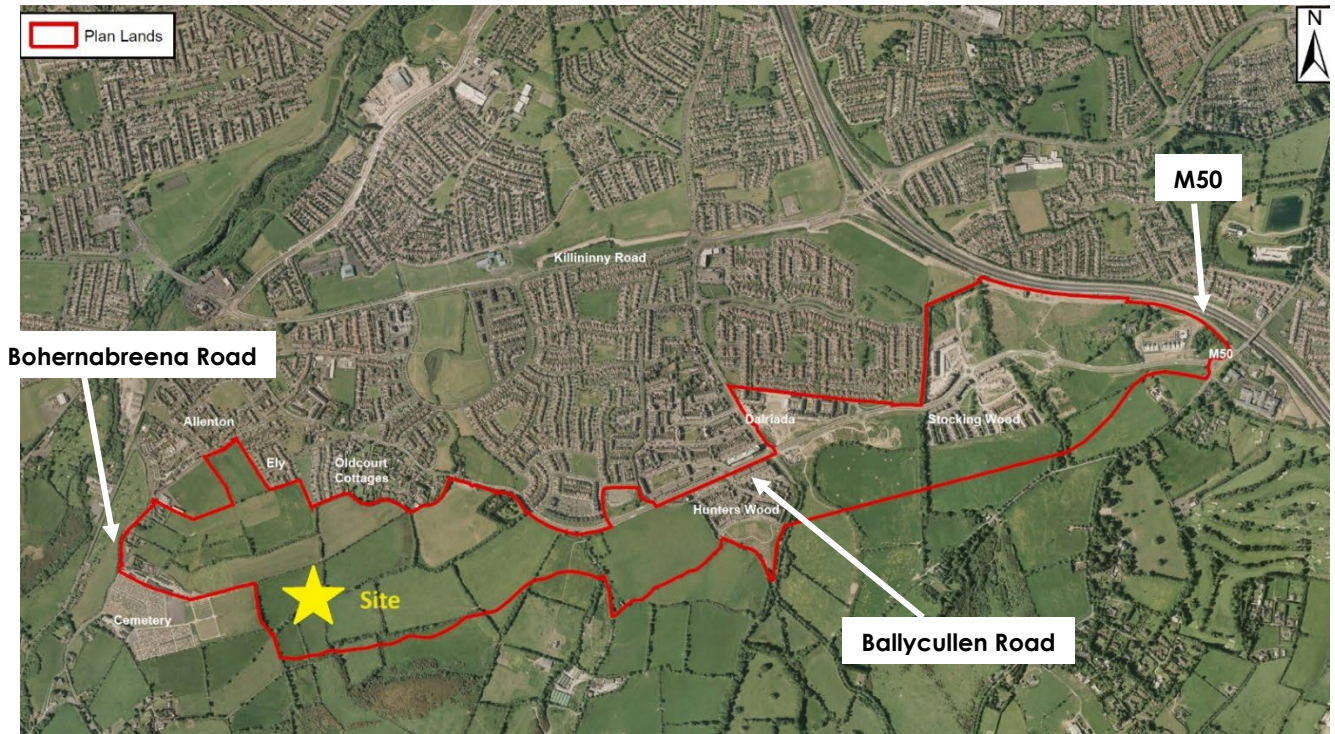


Fig. 2. Location of the Subject Site within the Plan Lands.

2.6. Over the last decade, several new residential developments have been constructed within the Plan lands, with the lands primarily being zoned for new residential development. It is relevant to note that for the purposes of the Ballycullen-Oldcourt Local Area Plan's phasing strategy, the Plan lands are divided into "eastern" and "western" sides, with Ballycullen Road being the point of division.

To the east of the subject site, on the eastern side of the Plan lands, residential development has taken place to the south of Stocking Avenue (i.e., Abbots Grove and Stocking Wood) and to the north of Stocking Avenue (i.e., Dalriada). Also east of the subject site, on the western side of the Plan lands, residential development has taken place to the south of Hunter's Road (i.e., Ballycullen Green and Hunters Wood) and to the north of Hunter's Road (i.e., Hunters Wood) – refer to Figure 3 of this Planning Statement for further detail.

The applicant previously delivered the Ballycullen Green development (under SDCC Ref.'s SD15A/0150 & SD18A/0025), as well as the Gunny Hill playing pitches (under SDCC Ref. SD16A/0059 / An Bord Pleanála Ref. PL06S.247693) which are located to the south of Ballycullen Green – refer to Figure 4 of this Planning Statement for further detail. Further on in section 5, we set out all of the relevant planning history attached to the subject site.

Site Context

- 2.7.** As illustrated in Figure 2, above, the subject site itself is located on the western side of the Plan lands. More specifically, the site is located to the east of Bohernabreena Road, north and east of Bohernabreena cemetery, south and south-east of St. Anne's GAA club, south and south-west of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction) and west of Oldcourt Road (the R113) – refer to Figure 5 of this Planning Statement for further detail.

The Dodderbrook and Ballycullen Gate developments have been / are being successfully delivered by the applicant and, in addition, the applicant also has permission for development of 21 no. residential units located to the west of Dodderbrook, fronting onto Oldcourt Road (the R113), which was granted permission under SDCC Ref. SD19A/0104 / An Bord Pleanála Ref. ABP-305800-19), which has recently commenced construction, and will ultimately form part of the Dodderbrook estate.

Permission has also been granted for the development of 71 no. units to the immediate west of the subject site under Ref. SD23A/0083. Further east of the subject site is the Ballycullen Green residential estate and the Gunny Hill playing pitches, which have also been delivered by the applicant in recent years.

Figure 3 of this Planning Statement provides for a map of the subject site and the surrounding developments / permissions in the immediate vicinity. **Note:** Please refer to submitted architectural drawings for accurate site boundary i.e. Figure 3 is submitted for illustrative purposes only.

- 2.8.** The subject site is considered generally well-served by existing and planned public transport infrastructure. The nearest existing bus stops are located approximately 1 km north of the eastern end of the site, at Killinenny, Road, with the proposed development catering for the provision of 2 no. potential bus stops on the main link street running through the development, ensuring future residents will have access to good public transport and existing services in the area. Based upon feedback received from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future, which will further aid a transition to more sustainable transport modes. In addition, Junction 12 of the M50 is located within a 5 minute driving distance (approximately 2.5 km to the north-east), allowing for ease of access to Dublin city centre, while a number of services, including for Luas services, are available at Tallaght town centre (approximately 5 km to the north-west).

Other notable landmarks in the vicinity of the subject site include: Bohernabreena cemetery (abutting the south-western part of site), St. Anne's GAA club (abutting the north-western part of site), Oldcourt Hill Farm Allotments (approximately 150m to the east of the site), Thomas Davis GAA pitches (approximately 450m north-west of the site), Holy Rosary primary school and church (approximately 600m north of the site), the Park Community Centre (approximately 700m north of the site), a Lidl supermarket (approximately 525m north-east of the site) and Firhouse Educate Together Secondary School (approximately 600m east of the site) – refer to Figure 3 overleaf, for further detail.



Thomas
Davis GAA
(off picture)

St. Anne's
GAA

Existing Bus
Stops at
Killinenny
Road

Holy Rosary
Primary School
and Church

The Park
Community
Centre

Lidl
Supermarket

Hunters Wood

ARMSTRONG FENTON ASSOCIATES

Dalriada

M50 Access

Stocking Wood



Bohernabreena
Cemetery

Subject LRD Site (Indicative
Site Boundary Outlined in Red)

Oldcourt Farm
Allotments

Firhouse
Educate
Together
School
Campus

Hunters Wood

Abbots Grove

Fig. 3. Wider Site Context.

Site Description

2.9. In its existing state, the subject site is characterised by a sloped terrain, rising to the south, existing native hedgerows, and existing services infrastructure. The site is predominantly greenfield agricultural lands, dissected with mature hedgerow boundaries, with existing dwellings and buildings located in the south-western part of the site, all of which are proposed to be demolished. The site is at the urban edge of the County, with residential development to the north and open field agricultural lands to the south.

There is an existing ESB pylon corridor, with an associated wayleave, running across the site from west to east, and an existing Irish Water main, with an associated wayleave, also running across the site from west to east. The proposed development has been designed to allow for the accommodation of these existing infrastructure and their wayleaves, including for all necessary set-backs / development restrictions, within the proposed layout.

The site has the presence of hedgerows, characterized by shrubs, bushes, and trees, which create natural boundaries. In addition, the site has the presence of some small streams. The proposed development has been carefully considered to accommodate the retention of existing hedgerows as much as feasibly possible, with new planting proposed to supplement any loss, with existing streams also accommodated into the proposed landscaping features – as per the submitted landscaping proposals prepared by Gannon + Associates, and arboricultural details prepared by Arborist Associates – please refer to same.

The site also has some existing buildings / structures located in the western part of the site (north of Bohernabreena cemetery) which are proposed to be demolished as part of the development. These existing buildings / structures are not protected structures nor are they of any particular historical or architectural interest. Plans of the buildings to be demolished are submitted as part of this application, including 2 no. habitable dwellings. The total floor area of the structures to be demolished is 4,152.06m².

The subject site generally falls from south to north, with a high point of the southern boundary of Approximately 119.78m OD Malin. The lowest point along the northern boundary is approximately 98.12m OD Malin where the site connects into an existing ditch. The ground level rises steeply from north to south - there is a difference of approximately 21.0m in elevation between the north and south. The ground level continues this steep gradient south of the Site. The ground level falls away north of the Site but at a shallower gradient.

For convenience, Figure 4 overleaf, provides an aerial view of the site looking from the west. We also refer the Planning Authority to the submitted architectural and landscaping design statement for additional images for the site, as well as photomontages prepared as part of the submitted Landscape Visual Impact Assessment (LVIA) – please refer to same.



Fig. 4. Aerial View of the Subject Site looking from the West (Bohernabreena Cemetery in the Right Foreground).

3.0. Pre-planning Consultation

3.1 LRD “Stage 1” Section 247 Pre-Application Consultation

The context and design approach to the application site and for the proposed development, have been subject to pre-planning consultation with the South Dublin County Council (hereafter ‘SDCC’) Planning Department under Section 247 of the Planning and Development Act, 2000 (as amended). The S.247 pre-planning meeting was held with SDCC via Microsoft Teams on 30th June 2023. The pre-planning Ref. No. for the meeting was LRDPP010/23.

The main representatives of the Planning Authority at the meeting were Gormla O’Corrain, Senior Planner, and Jim Johnston, Senior Executive Planner. Also, in attendance at the meeting on behalf of SDCC were representatives from the various departments of SDCC, including Parks, Roads / Transportation and Water Services.

In attendance on the side of the design team, were Michael Whelan of Capami Ltd. (the applicant), Alan Fenton of Armstrong Fenton Associates, Scott Morton of Davey + Smith Architects, Shaun O’Reilly and Ronan Kearns of Pinnacle Consulting Engineers and Jonathan Gannon of Gannon + Associates Landscape Architecture.

The overarching principles of the proposed LRD were discussed at this meeting with the main issues raised including for, *inter alia*: the constraints and topography of the site, the status of the Ballycullen-Oldcourt LAP in the context of more up-to-date planning policy, the proposed density, the need to protect the visual amenity of adjoining development and the semi-rural setting of the site, proposed road infrastructure, the standard and quality of residential development proposed, proposed building heights, the proposed public open space provision, and the permeability and connectivity of the proposed layout.

It should be noted that following the above meeting, the applicant's design team members have further liaised with the Planning Department and other departments of SDCC, as appropriate, to address areas of concern which were raised at the meeting prior to the submission of the subject request for an LRD "Stage 2" pre-application consultation.

For convenience, a copy of the minutes of the LRD pre-application consultations is included in Appendices A & B of this Statement – please refer to same for full details.

3.2 "Stage 2" LRD Pre-Planning Meeting

The formal "LRD" meeting with the Planning Authority was held on 1st March 2024 online, via Microsoft Teams, under Section 32C of the Planning and Development (Large Scale Residential Developments) Act 2021, under Ref. LRDP001/24.

The main representatives of the Planning Authority at the meeting were Gormla O'Corrain, Senior Planner, Jim Johnston, Senior Executive Planner, and Aoife O'Connor-Massingham. Also, in attendance at the meeting on behalf of SDCC were representatives from the various departments of SDCC, including Parks, Housing, Roads / Transportation and Water Services.

In attendance on the side of the design team, were Michael Whelan of Capami Ltd. (the applicant), Tracy Armstrong of Armstrong Fenton Associates, Greg Davey and Andrea Maldonado of Davey + Smith Architects, Shaun O'Reilly, Jason Burger and Ronan Kearns of Pinnacle Consulting Engineers and Jonathan Gannon of Gannon + Associates Landscape Architecture.

The main topics for discussion at the "LRD" meeting included:

1. Development proposal,
2. Wayleaves on the site and possible future options for the relocation of existing overhead ESB wires,
3. Adjoining playing pitches, if there is to be a loss to same?
4. Permeability within site and connecting to a through adjoining sites,
5. Proposed phasing,
6. Need for a community centre?
7. EIAR required,
8. Calculate density in accordance with new 2024 Sustainable Residential Development and Compact Settlement Guidelines,
9. Need to submit CGIs of the proposed development with final application details,
10. Landscaping matters such as provision of street trees, integration of SuDS with landscaping proposals, retention of hedgerows,
11. Roads/ Traffic matters such as details of cycle path design, visibility splays, parking rates, bus stop locations to be determined in conversation with the NTA, links to Dodderbrook to the north,
12. Drainage matters such as how to deal with surface water from adjacent sites upstream from proposed site, attenuation etc.
13. Housing – Part V provision.

3.3. South Dublin County Council LRD Opinion, Ref. LRDOP001/24

Under Section 32(D) of the aforementioned Act, the Planning Authority's LRD Opinion was received on 28th March 2024 under Case Reference LRDOP001/24. The LRD Opinion states: *"Taking into account the discussion held at the s32C 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.*

In the event that the applicant proceeds to submit a planning application, the LRD application should include:

- *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".*

The LRD Opinion sets out the following issues to be addressed as part of a LRD planning application. Enclosed with this application is a separate document prepared by Armstrong Fenton Associates entitled '*Statement of Response to South Dublin County Council's LRD Opinion*'. This document fully addresses all of the matters raised in the LRD Opinion – for full details please refer to same. However, for convenience Tables 1 and 2 overleaf provide a summary of same:

Item No.	Item Requested	Method of Response
1	<i>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.</i>	Please refer to section 7.3 of this Planning Statement and section 5.3 of the enclosed Statement of Consistency which sets out details of the density of the proposed development, which has been calculated in accordance with guidance set out in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024. To confirm, the net density of the proposed development is 42 units per hectare.
2	<i>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.</i>	The submitted site plan does not include any perpendicular car parking spaces along the main link street, with limited parallel spaces proposed. The majority of car parking spaces are provided for on the secondary and tertiary streets within the development, and where appropriate, on-curtilage.
3	<i>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.</i>	<p>This application is accompanied by a DMRUS Statement of Compliance, prepared by Pinnacle Consulting Engineers demonstrating that the proposed development accords with DMURS – please refer to same.</p> <p>A continuous two-way cycle track is proposed along the northern side of the main link street, with appropriate pedestrian crossing and footpaths also catered for.</p> <p>The proposed east-west link street can accommodate 2 no. future bus stops to serve the western part of the LAP lands, which may, in the future, increase the availability of public transport services.</p> <p>Two bus stops will be provided along the proposed road link scheme. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future.</p>

<p>4</p>	<p><i>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.</i></p>	<p>Hedgerows will be retained to the greatest extent possible (c.85%), with removal considered only when necessary for the implementation of larger connecting structures, such as the east-west main link street which is an objective of the Development Plan and LAP. Circa 28,871m of hedgerows are to be maintained on site.</p> <p>The integration and preservation of hedgerows are integral to the design and layout of the proposed open spaces, with existing hedgerows in same preserved, particularly in Oldcourt Park and we refer the reader to the submitted landscape plans prepared by Gannon & Associates, Landscape Architects and the tree and hedgerow survey prepared by Arborist & Associates, the findings of which have been incorporated into the proposed landscape design.</p> <p>There are no hedgerows provided in any private open space areas and do not form the site boundary of any single dwelling. All retained hedgerows are in the public realm.</p>
<p>5</p>	<p><i>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.</i></p>	<p>The proposed development provides for pedestrian and cyclist connections throughout:</p> <ul style="list-style-type: none"> ▪ along the main link street, connecting Oldcourt Road to Bohernabreena Road, and to permitted development to the east at Ballycullen Gate ▪ northwards via Oldcourt Park into Dodderbrook at the north-east and north-west corners of this proposed park. ▪ In Neighbourhood Zone 3, the site layout plan facilitates a pedestrian / cyclist connection directly into St. Anne's GAA club, to be agreed with the club post-planning. <p>Lands zoned OS, abutting the subject site, are not in the control of the applicant, however, the proposed site layout plan does not preclude the delivery of future links/connections to Ely View and we note that there is an existing low level fence between Ely</p>

		<p>View and Dodderbrook Lawn that could potentially facilitate a pedestrian access point thus connecting into the proposed development. The applicant is willing to agree such details with the Local Authority should it be required in the future.</p> <p>Please refer to section 6.3.1 (page 69) of the enclosed Landscape Design Rationale prepared by Gannon & Associates Landscape Architects for details of the permeability plan.</p>
6	<p><i>Flow route analysis and conveyance plan required to inform SuDS strategy at the site which maximises above ground, natural, attenuation</i></p>	<p>A pre-development flow route analysis was completed and issued to Brian Harkin of South Dublin County Council Water Services on the 25th of July 2024, prior to the lodgement of this LRD planning application. Detailed pre and post development flow route analyses can be found in the submitted Pinnacle Consulting Engineers drawing no.s:</p> <ul style="list-style-type: none"> ▪ P211102-PIN-XX-XX-DR-C-00220-S2 "Pre-Development Flow Route Analysis" ▪ P211102-PIN-XX-XX-DR-C-00221-S2 "Post-Development Flow Route Analysis" ▪ <p>All surface water drainage on site will be subject to above ground, natural, attenuation, in line with SUDS, with no underground attenuation proposed.</p>
7	<p><i>Engage directly with Water Services to agree proposals relating to the diversion of the 450mm surface water sewer</i></p>	<p>The applicant and the project engineers, Pinnacle Consulting Engineers met with South Dublin County Councils Water services and Public Realm Divisions, on the 13th of May 2024.</p> <p>During the 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</p>

		<p>network's discharge in the pipeline was not attenuated.</p> <p>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 degree, limiting the junction losses on the pipeline.</p> <p>The proposed diverted surface water pipeline is setback a minimum of 5m from all proposed structures.</p> <p>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.</p>
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Table 1 – Summary of matters addressed, as required by LRD Opinion Ref. LRDOP001/24

In addition to responding to various items as requested by the Planning Authority, the LRD Opinion identifies the following particulars that are to be submitted with any application for permission, which are as follows:

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	<p>Schedule of Accommodation:</p> <p>a) To include adequate information in relation to the calculation of Development Contributions</p>	<p>Please refer to the submitted HQA and the separate "Planning Stats".</p> <p>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.</p>
3	<p>Architect's Design Statement</p> <p>a. To include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan)</p> <p>b. The Design Statement shall include, inter alia, a detailed</p>	<p>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</p>

	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	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 with and without leaves), with views from sensitive nearby receptors	We enclose CGIs of the proposed development, along with photomontages prepared in conjunction with the Landscape Visual Impact 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	<p>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.</p> <p>There are 4 no. "Landscape Detail Area" drawings also enclosed, on which street trees can be identified – please refer to these drawings.</p> <p>Please also refer to section 7.1 of the submitted Landscape Design Rationale for the details of the overall planting plan.</p>
10	<p>Landscape Scheme, to include:</p> <p>a. Planting Plan:</p> <ul style="list-style-type: none"> i. Location of species, types of plants, planting sizes and proposed numbers/densities, ii. Implementation timetables, iii. Proposals for future maintenance/management. 	<p>Gannon & Associates Landscape Architects have prepared the enclosed planting plan – refer to drawing no. 23130_LP_E_SLP "Soft Landscape Plan".</p> <p>Please also refer to section 7.1 of the enclosed Landscape Design Rationale for a full planting schedule.</p> <p>Please refer to section 8.1 of the enclosed Landscape Design Rationale for details of planting, management and maintenance of the open spaces.</p>
11	Tree and Hedgerow Protection Plan	<p>Arborist & Associates have prepared the submitted Arboricultural Assessment and Tree Protection Plan, set out across 4 no. drawings – please refer to same.</p>
12	Play – detailed design of play areas, including items of equipment to be included	<p>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.</p>
13	Ecological Impact Assessment	<p>Please refer to Chapter 5 "Biodiversity", prepared by Enviroguide Consulting, of the enclosed EIAR which provides the Ecological Impact Assessment of the proposed development.</p>
14	Road Safety Audit	<p>A Stage 1 & 2 Road Safety Audit, prepared by Bruton Consulting Engineers is enclosed.</p>
15	Details for covered outdoor bicycle parking	<p>Please refer to the submitted Davey + Smith drawing no. MP22 "Overall Lands - Proposed Bikes Location" for details of the various types of</p>

		proposed covered bicycle parking and locations of same throughout the site.
16	<p>Layout Plans, not less than 1:200 scale to show:</p> <p>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.</p> <p>b. All of the developments access junctions, showing the carriageway dimensions and junction type and provision of a visibility splay.</p> <p>c. Location and design of all pedestrian crossings within the development.</p> <p>d. Swept Path Analysis demonstrating that fire tenders and large refuse vehicles can access/egress the site.</p> <p>e. Autotrack/swept path analysis for the bus routes along the link street, ensuring adequate widths at bends/junction.</p>	<p>Please refer to the following details submitted as part of the LRD planning application:</p> <p>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:</p> <ul style="list-style-type: none"> ▪ P211102-PIN-XX-DR-D-101-S1 <u>to</u> ▪ P211102-PIN-XX-DR-D-104-S1, which are the General Layout Sheets 1, 2, 3 & 4 ▪ P211102-PIN-XX-DR-D-110-S1 <u>to</u> P211102-PIN-XX-DR-D-113-S1, which are the Sightlines Sheets 1, 2, 3 & 4 <p>c. The location and design of all pedestrian crossings within the development are illustrated in Pinnacle Consulting Engineers Drawing No.s:</p> <ul style="list-style-type: none"> ▪ P211102-PIN-XX-DR-D-101-S1 <u>to</u> ▪ 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 <p>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:</p> <ul style="list-style-type: none"> ▪ P211102-PIN-XX-DR-D-120-S1 <u>to</u> 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 <u>to</u> P211102-PIN-XX-DR-D-133-S1 which are the Autotrack Layouts for Refuse Vehicle drawings i.e. sheets 1 - 4. <p>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:</p> <ul style="list-style-type: none"> ▪ P211102-PIN-XX-DR-D-134-S1 <u>to</u> P211102-PIN-XX-DR-D-137-S1 which are the

<p>f. Location of the refuse collection points.</p> <p>g. Taking in Charge Plan, including areas to be maintained by a management company.</p> <p>h. Detailing the autotrack and visibility splay of vehicles entering and exiting the development.</p> <p>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.</p> <p>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.</p>	<p>Autotrack Layouts for Bus drawings i.e. sheets 1 - 4.</p> <p>f. Refer to the enclosed Davey + Smith Drawing no. MP24 "Overall Lands – Proposed Bin Collection Points".</p> <p>g. Refer to the enclosed Davey + Smith Drawing no. MP08 "Overall Lands – Proposed Taking in Charge Map".</p> <p>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:</p> <ul style="list-style-type: none"> ▪ 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 <p>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:</p> <ul style="list-style-type: none"> ▪ 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 <p>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.</p>
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	<p>k. Location of 20% EV charging car parking spaces</p> <p>l. A total of 5% Mobility Impaired Car Parking Spaces</p>	<p>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.</p>
17	<p>SUDs Strategy, to include:</p> <p>a. SUDs Design details</p> <p>b. Flow route analysis for site.</p> <p>c. Comprehensive surface water conveyance plan for the site</p>	<p>a. Please refer to Section 7.3 “SuDS Strategy” of the submitted Engineering Assessment Report prepared by Pinnacle Consulting Engineers for details.</p> <p>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.</p> <p>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.</p>

<p>d. Drawing showing how much surface water is attenuated in m³.</p> <p>e. Revised report showing surface water attenuation calculations for proposed development.</p> <p>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 SuDS (Sustainable Drainage Systems).</p> <p>g. If underground tanks present, why these cannot be excluded from the design.</p>	<p>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.</p> <p>e. Refer to the enclosed Engineering Assessment Report Part 2 - Appendices for the surface water attenuation calculations.</p> <p>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.</p> <p>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.</p> <p>Refer to the enclosed Engineering Assessment Report Part 2 - Appendices for the surface water attenuation calculations.</p> <p>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</p>
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	<p>h. SUDs Layout identifying the different types of SUDs features.</p> <p>i. Demonstrate adherence to SDCC SUDs guidance.</p> <p>j. Drawing showing plan and cross-sectional views of all SuDS features</p>	<p>the use of a conventional gully and piped surface water network, as guided by the SDCC Sustainable Drainage Explanatory Design & Evaluation Guide 2022.</p> <p>h. Refer to the following enclosed drawings prepared by Pinnacle Consulting Engineers for the Suds Drainage Layout:</p> <ul style="list-style-type: none"> ▪ 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 <p>which are the various SuDS Drainage Layouts Sheets 1-6.</p> <p>i. Refer to the enclosed Engineering Assessment Report and associated SuDS drawings for details.</p> <p>j. Refer to the following enclosed drawings prepared by Pinnacle Consulting Engineers for the Suds cross sections drawings:</p> <ul style="list-style-type: none"> ▪ 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 <p>In addition, please also refer to the following submitted drawings:</p> <ul style="list-style-type: none"> ▪ 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 12 th 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 Assessment and Impact 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.

Table 2 – Summary of particulars submitted as part of this LRD planning application, as required by LRD Opinion Ref. LRDOP001/24

4.0 Planning Context

4.1 South Dublin County Development Plan 2022-2028

4.1.1 Land-Use Zoning

The majority of the subject site is currently zoned objective "Res-N": *"To provide for new residential communities in accordance with approved area plans"* in the existing South Dublin County Development Plan 2022-2028 (hereafter "CDP"). The current proposal for the development of 523 no. residential dwellings and a childcare facility on the subject site is therefore considered appropriate and in compliance with the land-use zoning objective attached to the site.

A triangular portion of the site at the northwest (adjacent to St. Anne's GAA club) is zoned objective "RES": *"To protect and / or improve residential amenity"*. Under this land use zoning objective, residential development is permitted in principle, with childcare facility being a use that is open for consideration.

At the north of the site, a strip of land, currently zoned objective "OS": *"To preserve and provide for open space and recreational amenities"* is included for infrastructural purposes i.e. to accommodate a proposed 225mm Ø Foul Sewer pipe. It is put forward that given the proposed sewer pipe will be located underground, the provision of a use compatible with the open space zoning above same will be possible and therefore no material contravention issues arise in relation to same. We also note that Public Services, defined in Appendix 6 of the Development Plan as including *"all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers..."* are open for consideration under this zoning objective. The proposed infrastructure is ancillary to residential development, which is only open for consideration in accordance with H3 Objective 4, community led housing for older persons and social / affordable housing, therefore it is considered that the proposed sewer on "OS" land will not affect the future utility of the "OS" lands and no, permanent, above ground impacts will occur directly as a result of this development.

Letters of consent from South Dublin County Council and Dublin City Council to the inclusion of the land required to accommodate the proposed sewer are enclosed with this LRD application.

To the south, a small portion of land (within Neighbourhood Zone 1 & immediately south of proposed house no.s 154 - 156) is zoned "RU": *"To protect and improve rural amenity and to provide for the development of agriculture"*. This parcel of land is proposed as open space, with no other development proposed on same. Under the "RU" land use zoning objective, open space is a use that is permitted in principle under this zoning objective.

Please refer to the submitted Davey+Smith drawing no. MP13 "Overall Lands – Land Use Zoning Map" which overlays the proposed development and red line of application over the CDP Zoning Map no. 9 – an extract of same is shown overleaf in Fig. 6.

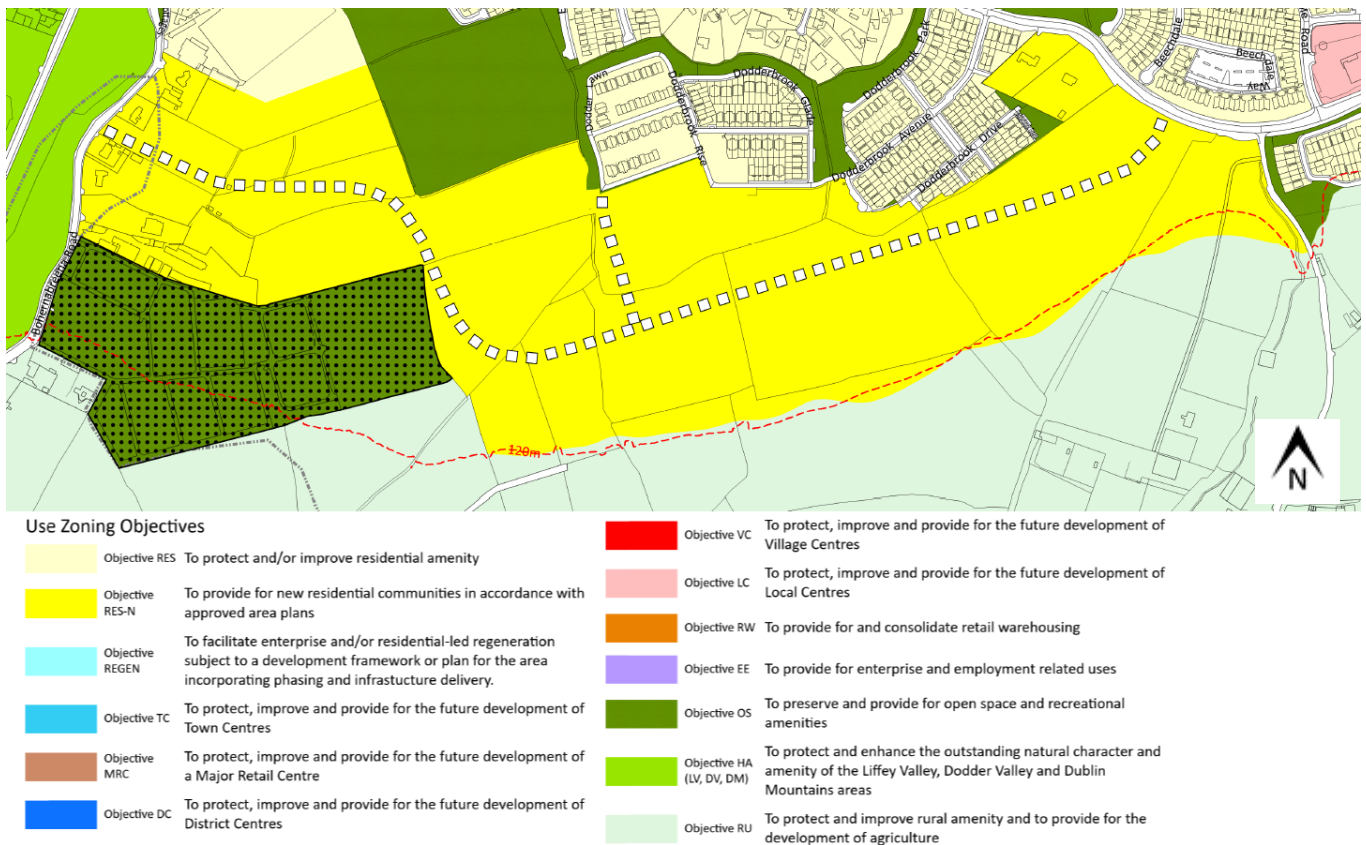


Fig. 5. Extract of Map 9 of the South Dublin County Development Plan, 202-2028 illustrating the Land-Use Zoning Objectives attached to the Site.

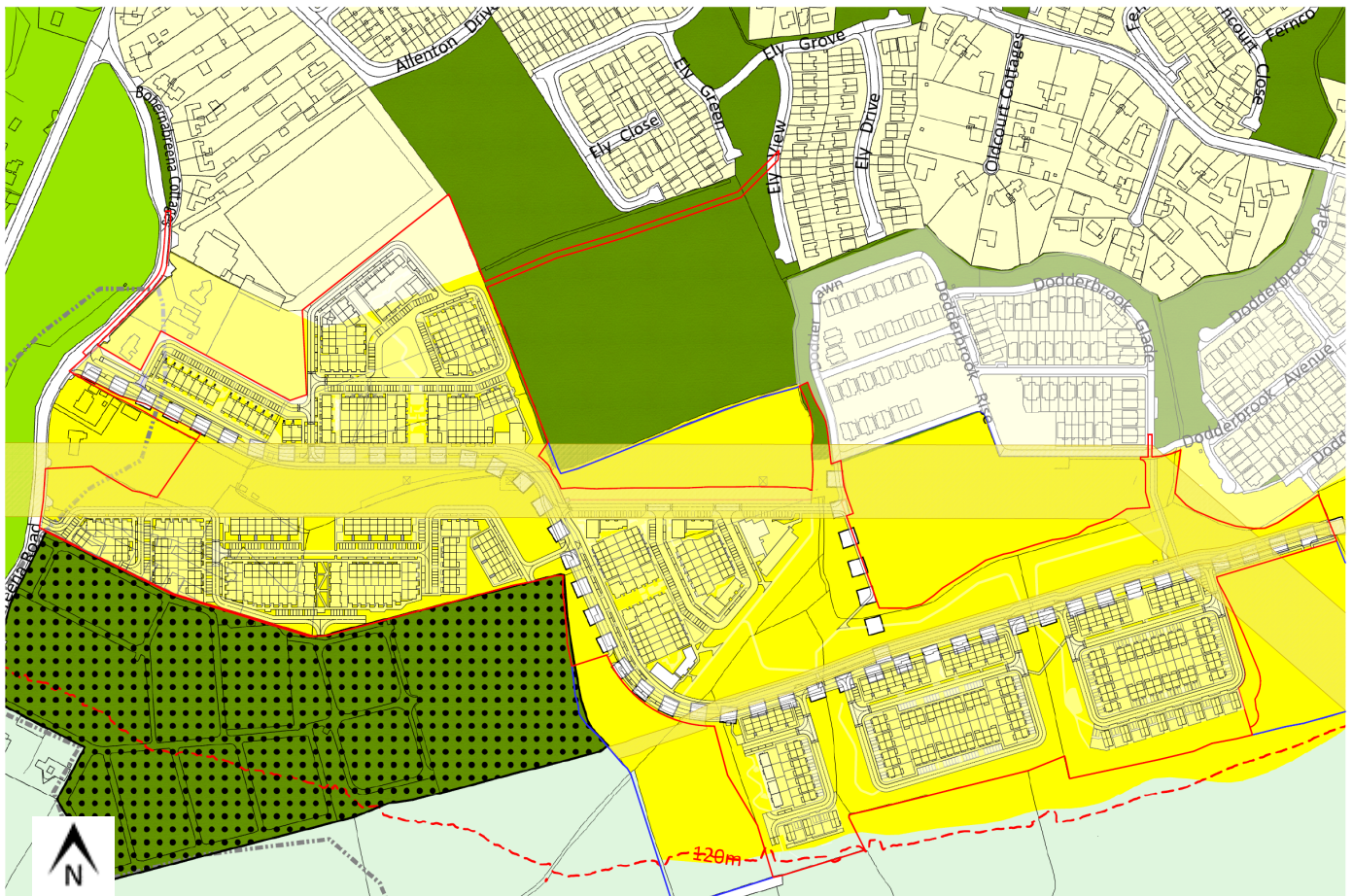


Fig. 6. Proposed development i.e. site layout plan & red line of LRD application overlaid on extract of Map 9 of the existing CDP illustrating the "RES-N", "RES" and "RU" Land-Use Zoning Objectives attached to the application site.

4.1.2 Core Strategy

Chapter 2 of the existing CDP contains the “Core Strategy and Settlement Strategy” for the county during the life of the CDP, the purpose of which is to demonstrate the quantum and location of development in the county aligns with national and regional planning policy. The Core Strategy and Settlement Strategy quantitatively demonstrates how much land is required to meet the residential and employment needs of an additional 45,000 people (approximate) up to the year 2028. The existing CDP states: *“To provide for this level of growth in line with National policy, a need for 23,730 new homes between the Census year 2016 to 2028 within the County has been identified”*.

Section 2.6 of the Core Strategy identifies land capacity (i.e. land that is available for development to meet the requirements of the projected population) and states a “Land Capacity” analysis was carried out by the Planning Department to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the previous 2016-2022 CDP. Figure 9 ‘Housing Capacity Sites’ of the existing CDP (page 51) identifies the subject site as being located on a ‘housing capacity site’. The Ballycullen area is also identified as being part of the ‘Dublin City and Suburbs’ settlement typology in Table 14 of the existing CDP. ‘Dublin City and Suburbs’ is defined as an: *“International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.”*

Figure 9 of the existing CDP identifies the Ballycullen-Oldcourt Local Area Plan lands are a “Housing Capacity Site” – extract of same show overleaf as Fig. 7, with LAP lands circled in red.

Policy CS1: ‘Strategic Development Areas’ of the existing CDP seeks to: *“Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.”*

The subject site is zoned for new residential development in the existing CDP, is identified as being part of the ‘Dublin City and Suburbs’ settlement typology and identified as a ‘housing capacity site’ as per Figure 9 of the existing CDP and, therefore, it is considered the proposed development of 523 no. residential units on the subject site is appropriate and in compliance with the Core Strategy of the existing CDP. Further details of the proposed development’s compliance with the CDP Core Strategy is set out in the accompanying Statement of Consistency (section 7.1) please refer to same.

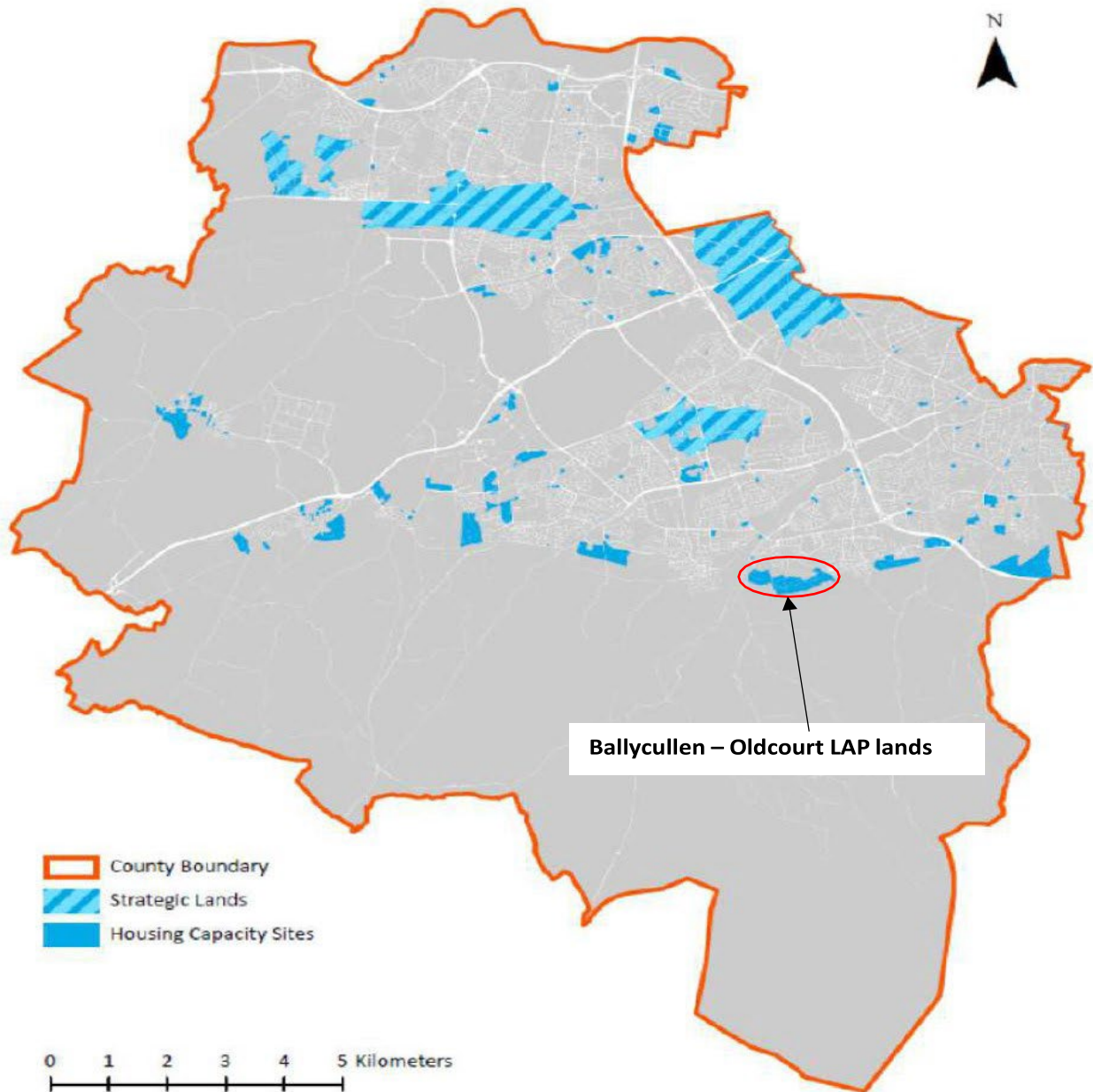


Fig. 7: Extract of Figure 9: Housing Capacity Sites from South Dublin County Development Plan, 2022-2028.

4.1.3 The CDP and the Ballycullen-Oldcourt Local Area Plan 2014

As previously detailed, the subject site is located within the lands designated for the Ballycullen-Oldcourt Local Area Plan, 2014, (hereafter "LAP"). With specific regard to the Ballycullen-Oldcourt LAP, it is noted **Objective QDP3 Objective 7** of Chapter 5 of the existing CDP states: "Any development on the RES-N lands (Killinarden and Ballycullen / Oldcourt) abutting the Rural Zone at Map 9 shall be designed, located, scaled and serviced in a manner that does not detract from the character and landscape of the receiving environment bearing in mind its proximity to the HA-DM zone"; while **Objective QDP14 SLO 3** of the same chapter states: "That the provisions of the Ballycullen - Oldcourt Local Area Plan (2014) as extended, in respect of the steep topography in the lands zoned RES-N between Stocking Lane, Ballycullen Road and the M50 (Map 10) remain in force during the lifetime of this Plan having regard to ministerial guidelines". In addition to the above, it is also noted **Table 7.5** of

the existing CDP (Chapter 7 'Sustainable Movement') details road objectives for the Ballycullen-Oldcourt LAP lands.

As required above, the proposed development has been carefully designed in a manner which is appropriate to the site's context, adjacent to existing residential development, ESB / Irish Water infrastructure and the Dublin mountains, with the proposed buildings being of an appropriate height and scale, and appropriately sited and stepped within the scheme to ensure the development does not detract from the character and landscape of the receiving environment, taking into account the topography of the subject lands. The proposed development also caters for the east-west main link street for the Ballycullen-Oldcourt LAP lands as per Table 7.5 "Six Year Road Programme" of the existing CDP. Given all the foregoing it is fully considered the proposed development complies with the existing CDP's policies in relation to the Ballycullen-Oldcourt LAP.

4.1.4 The CDP and Local Area Plans

The following policies and objectives of the existing CDP, in relation to Local Area Plans, have also been considered in the preparation of the proposed development:

- **Objective CS3 Objective 6** of Chapter 2 which seeks: *"To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority."*
- **Policy QDP13** of Chapter 5 which seeks to: *"Continue to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan or any Local Area Plan, SDZ Planning Scheme, other strategic land designations or framework / masterplan in place in the area".*
- **Objective QDP14 Objective 1** of Chapter 5 which seeks: *"To support a plan led approach through Local Area Plans in identified areas by ensuring that development complies with the specific local requirements of the Local Area Plan, having regard to the policies and objectives contained in this Development Plan and ministerial guidelines".*
- **Objective SM3 Objective 12** of Chapter 7 which seeks to: *"To work with the NTA to secure the expansion of the bus network, including distinct new bus networks as necessary, to serve new development and regeneration areas within the South Dublin County area including Tallaght, City Edge, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle".*

In relation to the above policies and objectives, details of how the proposed development is fully compliant with same are set out in the submitted is set out in the accompanying Statement of Consistency (section 7.1) please refer to same.

We also note that the 2014 Ballycullen-Oldcourt LAP is due to expire and that by the time a decision is due on this LRD planning application, the LAP may have expired. Notwithstanding same, the CDP has zoned the application site for residential land use and also contains various policies / objectives relating to the subject lands, including designating it as a "Housing Capacity Site" in its Core Strategy and setting out roads objectives, all of which the proposed LRD adheres to. It is therefore considered that the permission being sought can be granted in line with the County Development Plan land use zoning objectives attached to the application

site, as well as according with a wide range of national and regional planning policy, as detailed in the accompanying Statement of Consistency.

The proposed development provides for the appropriate level of physical and social infrastructure as identified in the Ballycullen-Oldcourt LAP and given the scale of development, the proposed LRD is to be delivered in a phased manner (as set out in Section 9 of this Planning Statement).

The proposed development is considered to be fully compliant with both the existing CDP and the Ballycullen-Oldcourt LAP. The proposed development allows for 2 no. new bus stops on the main link street traversing the development to be provided for in the future, as agreed with the NTA, thus aiding expansion of the bus network in the area. Given all the foregoing it is considered the proposed development complies with the existing CDP's policies and objectives in relation to the Local Area Plans.

4.1.5 CDP Policies and Objectives

Policies and objectives supporting the existing CDP's strategic vision are contained in the various chapters of the existing CDP. The chapters of the CDP considered most relevant to the proposed development are **Chapter 5** 'Quality Design and Healthy Placemaking' which promotes *"sustainable urban design and healthy placemaking that delivers attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest"*; **Chapter 6** 'Housing' which seeks to ensure the *"delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County"*; and **Chapter 12** 'Implementation and Monitoring' which sets out the *"development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development."*

The proposed development has been considered against the relevant policies and objectives of not just the aforementioned chapters but all of the chapters forming part of the CDP in order to ensure a coherent development which supports the strategic vision of the county. Full details of the proposed development's compliance with same can be found in the accompanying "Statement of Consistency" prepared by Armstrong Fenton Associates which is submitted as a separate, standalone, document and, for the avoidance of repetition, we respectfully refer the reader to this document.

4.1.5.1 The Delivery of Sustainable Neighbourhoods - 'The Plan Approach'

It is noted the existing CDP (Section 5.2.1) promotes the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.

In accordance with **QDP2 Objective 1** of the existing CDP, which seeks: *"To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design"*, this section of the Planning Statement provides details as to how 'the Plan Approach' eight key design principles have been incorporated into the design of the proposed development. Notwithstanding this section of the Planning Statement, we also refer the Planning Authority to submitted Architectural Design Statement prepared by Davey+Smith Architects which also

details how the 'The Plan Approach' has been considered and incorporated into the design of the development (refer to Section 4 of same) in order to create a successful and sustainable new neighbourhood on the subject lands.



Fig. 8. Extract from Figure 1 of the CDP "Eight Design Principles".

1. Context - Consider existing natural, cultural and built heritage features and green infrastructure elements as well as social, economic and environmental factors that impact on an area.

The subject site is a greenfield site, zoned for residential development, located adjacent to both existing and permitted residential developments and the Dublin mountains. As already detailed in this Planning Statement, the applicant has been developing lands in the vicinity for residential development on a sustainable, phased, basis over the course of the last 10 years and the proposed development seeks to continue the delivery of new housing in the area and significantly contribute to the completion of development on the western side of the Ballycullen-Oldcourt LAP lands.

The proposed development has been designed to be complementary to and cognisant of its receiving environs, providing a scheme which:

- (i) is visually and physically connected with existing residential estates,
- (ii) provides for strong urban street frontage to the main link street for the Plan lands,
- (iii) has a variety of neighbourhood zones / character areas and housing typologies which respect the existing character of the area and provides for an appropriate level of variety and visual interest,
- (iv) has an ample provision of public open space which includes for the delivery of "Oldcourt Park" as identified by the Ballycullen-Oldcourt LAP,
- (v) takes into account the sloping nature of the site and appropriately responds to same in terms of housing typology, building height and stepped arrangement of buildings as necessary,

- (vi) provides for appropriate building heights (in the majority two & three storeys) with three storey buildings located in appropriate areas to create nodal points and variety,
- (vii) retains existing trees and hedgerows as much as feasibly possible and provides for supplementary planting to support loss,
- (viii) prioritises pedestrian and cyclist permeability and green infrastructure throughout, and
- (ix) provides for an efficient and viable level of density.

2. Healthy Placemaking – *Promote good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction.*

The proposed development provides for a quantum of public and communal open space which meets the requirements of the existing CDP and the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023).

The proposed development caters for an ample provision of public open space, which includes for the delivery of “Oldcourt Park” as identified by the Ballycullen-Oldcourt LAP. The proposed layout and the siting of buildings within the scheme has been carefully considered to ensure all public spaces are directly visible from dwellings thus providing passive supervision and an enhanced sense of safety. The proposed layout has also sought to retain existing trees and hedgerows as much as feasibly possible and provide for supplementary planting to support loss.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other permitted and existing public open space areas adjoining the site. Pedestrian and cyclist accessibility has been prioritised throughout to afford users ease of access to all open spaces within the development and to neighbouring developments / lands.

The proposed layout allows for full integration of the proposed development with adjoining residential estates, with pedestrian and cyclist permeability / connections to these adjoining estates provided for thus creating a safe and accessible scheme for both future residents and visitors. The proposed road network has been subject to an independent road safety audit as part of this application for permission and is designed in compliance with DMURS principles to ensure safe movement for all users within the development.

3. Connected Neighbourhoods - *Promote public transport and other transport facilities that mitigate dependence on cars, promote safe walking and cycling, while assisting with internal movements within neighbourhoods.*

Regarding public transport, the nearest existing bus stops are located approximately 1 km to the north of the western end of the site, at Killinenny Road, which is considered to be within a reasonable walking distance for commuter related trips. Notwithstanding same, the proposed development provides for future public transport infrastructure i.e. 2 no. bus stops on the proposed main link street allowed for, as agreed with the NTA, which will further promote public transport use and mitigate dependence on cars for future residents.

Regarding pedestrian and cyclist infrastructure, segregated pedestrian and cyclist infrastructure is proposed along the length of the main link street traversing the development, with ancillary off-road routes and connections also provided throughout, ensuring pedestrians and cyclists are prioritised within the development.

The proposed development also caters for an appropriate level of secure and covered communal bicycle storage areas for the proposed apartment and duplex units, with mid-terrace houses also being provided with individual secure and covered bicycle stores to the front of their properties. Details of same are set out on the submitted Davey+Smith drawing no. MP22 "Overall Lands – Proposed Bikes Locations". It is fully considered the proposed development promotes a transition to more sustainable transport modes as a priority.

4. Thriving Economy - Ease of access to and availability of good jobs and a good quality of life for the community at large.

The subject site is located within the lands identified as being subject to the Ballycullen-Oldcourt LAP, with the LAP noting the Plan lands are situated close to major employment centres to the north and west, including for Dublin city centre (approximately 12km to the north-east of the site and easily accessible via Junction 12 of the M50), Tallaght (approximately 5 km to the north-west of the site) and Citywest (approximately 6km to the west of the site). Given the locational context of the site, including proximity to key roads infrastructure in the vicinity and access to public transport services (both existing and potential future services), the proposed car parking provision, the ample provision of proposed bicycle parking as well as the provision of dedicated pedestrian and cyclist routes and infrastructure throughout the development, it is considered evident that future residents will have ease of access to, and availability of, good jobs, services and facilities and thus a good quality of life.

5. Inclusive and Accessible - High quality services, community infrastructure and open spaces accessible to all.

Were the subject site to be left undeveloped, it will remain an underutilised, zoned, and serviceable site that is inaccessible to the public. The proposed development provides for an efficient use of this zoned site, catering for residential development that will contribute to the receiving environs and supports the continued sustainability of nearby employment centres.

The proposed development caters for an ample provision of public open space, including the delivery of "Oldcourt Park" as identified by the Ballycullen-Oldcourt LAP. The proposed layout and the siting of buildings within the scheme has been carefully considered to ensure all public spaces are directly visible from dwellings thus providing passive supervision and an enhanced sense of safety. The proposed layout has also sought to retain existing trees and hedgerows as much as feasibly possible and provides for supplementary planting to support loss. Overall, over 30% of the site area is provided as public open space, designed to a high quality and catering for varying forms of recreation.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest throughout the development. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other permitted and existing public open space areas adjoining the site.

The proposed site layout plan allows for full integration of the proposed development with adjoining residential estates, with pedestrian and cyclist permeability / connections to these adjoining estates creating a safe and accessible scheme for both future residents and visitors. In addition, the proposed development provides for public transport infrastructure i.e. 2 no. bus stops on the proposed main link street allowed for, as agreed with the NTA, which will further promote public transport use and mitigate dependence on cars for future residents, ensuring ease of access to nearby employment centres (Dublin city centre, Tallaght, Citywest).

Set out further on in this Planning Statement (section 7.14.2) are details of the applicant's proposals in relation to the provision of community facilities, which has been agreed in principle with the Planning Authority, prior to the submission of this LRD planning application – please refer to same.

6. Public Realm - A real sense of place, positive purpose and local distinctiveness, where buildings are not only attractive but also safe and useful with lots of green and open spaces for people to spend time, relax and play.

The proposed layout and design ensure a strong urban streetscape is catered for along the length of the main link street traversing the development, with proposed dwelling typologies considering the sloping nature of the site to ensure visual amenity and a sense of place is promoted.

The design of the proposed buildings and housing typologies are complimentary to the existing and permitted adjoining developments at Dodderbrook and Ballycullen Gate, which are also being developed by the applicant, and the character of the wider receiving environs. The submitted Architectural Design Statement prepared Davey + Smith Architects illustrates how the proposed buildings will present to street frontages and adjoining developments, seamlessly fitting into the sloping topography of the site and creating passive surveillance throughout the development.

Landscaping plans for the proposed development, included as part of this application for permission, ensure that a variety of recreational activities are catered for, with soft and hard landscaped areas, as well as planting proposals, ensuring a high-level of variety and visual interest throughout the development. Details of same are set out in the submitted Landscape Design Rationale prepared by Gannon & Associates Landscape Architects and we refer the reader to same for a better understanding. By virtue of the proposed layout, future residents of the development will be able to easily access proposed public and communal open spaces as well as other permitted and existing public open space areas adjoining the site.

Animated and active frontages are promoted throughout the development via own door access units and the location / siting of proposed communal and public open space areas. The proposed layout caters for direct vehicular and pedestrian / cyclist permeability from Bohernabreena Road to Oldcourt Road, via the main link street traversing the development, with off-road permeable pedestrian and cyclist routes also catered for to ensure pedestrians and cyclists are a priority.

The proposal to develop the subject site for residential use, in compliance with the land-use zoning objectives attached to the site, will cater for increased occupancy and breathe new life into the area, with the proposed development designed to cater for four distinct neighbourhood zones of differing character and styles, thus creating well-defined areas within the overall development which will ensure the feeling of a sense of place for future residents.

7. Built Form and Mix – Promotes a mix of uses with appropriate increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure.

The layout of the proposed dwellings / buildings has been considered in terms of the overall location of the site within the Plan lands and the immediate surrounding context. The proposed development is designed to cater for four residential neighbourhood zones of differing characters and styles, thus creating distinct areas within the overall development which will ensure the feeling of a sense of place for future residents.

The proposed development provides for suitable building heights (in the majority two / three storey), with three storey buildings proposed in appropriate locations to create a level of visual interest and act as nodal points / minor recognisable landmarks within the development. Only 1 no. 3-4 storey building (i.e. Block C) is proposed, in a stepped arrangement. The proposed building heights and typologies also take into consideration the topography of the site, in particular the sloping nature of the site, views of the Dublin mountains to the south, and the residential amenity of existing and permitted residential developments which abut the site. This has been carefully considered as part of the submitted Landscape and Visual Impact Assessment carried out by Macroworks which is enclosed as Chapter 15 of the submitted EIAR and accompanying photomontages.

The architectural composition of the development takes cognisance of the locational context of this site to develop housing which is both compatible with this outer suburban area and complies with the objectives of both the CDP and the Ballycullen-Oldcourt LAP. The proposed houses/ apartment and duplex blocks are contemporary in style and layout, however, they compliment the style and character of the existing dwellings at Dodderbrook and the permitted dwellings at Ballycullen Gate, in terms of material finishes, but with variations in each of these parameters to ensure this development will have four distinctive character areas, in the form of four individual new neighbourhood zones within the proposed development.

8. Design and Materials - High quality design, materials and finishes and good quality landscaping with robust maintenance protocols for all large residential, commercial and employment developments.

Davey + Smith Architects and Gannon & Associates Landscape Architects have prepared the submitted architectural and landscaping proposals which, based upon the principles of good urban design, are put forward for permission. The proposed houses / apartments and duplex blocks are traditional in their scale but contemporary in style and layout, which is respectful of the style and character of the existing dwellings at Dodderbrook and the permitted dwellings at Ballycullen Gate, in terms of material finishes, but with variations in each of these parameters to ensure this development will have four distinctive character areas in the form of four individual new neighbourhood zones within the proposed development.

The landscape proposals have been designed to complement the semi-rural setting of the site and neighbouring lands in terms of biodiversity and SUDs features and will create an amenable development that will successfully assimilate into its setting as it matures over time. Please refer to the submitted architectural design statement and landscaping design rationale documents prepared by Davey + Smith Architects and Gannon & Associates Landscape Architects for further / full details.

4.1.6 Ballycullen-Oldcourt Local Area Plan, 2014 (as extended)

The Ballycullen-Oldcourt Local Area Plan, 2014, (as extended) (hereafter “LAP”) forms the basis for development of approximately 90 hectares (222 acres) of land, which are in the majority zoned objective ‘Res-N’ for new residential development, located at the Ballycullen-Oldcourt fringe, stretching across the foothills of the Dublin mountains, and forming a buffer to the existing suburban areas of Tallaght, Firhouse and Knocklyon.

As outlined above, we note that the LAP is due to expire and that by the time a decision is due on this LRD planning application, the LAP may have expired. Notwithstanding same, the CDP has zoned the application site for residential land use and also contains various policies / objectives relating to the subject lands, including designating it as a “Housing Capacity Site” in its Core Strategy and setting out roads objectives, all of which the proposed LRD adheres to. We consider that the spirit / principles for development as set out in the LAP have been carried over to the current CDP, to which the proposed development has had full regard. It is therefore considered that the permission being sought can be granted in line with the County Development Plan land use zoning objectives attached to the application site, as well as according with a wide range of national and regional planning policy, as detailed in the accompanying Statement of Consistency. Notwithstanding same, the following sets out how the proposed development complies with the LAP.

The Plan lands are bounded to the west by Bohernabreena Road, to the east by the M50, to the north by existing suburban development, including for the Allerton, Ely, Beechdale, Hunterswood, Woodstown and Dalriada estates, and to the south by the foothill of the Dublin mountains (Refer back to Figure 1 of this Statement for detail).

The LAP was extended in May 2019 and we understand is due to expire September 2024.

The overall objective of the LAP is to provide a development framework with residential densities appropriate to the unique location of the Plan lands, on the suburban edge of Dublin and at the foothills of the Dublin mountains. The LAP provides for the construction of approximately 1,600 no. dwellings (catering for approximately 4,600 persons) at a range of densities appropriate to the area.

The Plan lands are subject to several development constraints such as wayleaves for existing watermains and overhead ESB wires, extant planning permissions, and areas of steep topography. The presence of such constraints across the entirety of the Plan lands has resulted in the Plan lands being categorised into three areas for purposes of developing a sequenced rationale. These areas are categorised as follows: “Highly Constrained Land”, “Partially Constrained Land” and “Relatively Unconstrained Land”. Figure 9 below, illustrates these areas, as per the LAP, with light shading indicating “Highly Constrained Land” and dark shading indicating “Relatively Unconstrained Land”.



Fig. 9. Extract from the Ballycullen-Oldcourt LAP (Fig 4.1 of same) identifying "Development Areas Rationale".

As demonstrated in Figure 9 above, the subject site is identified as being in the majority on the "Partially Constrained Land"; however, the site is also located on parts of the "Highly Constrained Land" and "Relatively Unconstrained Land". Regarding the western side of the Plan lands i.e. where the subject site is situated, the LAP states the following relevant information about each category:

- **Highly Constrained Land:** *"The highly constrained areas of the Plan Lands coincide with major utility lines, areas already developed, existing and zoned open spaces and features of significant heritage and drainage value. A wide corridor of land in the western area of the Plan Lands is constrained by the high voltage 220kV overhead transmission lines. Further lands are constrained by watermains, which run diagonally across the entirety of the Plan Lands...."*
- **Partially Constrained Land:** *"The partially constrained areas relate largely to the upper slopes along the southern fringe of the Dublin Mountains where there is a relatively steep topography and the lands become visually prominent. Gradients range between 1:16 and 1:6 and would be difficult to develop at standard densities without the use of extensive engineering solutions such as retaining walls, shoring, embankments and cut platforms. Development of these lands could therefore have a significant impact on the context, landscape and setting of the Dublin Mountains including panoramic views, the transition between countryside and suburbs, heritage features and the natural slope and drainage of the area. On the western side of the Plan Lands the partially constrained areas occur mostly above the 108 metre contour to the south of the watermains with the exception of a steep section of lands located just above the 100 metre contour along Oldcourt Road to the south-west of Beechdale and lands adjacent to Bohernabreena Road.*
- **Relatively Unconstrained Land:** *"The relatively unconstrained areas of the Plan Lands largely comprise the more northern and lower lying areas that have a more gentle topography. These lands are not traversed by significant utility lines. On the western side, they generally occur to the north of the watermains....."*

The LAP also sets out a land use and density rationale which reflects the 'Res-N' zoning for the majority of the Plan lands. Land uses and densities are directed within three distinct areas, where the extent of development will vary depending on its location and setting in relation to the suburbs and the Dublin mountains/countryside. The three distinct character areas are categorised as follows: "Lower Slope" land; "Mid Slope" land; and "Upper Slope" land. Figure 10 below, illustrates these areas as per the LAP, with light brown shading indicating "Upper Slope" land and dark brown shading indicating "Lower Slope" land.



Fig. 10. Extract from the Ballycullen-Oldcourt LAP (Fig 4.6 of same) identifying "Land Use & Density Rationale".

As demonstrated in Figure 10 above, the subject site is identified as being, in the majority, on the "Mid Slope" land; however, the site is also located on parts of the "Lower Slope" and "Upper Slope" land. Regarding the western side of the Plan lands i.e., where the subject site is situated, the LAP states the following relevant information about each category:

- **Lower Slope land:** *"The lower slopes of the Plan Lands generally correspond with the Relatively Unconstrained lands identified under the Development Areas Rationale and relate to the more northern and lower lying areas that have a more gentle topography..... these lands are generally located close to existing medium density suburban development. Development on the lower slopes will primarily comprise low to medium density residential development....."*
- **Mid Slope land:** *"The mid slopes are generally located within the Highly Constrained Area described in the Development Areas Rationale, where the slope of the topography begins to accelerate towards the upper slopes. This area generally runs midway across the entirety of the Plan Lands in a linear manner. Development within this area will primarily comprise low density residential development"*.
- **Upper Slope land:** *"The upper slopes generally correspond with the Partially Constrained Areas described in the Development Areas Rationale. These lands comprise the most elevated and visually prominent areas of the Plan Lands, which rise towards and beyond the 120 metre contour. The Upper Slope Lands run closely along the entire southern fringe of the Plan Lands with the Dublin Mountains and is considered to be an area that is highly sensitive to development in terms of visual impact and impact on natural drainage. Development within this area will primarily comprise very low density residential development"*.

The LAP also details the required residential standards for specific character areas (e.g. public open space provision and building heights etc.). To that end, judicious consideration has been paid to the locational context of the subject site in the preparation of the proposed development, including the existing topography and how the site interfaces with adjoining developments, as well as the various requirements of the LAP and the more up-to-date standards provided for in the existing CDP and other relevant Ministerial Guidelines i.e., the Sustainable Urban Housing Design Standards for New Apartments (2023) and the Sustainable Residential Development and Compact Settlements Guidelines (2024). This Planning Statement (section 7) details the specifics of the proposed development - please refer to same for further details. We also refer the Planning Authority to the accompanying "Statement of Consistency" prepared by Armstrong Fenton Associates, which is submitted as a separate, standalone, document, for further / full details of the proposed development's compliance with the LAP which, for the avoidance of repetition, are not repeated in this Statement.

5.0 Planning History

5.1 There are no extant permissions currently attached to the subject site; however, a synopsis of site's planning history, and that of adjoining lands which are considered to be of relevance, is set out below:

- **Ref. SD17A/0041 (An Bord Pleanála Ref. PL06S.249367):** Permission was granted to HWBC Allsop and Capami Ltd. on 2nd July 2018 for the development of the Main Link Street detailed in the Ballycullen-Oldcourt LAP, with access onto the Oldcourt Road at Gunny Hill to the east, and the Bohernabreena Road to the west. The Main Link Street consisted of a single 7 meter wide carriageway including footpaths, cycle paths, bus bays, traffic calming measures, public lighting and tree planted grass margins having total length of approximately 1,516 meters on a net development area of approximately 7.7 ha and provided access and connections to lands designated for residential development in the Ballycullen-Oldcourt LAP. The Main Link Street incorporated pipes and ducts to accommodate for future services including surface water attenuation and other piped and wire services. This permission was not implemented and expired in October 2023.

Works under the above permission never commenced; however, the access from Oldcourt Road (the R113) and an initial section of the Main Link Street was constructed by the applicant under a subsequent permission for residential development (i.e. under Grant of Permission Ref. SD17A/0468 – Ballycullen Gate).

The current development proposal takes into consideration the route of the previously permitted Main Link Street and seeks to construct the remainder of this street in a coherent manner to provide for connectivity from Oldcourt Road (the R113) to Bohernabreena Road, which is an objective of both the existing South Dublin CDP and the Ballycullen-Oldcourt LAP and will facilitate the subject land's availability for new residential development.

5.2 In September 2019, the current applicant submitted three concurrent planning applications for residential development which traversed parts of the subject site. These three applications were refused permission, the details of which are as follows:

- **Ref. SD19A/0137:** Permission was sought by Capami Ltd. for a residential development comprised of 73 no. dwellings on a site measuring 4.1 hectares, located east of Bohernabreena Road & south of Oldcourt Road, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan 2014 (as amended), in the townland of Bohernabreena, Dublin 24. The development proposal was comprised of 1 no. three storey 4 bed detached house, 36 no. two and three storey 3 & 4 bed semi-detached houses, 12 no. two storey 3 bed terraced houses and 24 no. 1, 2 & 3 bed duplex & apartment units in 3 no. two & three storey buildings. Access to the development will be via the previously permitted Main Link Street for the Ballycullen-Oldcourt Local Area Plan (under Reg. Refs. SD17A/0041 & PL06S.249367). The development also included for all associated site development works, car parking, open spaces, landscaping etc. Permission for this development was refused by South Dublin County Council on 7th October 2019.
- **Ref. SD19A/0139:** Permission was sought by Capami Ltd. for a residential development comprised of 46 no. dwellings on a site measuring 4.1 hectares, located east of Bohernabreena Road & south of Oldcourt Road, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan 2014 (as amended), in the townland of Bohernabreena, Dublin 24. The development proposal was comprised of 9 no. one storey 3 bed detached houses, 1 no. two storey 3 bed detached house, 20 no. two storey 3 & 4 bed semi-detached houses and 16 no. 1 & 2 bed duplex & apartment units in 2 no. two storey buildings. Access to the development was to be via the previously permitted Main Link Street for the Ballycullen-Oldcourt Local Area Plan

(under Reg. Refs. SD17A/0041 & PL06S.249367). The development also included for all associated site development works, car parking, open spaces, landscaping etc. Permission for this development was refused by South Dublin County Council on 7th October 2019.

It should be noted that matters relating to the delivery of the previously permitted Main Link Street were cited as one of the reasons to refuse permission under both Ref.s SD19A/0317 and SD19A/0139. However, the current LRD proposal rectifies this issue.

- **Ref. SD19A/0138 (An Bord Pleanála Ref. ABP-306617-20):** Permission was sought by Capami Ltd. for a residential development comprised of 52 no. dwellings on a site measuring 2.66 hectares, located east of Bohernabreena Road & south of Oldcourt Road, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan 2014 (as amended), in the townland of Bohernabreena, Dublin 24. The development proposal was comprised of 1 no. three storey 4 bed detached house, 1 no. two storey 3 bed detached house, 32 no. two and three storey 3 & 4 bed semi-detached houses and 18 no. 1 & 2 bed apartment units in 1 no. three storey apartment block. Access to the development was to be via the previously permitted Main Link Street for the Ballycullen-Oldcourt Local Area Plan (under Reg. Refs. SD17A/0041 & PL06S.249367). The development also included for all associated site development works, car parking, open spaces, landscaping etc.

South Dublin County Council issued a notification of decision to grant permission for the above development on 14th January 2020; however, the decision was subject to a third-party appeal and permission was refused by An Bord Pleanála on 8th September 2020.

An Bord Pleanála cited the reason to refuse permission as follows:

"Having regard to the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) issued by the Department of the Environment, Heritage and Local Government in May 2009 and the Urban Development and Building Heights, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2018 in relation to housing density in outer suburban/greenfield sites in cities and larger towns, it is considered that the proposed development would not be developed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage, given the site location on zoned land and in an area that has been earmarked for residential development in both the South Dublin County Council Development Plan, 2016-2022 and the Ballycullen-Oldcourt Local Area Plan, 2014 and noting that the density of the proposed development is at the lower end of the density range as set out within the stated Local Area Plan.

It is considered that the density proposed would be contrary to the 2009 Ministerial Guidelines, which indicate that net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency and contrary also to the 2018 Ministerial Guidelines which affirm under Specific Planning Policy Requirement 4, that the minimum densities for greenfield or edge of city locations set out in the 2009 Ministerial Guidelines must be secured. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area".

With regard to the above applications for permission, it is considered that the reasons for refusal given by both South Dublin County Council and An Bord Pleanála generally related to the piecemeal nature of the development proposals, issues regarding the delivery of the Main Link Street (which are now fully resolved) and density. It is now put forward that the current LRD proposal, which seeks to fully develop the remainder of the western side of the Plan lands in a coherent manner as part of one application for LRD permission, fully overcomes, and addresses, the reasons for refusal given in the above decisions.

5.3 In addition to sections 5.1 and 5.2 above, the following section provides for a synopsis of the relevant planning history attached to the adjoining / surrounding lands, all of which has been / are being successfully delivered by the applicant.

- **Ref. SD14A/0180:** Permission was granted to Capami Ltd. on the 31st July 2015 for a residential development comprising of 135 no. dwellings on a site area of 4.82 hectares, located south of Oldcourt Road, Oldcourt, Firhouse, Dublin 24. Access to the development was via a new vehicular entrance from Oldcourt Road. The development, as applied for, consisted of 138 no. dwellings comprised 4 no. 4 bed 2 storey detached houses, 101 no. 3 & 4 bed 2 storey semi-detached houses, 25 no. 3 bed 2 storey terraced houses and 8 no. apartments in 4 no. 2 storey end of terrace units and included all associated site development and infrastructural works, car parking, open spaces and landscaping. The grant of permission received provided for the development of 135 no. dwellings only which formed Phase 1 of development of the applicant's lands within the Ballycullen-Oldcourt LAP boundaries.

The above development is now completed, lies to the immediate north-east of the subject site, and is known as Dodderbrook (Phase 1).

- **Ref. SD15A/0150:** Permission was granted to HWBC Allsop on 27th January 2016 for a residential development comprising 79 no. two storey houses, a new vehicular access from Oldcourt Road, pedestrian access routes, internal roads and footpaths, open space including children's play area, boundary treatments, hard and soft landscaping, changes in levels, ancillary surface water attenuation areas and all site development works above and below ground at Oldcourt Road, Ballycullen, Dublin 24.
- **Ref. SD18A/0025:** Permission was granted to Capami Ltd. on 5th June 2018 for amendments to the aforementioned Ballycullen Green (Ref. SD15A/0150) resulting in a change of house type and increase in number of units.

The above development is now completed, lying to the east of the subject site, and is known as Ballycullen Green.

- **Ref. SD16A/0059 (An Bord Pleanála Ref. PL06S.247693):** Permission was granted to Capami Ltd. on 9th November 2016, for the development of a playing pitch, including associated site works, on a site area of 1.97 hectares, located at Gunny Hill, on Oldcourt Lane, south of Oldcourt Road. This application was the subject of an appeal to An Bord Pleanála who granted permission for same on 3rd April 2017 under Ref. PL06S.247693.

The above development is located to the immediate south of the above mentioned Ballycullen Green (i.e., to the east of the subject site) and is now completed.

- **Ref. SD17A/0121 & PL 06S.249294:** Permission was granted to Capami Ltd. on the 23rd January 2018 for a residential development consisting of 133 no. dwellings and a crèche on a site area of 4.64 hectares (11.4ac), located south of Oldcourt Cottages and north of the ESB wires in the townland of Bohernabreena, Oldcourt, Ballycullen, Dublin 24. The development provided for a new access point via an adjoining residential development known as Dodderbrook (permitted under Reg. Ref. SD14A/0180) which is accessed from Oldcourt Road. The development comprised of 3 no. 4 bed 2 storey detached houses, 90 no. 3 & 4 bed 2 storey semi-detached houses, 27 no. 3 bed 2 storey terraced houses and 6 no. 3 bed duplexes with 3 no. 2/3 bed duplex apartments in a 3 storey building and 4 no. 2 bed apartments over two floors and a 2

storey crèche (423m²). The development also included for all associated site development and infrastructural works, surface water with attenuation, piped and wired services, car parking, open spaces and landscaping etc.

The above development represents Phase 2 of the Dodderbrook estate and is now completed, lying to the immediate north of the subject site.

- **Ref. SD17A/0468:** Permission was granted to Capami Ltd. on 22nd October 2018 for the development of 64 no. dwellings on a site area of 3.8 hectares located to the south of Oldcourt Road, Oldcourt, Firhouse, Dublin 24. Access to the development is via a vehicular entrance from Oldcourt Road. The permitted development consisted of 24 no. 2 storey semi-detached houses, 10 no. 2 bed semi-detached dormer houses, 14 no. 2 and 3 bed detached houses and 16 no. 2 bed apartments in 3 no. 2 storey buildings. The development also included for all associated site development works, car parking, open spaces and landscaping.
- **Ref. SD22A/0356:** Permission was granted to Capami Ltd. on 6th March 2023 for amendments to the aforementioned Ballycullen Gate (Ref. SD17A/0468) resulting in a change of house type and increase in number of units.

The above development is currently under construction by the applicant, lying to the east of the subject site, and is known as Ballycullen Gate.

- **Ref. SD19A/0104 (An Bord Pleanála Ref. ABP-305800-19):** Permission was granted to Capami Ltd. for residential development on 30th March 2020, following a third-party appeal. The development, as applied for, comprised 24 no. houses on an infill site, located south of Oldcourt Road, to the northeast of and adjacent to Dodderbrook Phase 1. As a result of revisions to scheme required by Additional Information, permission was granted for 21 no. dwellings.

The above development is currently under construction by the applicant, lying to the north-east of the subject site (fronting onto Oldcourt Road), and will ultimately form part of the existing Dodderbrook (Phase 1) estate.

- **Ref. SD23A/00083:** Permission was granted on 5th March 2024 for a residential development on a site measuring c. 2.56 hectares, located to the south / south-west of the Oldcourt Road (the R113), Oldcourt, Dublin 24, and within the lands designated for the Ballycullen-Oldcourt Local Area Plan 2014 (as extended). The proposed development, as initially applied for, consists of 71 no. dwellings comprised of 41 no. 3 & 4 bed, two and three storey, detached, semi-detached and terraced houses and 30 no. 2, 3 & 4 bed apartments & duplex units accommodated in 1 no. two/three storey block and 2 no. three storey blocks. Access to the proposed development will be from Oldcourt Road via permitted roads infrastructure previously granted permission under Planning Ref.'s SD17A/0468 and SD17A/0041 & PL06S.249367. The proposed development also includes for car parking, bicycle parking, bin storage, communal open spaces, public open space, pedestrian & cyclist connections, landscaping & boundary treatments, drainage connections, road infrastructure etc. and all associated site development works on a site of c. 2.56 hectares.

This permitted development of 71 no. units has not yet commenced construction and is located to the immediate east of the subject site, however, construction is due to commence soon.



- **Ref. SD23A/00083:** Permission and retention permission was granted on 28th November 2017 to Patrick and Gemma Grimes for 5th March 2024 to (1) Retain office unit No. 3 to the rear section of already approved single storey building, housing office unit No. 1 and office unit No. 2; (2) change the use of all 3 office units and redesign the internal layouts to give one 4 bedroom residential unit for renting; (3) redesign the external windows and door units to comply with Building Regulations Part B-Fire and (4) all ancillary ground works.

This permitted development lies in the south-western part of the subject site and is one of the structures proposed to be demolished as part of the proposed LRD. Consent to include these lands has been provided by the landowner Mr. Pat Grimes and is enclosed with this application.

Dodderbrook (Phase 2)	Dodderbrook (Phase 1)	Permitted 21 no. units Ref. SD19A/ 0104 (ABP-305800-19)	Permitted 71 no. units Ref. SD23A/0083
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Subject LRD Site (Indicative
Site Boundary Outlined in Red)

Ballycullen Gate (under construction - 71 no. units)

Gunny Hill Playing Pitch

Ballycullen Green

Fig. 11. - Local Planning History / Context of Western Plan (LAP) Lands.

6.0. Social & Affordable Housing - Part V Proposal

6.1. The residential element of the proposed LRD provides for 523 no. dwellings. To this end, on behalf of the applicant, we wish to state for clarity, that the applicant intends to fully comply with the requirements of SDCC's Housing Department in compliance with Part V, Section 96 (3)(b)(i) of the Planning and Development Act 2000 (as amended by the Affordable Housing Act 2021) within the development, should a condition in relation to Part V be attached to a forthcoming grant of permission.

6.2. Based on the date of purchase of the subject site and the requirements of Affordable Housing Act 2021, the applicant acknowledges there is a requirement to put forward a mixture of 10% and 20% of the total number of dwellings proposed as Social and Affordable housing, dependent on the date of purchase of the various land parcels that comprise the entire application site. To that end, we enclose Davey+Smith drawing no. MP11 "Overall Lands – Proposed Part V Units" which identifies the various land registry folio numbers of the lands that comprise the overall application site, and which parcels require a 10% Part V provision and a 20% Part V provision.

6.3. Please refer to the enclosed drawing no. MP11 "Overall Lands – Proposed Part V Units", which provides the following information:

- Overlays the land registry folio numbers onto the proposed site layout plan,
- Identifies which folios are subject to a 10% Part V obligation or a 20% Part V obligation,
- Details the total quantum of units proposed in each folio and corresponding 10% or 20% Part V obligation, which is as follows:

- Folio DN146820F - 38 units (20%)
- Folio DN146820F - 92 units (20%)
- Folio DN206827F - 26 units (20%)
- Folio DN298523F - 81 units (10%)
- Folio DN127546F - 11 units (20%)
- Folio DN51244F - 140 units (20%)
- Folio DN208523F - 24 units (10%)
- Folio DN8245F - 74 units (20%)
- Folio DN124178F - 37 units (20%)
- Total = 523 no. units

The folios listed provide for a total of 418 no. units that have a 20% Part V obligation and 105 no. units that have a 10% Part V obligation.

This equates to:

- 20% of 418 = 84 units
- 10% of 105 = 11 units

Total = 95 no. units

6.4. Taking all of the above into account, and in compliance with Part V, Section 96 (3)(b)(i) of the Planning and Development Act 2000 (as amended by the Affordable Housing Act 2021), the applicant proposes to provide 95 no. units as Social and Affordable Housing, comprised of 33 no. duplex units and 62 no. apartments.

6.5. Please refer to the submitted details and costs of the proposed 95 no. Part V units that has been prepared by PK O'Brien & Associates on behalf of the applicant, Capami Ltd. The enclosed Part V proposal was submitted to the Housing Department of South Dublin County Council and a letter confirming the applicant's engagement with the Housing Department of SDCC was received on 227th August 2024 confirming same – please also refer to same enclosed.

6.6. The submitted information is intended to provide a reasonable estimate of the costs and values of the proposed Part V units based on construction costs and values prevailing at the time of this application. The information set out is for the purposes of facilitating the planning application and will be subject to finalisation and formal agreement with the Local Authority. The ultimate agreement with regard to compliance with Section 96 of the Act is dependent



upon receipt of a final grant of permission and on the site value at the time the permission is granted. The applicant intends to fully comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and the Housing Strategy of South Dublin County Council with respect to the provision of Social and Affordable Housing.



7.0. Proposed Development

7.1. Introduction

Having thoroughly considered:

- (i) the planning history of the site,
- (ii) the pattern of existing residential development in the immediate vicinity,
- (iii) the site's locational context in relation to its location at the edge of the built up area and the Dublin mountains,
- (iv) the site's sloping topography,
- (v) the feedback received at both section 247 LRD "Stage 1" pre-planning consultation and Stage 2 "LRD" meeting as well as the information provided to us by the Planning Authority in their LRD Opinion Ref. LRDP001/24,
- (vi) the policies and objectives of the existing South Dublin CDP and the Ballycullen-Oldcourt LAP, as well as current national and regional policy, guidance, and standards, including for section 28 Ministerial guidelines,

our client, Capami Ltd. now submits this LRD planning application to develop the subject site.

7.2. Proposal

As outlined above, the submission of this LRD application follows on from (a) a S.247 pre-planning meetings with SDCC on 30th June 2023 (under Ref. LRDP010/23), (b) the Stage 2 LRD pre-planning meeting with the Planning Authority, held on 1st March 2024 (under Ref. LRDP001/24), and (c) receipt of the LRD Opinion on 28th March 2024, again under Ref. LRDP001/24.

This application for a Large-Scale Residential Development (LRD) is detailed in full below, as per the public notices:

Capami Ltd. wishes to apply for a seven year planning permission for a Large-Scale Residential Development (LRD) on a site measuring c.20.4Ha, located in the townlands of Bohernabreena, Oldcourt, and Killinenny, Dublin 24. The development site is located to the east of Bohernabreena Road, north and east of Bohernabreena cemetery, south and south-east of St. Anne's GAA club, south and south-west of the Dodderbrook residential estate, west of the Ballycullen Gate residential development (currently under construction) and west of Oldcourt Road (R113).

The proposed development consists of 523 no. residential units comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 2-3 & 3-4 storey blocks (i.e. Blocks A, B2 & D, and 2 no. Blocks B1 & 2 no. Blocks C), along with a 2 storey childcare facility of c. 457sq.m.

Private amenity space for the residential units is provided in the form of rear gardens for houses and ground floor terraces / upper floor balconies for apartments and duplex units. The proposed development provides for a total of c. 7.3Ha of public open space, and c. 5,505sq.m of communal open space associated with proposed residential units.

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site, via 2 no. accesses, located off Bohernabreena Road, (ii) from the north of the site, via 1 no. access at Dodderbrook Place, and (iii) from the east of the site, via Oldcourt

Road (R113) and via adjoining residential development at Ballycullen Gate. The proposed development includes for pedestrian and cyclist connections and accesses throughout the proposed development and to adjoining lands to the north at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

The proposed development includes the demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06sq.m).

The proposed development provides for (i) all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations, (ii) public open spaces (c. 7.3Ha), (iii) communal open spaces (c. 5,505sq.m), (iv) hard and soft landscaping and boundary treatments, (v) surface car parking (746 no. car parking spaces, including EV parking), (vi) bicycle parking (1,268 no. bicycle parking spaces), (vii) bin & bicycle storage, (viii) public lighting, and (ix), plant / PV panels (M&E), utility services & 5 no. ESB sub-station/kiosks, all on an overall application site area of c.20.4Ha.

Having regard to the site's land-use zoning objectives, along with its planning history and locational context, it is fully considered the proposal to develop housing on the subject site is acceptable. The subject site is located on lands that are zoned for residential land use, forming a major landholding on the western side of the Ballycullen-Oldcourt LAP lands, and also being identified as a Housing Capacity Site in the Core Strategy of the CDP.

The current proposal essentially seeks to develop the majority of the western side of the Plan lands, connecting Oldcourt Road (the R113) and Bohernabreena Road by delivering much needed new housing, with appropriate regard having been given to the objectives of both the Ballycullen-Oldcourt LAP and the existing South Dublin CDP, as applicable.

This application seeks permission for the development of 523 no. dwellings, comprised of:

- 255 no. 2, 3 & 4 bed, 2 & 3 storey detached, semi-detached and terraced houses,
- 64 no. 1, 2 & 3 bed Urban Duplexes – "E1, E2, E3 & E4 types" in 9 no. 3 storey buildings,
- 142 no. 2 & 3 bed apartments/duplex units in Duplex Blocks A, B, C, D and E1, E2 & E3 in 11 no. 3 storey buildings,
- 62 no. 1, 2 & 3 bed apartments in Blocks A, B1, B2, C and D in 7 no. 3 and 3-4 storey buildings,
- A 2 storey creche of c.457m².

[Note: we are counting the proposed apartment Block B1 as 2 no. buildings and Block C as 2 no. buildings].

Please also refer to section 7.7 of this Planning Statement for full details on the proposed dwelling mix.

The proposed development provides for:

- (i)** all associated site development works above and below ground, including 2 no. underground foul sewerage pumping stations,
- (ii)** public open spaces (c. 7.3 Ha), including the provision of "Oldcourt Park" which is a c.2.3Ha park,

- (iii) communal open spaces (c. 5,505m²),
- (iv) hard and soft landscaping and boundary treatments,
- (v) surface car parking (746 no. spaces including EV parking),
- (vi) bicycle parking (1,268 no. bicycle parking spaces),
- (vii) bin & bicycle storage,
- (viii) public lighting,
- (ix) plant (M&E), utility services & 5 no. ESB sub-stations/kiosks, and,
- (x) demolition of all existing structures on site, including 2 no. single storey dwellings and outbuildings/sheds (total demolition area: c. 4,152.06m²).

7.3. Density

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 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. LRDP001/24 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 CDP 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.

7.4. Design

Given the scale of the site, the development has been designed to cater for four distinct neighbourhood zones which will ensure the development caters for individual character areas, each with their own sense of place and community.

We refer the reader to the following Davey + Smith Architects drawings which illustrate the site layout plans for each of these zones:

- Neighbourhood Zone 1 – drawing no. MP18
- Neighbourhood Zone 2 – drawing no. MP19
- Neighbourhood Zone 3 – drawing no. MP20
- Neighbourhood Zone 4 – drawing no. MP21

Details of the overall design concept, urban design principles and materiality applied to the proposed development are set out in the submitted Architectural Design Statement prepared by Davey + Smith Architects – please refer to same.

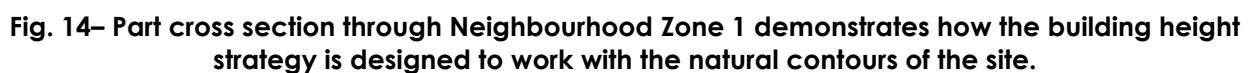
7.4.1 Neighbourhood Zone 1 / Character Area 1

Neighbourhood Zone 1 is located in the south-eastern part of the application site and abuts permitted development at Ballycullen Gate (currently under construction to the east). As one enters the lands from the Oldcourt Road, this zone will be the first one encounters, which is bounded by the main link street and designed around the series of hedgerows that make up this part of the site. This neighbourhood is located on the part of the site with the most significant slope, rising from the main link street along the north to the roughly parallel boundary to the south, defined by a hedgerow. The north-south aligned hedgerows further define the developable plots in this area, and large public open spaces have been designed around each of these natural landscape features. The dwelling typologies and the layout of this neighbourhood have been designed to provide an optimum form of development on a sloped site. A three storey duplex/townhouse style unit is proposed along the main link street on the lower part of the site, which provides a strong street frontage.



Fig. 12 – Proposed view along the main link street in Neighbourhood Zone 1 looking south

The split level house type along the southern boundary provides an opportunity to incorporate a strong design and placemaking solution to a stepped condition at the upper contour. The drawings of the house type illustrated in Fig. 13 overleaf detail how the stepped condition is incorporated both into the floor plan and elevation by providing a lower level parking and bin storage bay with planting over and an upper level garden to the side.



The view illustrated in Fig. 15 above is taken along the southern boundary of the site [with the highest contour level being 114mOD]. The split level housing type is dual aspect in nature with private open space situated to the side. In this manner, the landscape along the southern boundary can be developed as a pedestrian and jogging route connecting the larger open spaces and overlooked by the low level gables of each house.

Hedgerows are maintained and incorporated into the landscape design, with the proposed open spaces providing a visual connection to the mountains to the south and the proposed "Oldcourt Park" to the north on the opposite side of the main link street. Within the open spaces in this neighbourhood zone, the three linear parks, seamlessly connected through a shared surface to "Oldcourt Park, uphold the core concept of sinuous lines and ecological harmony. The existing hedgerows have been carefully preserved, and thoughtfully designed activity zones, natural play spaces, and comfortable seating and resting areas have been integrated.

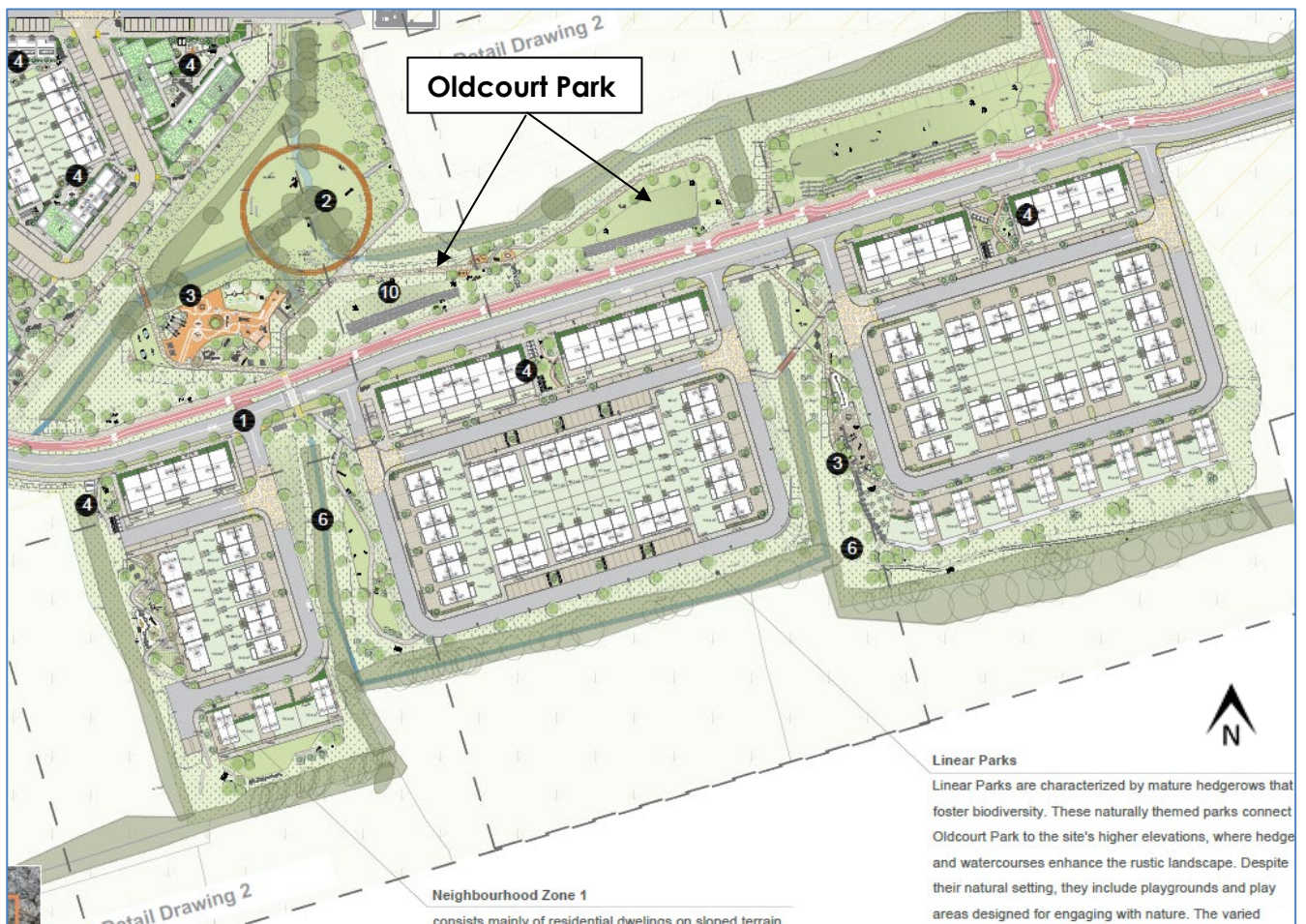


Fig. 16 – Proposed landscape strategy for Neighbourhood Zone 1, with visual and physical links to the proposed "Oldcourt Park"

7.4.2 Neighbourhood Zone 2 / Character Area 2

Neighbourhood Zone 2 is located in the centre of the application site, north of the proposed main link street. It is bounded to the north by the existing pylon corridor, and also directly abuts Oldcourt Park to its east. Access from Neighbourhood Zone 2 is afforded to Dodderbrook to the north, at Dodderbrook Place, as required by the CDP (refer to zoning map no. 9).

The conditions of the boundary parameters [link street; park; pylon corridor] have created a triangular plot with a gentle gradient that runs from west to east across the site. The residential dwellings are arranged in compliance with the Sustainable Residential Development and Compact Settlements Guidelines. Duplex and apartment blocks (3 storeys) are designed at the ends of each compact housing cell as bookends, providing frontage to the public realm and a point of urban articulation onto both the pylon corridor to the north and Oldcourt Park to the south/east. Compact terraced housing is located between these duplex and apartment building bookends. Pedestrian and cycle permeability through the site is prioritized in the design layout. Landscape opportunities along the permeable street design prioritises pedestrian movement and interactions, as illustrated in Fig. 17 while an urban pocket park is provided centrally on the longer cell to the west – facing onto the main link street.



Fig. 17 – View of proposed development overlooking Oldcourt Park in Neighbourhood Zone 2

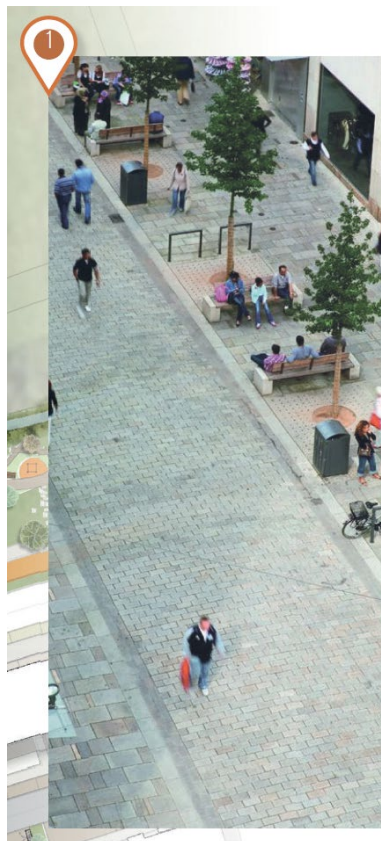


Fig. 18 – View of proposed development overlooking Oldcourt Park in Neighbourhood Zone 2

Open community spaces, linear gardens, picnic areas and playgrounds are proposed as part of the landscape design for Neighbourhood Zone 2, to promote integration between residents and the surrounding landscape. These shared places offer comfortable seating and shared surfaces, encouraging social interaction and strengthening community ties. In addition, the inclusion of shared surfaces creates an environment conducive to socialising, where residents can connect not only in the designated spaces, but also when walking along the shared pathways.



Fig. 19 – Proposed landscape strategy for Neighbourhood Zone 2



NEIGHBOURHOOD ZONE 02

7.4.3 Neighbourhood Zone 3 / Character Area 3

Neighbourhood Zone 3 is located in north-western part of the application site, adjacent to the proposed entrance to the scheme from the Bohernabreena Road, and north of the proposed main link street. Neighbourhood Zone 3 abuts St. Anne's GAA grounds to the north, while to the south is the existing pylon corridor, along which the main link street continues onto the Bohernabreena Road.

This portion of the lands is generally flat with light gradients in parts. A strong, urban street frontage is provided along the main link street to the south and to the pylon corridor beyond, framing this open area so that it can serve as additional amenity space and landscaped parkland. The dwellings are designed around a central park and pedestrian permeability is prioritised by the placement of connecting pocket parks that break up the housing cells. The housing layout is designed in accordance with the Sustainable Residential Development and Compact Settlements Guidelines and is made of up compact cells comprising two and three bed terraced housing types, with part two and three storey one and two bed duplex and apartment types located to frame the pocket parks. Neighbourhood Zone 3 also accommodates a standalone 2 storey crèche facility.



Fig. 20 – Proposed two and three storey townhouse façades in Neighbourhood Zone 3

The back to back housing terraces are configured with a 16m separation distance from rear elevation to rear elevation and the private open spaces for these houses exceed 40sq.m for three bed types or 50sq.m for four bed types. Parking for all units in these designed compact neighbourhoods is provided by way of shared surface parking at a maximum ratio of 2 units per dwelling. In this manner parking is provided within close proximity to dwelling entrances. A shared private open space is provided to the rear of the bookend buildings which comprise a mixture of own door ground floor apartments and own door upper level duplex dwellings. In addition to the shared open space, the ground floor dwellings each have a private rear patio that adjoins the communal open space.

As one enters the scheme from Bohernabreena Road, there are 2 no. blocks of 3 storey duplexes (Duplex Blocks E1 & E 2) which creates a strong urban street frontage to the main link street. Parking for these duplex blocks is provided to rear, with a contemporary with south facing terrace to front – refer to Fig. 21 overleaf.



Fig. 21 – Proposed three storey duplex units provide a strong urban edge to the main link street in Neighbourhood Zone 3

Pedestrian permeability is prioritised whereby a linked sequence of pocket parks and central public open space provides a pedestrian priority route through the site linking the GAA grounds to the north to the park designed around the pylon corridor to the south.

The landscape design for Neighbourhood Zone 3 includes a dynamic area for teenagers, featuring a tennis table, half a court, and fitness equipment which is located in the main area of open space, along the main path connecting to the Bio-Retention Park to the south in Neighbourhood Zone 4. The pathway is enhanced with activities and linear gardens, aimed at fostering social interaction. Additionally, a playground and an informal plaza have been proposed near the crèche, expanding leisure options and strengthening community ties, particularly for families with young children. The goal is to transform the environment into a vibrant space, promoting the well-being of the entire community.



Fig. 22 – Proposed landscape design for Neighbourhood Zone 3 with teen play areas catered, identified by no.s 1, 2 & 3 above

7.4.4 Neighbourhood Zone 4 / Character Area 3

Neighbourhood Zone 4 is located in western part of the application site, south of the main link street, and includes the proposed secondary access from the Bohernabreena Road. It is bounded to the north by the existing pylon corridor and to the south by the Bohernabreena Cemetery grounds.

Provision is made at the east of this development cell for the future realignment of the pylon corridor. A strong building line is positioned along the boundary with the pylon corridor and future corridor, allowing this space to become a defined amenity zone south and west of the main link street and bordering the proposed new neighbourhood zone. The development plot is comprised of terraced houses, the proposed urban duplex type E unit, and duplex blocks addressing the bio-retention park, with the proposed dwelling typologies configured in accordance with the Sustainable Residential Development and Compact Settlements Guidelines. A looped road connects Bohernabreena Road to the west with the main link street to the east. Shared pedestrian streets, a park and a pocket park are arranged to provide pedestrian priority permeability and placemaking through the development.

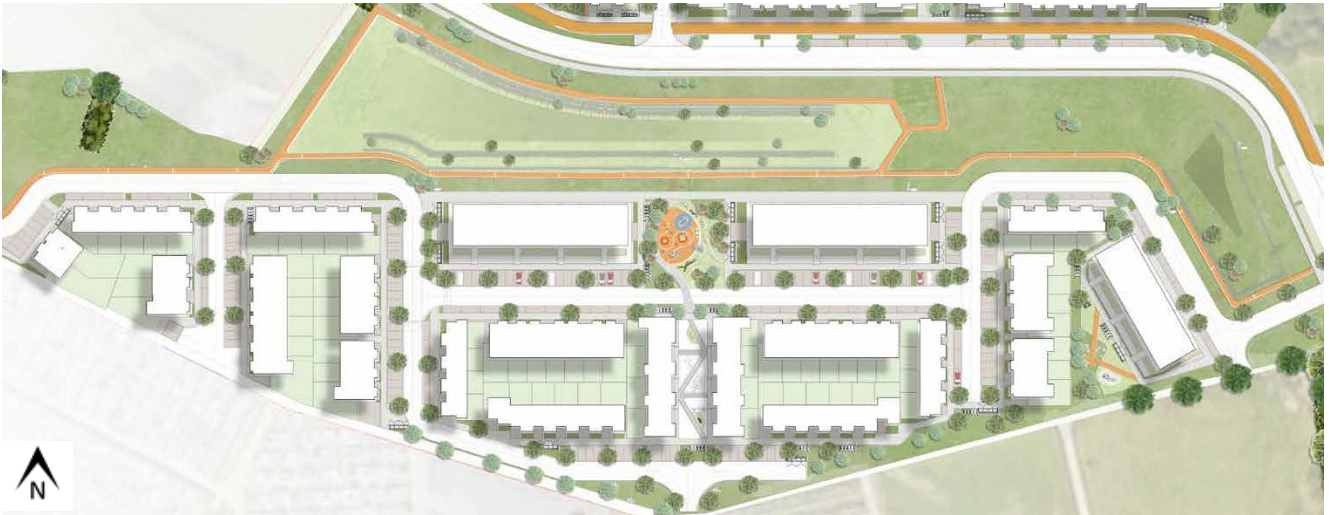


Fig. 23 –Neighbourhood Zone 4

A key landscape feature of Neighbourhood Zone 4 is the proposed bio-retention park, which is characterized by its sinuous and curvy lines and is designed to blend harmoniously with the natural environment and the park's layout. It serves a crucial ecological role by acting as a sustainable stormwater management system, mitigating water runoff effects. Through its strategically designed depressions and vegetation, the park effectively absorbs, filters, and cleanses stormwater, removing pollutants and preventing them from contaminating local water bodies. This function not only protects the environment but also improves the quality of nearby water resources. Beyond its environmental benefits, the bio-retention park enhances community well-being with its winding pathways and lush greenery, creating a peaceful space for recreation, relaxation, and nature connection. The running track, which follows the park's organic lines, promotes physical activity, encouraging a healthy lifestyle for residents and visitors. In essence, the bio retention park exemplifies sustainable urban planning by seamlessly integrating aesthetic appeal with ecological functionality, providing a natural oasis within the urban landscape.

The extension of the park's main path has been developed, giving rise to new activity areas. This expansion includes the implementation of a playground and fitness area, as well as proposed gardens and a natural play zone next to a mitigation area. This extension not only promotes connectivity between the park and the residences, but also provides additional spaces for recreational and wellness activities.

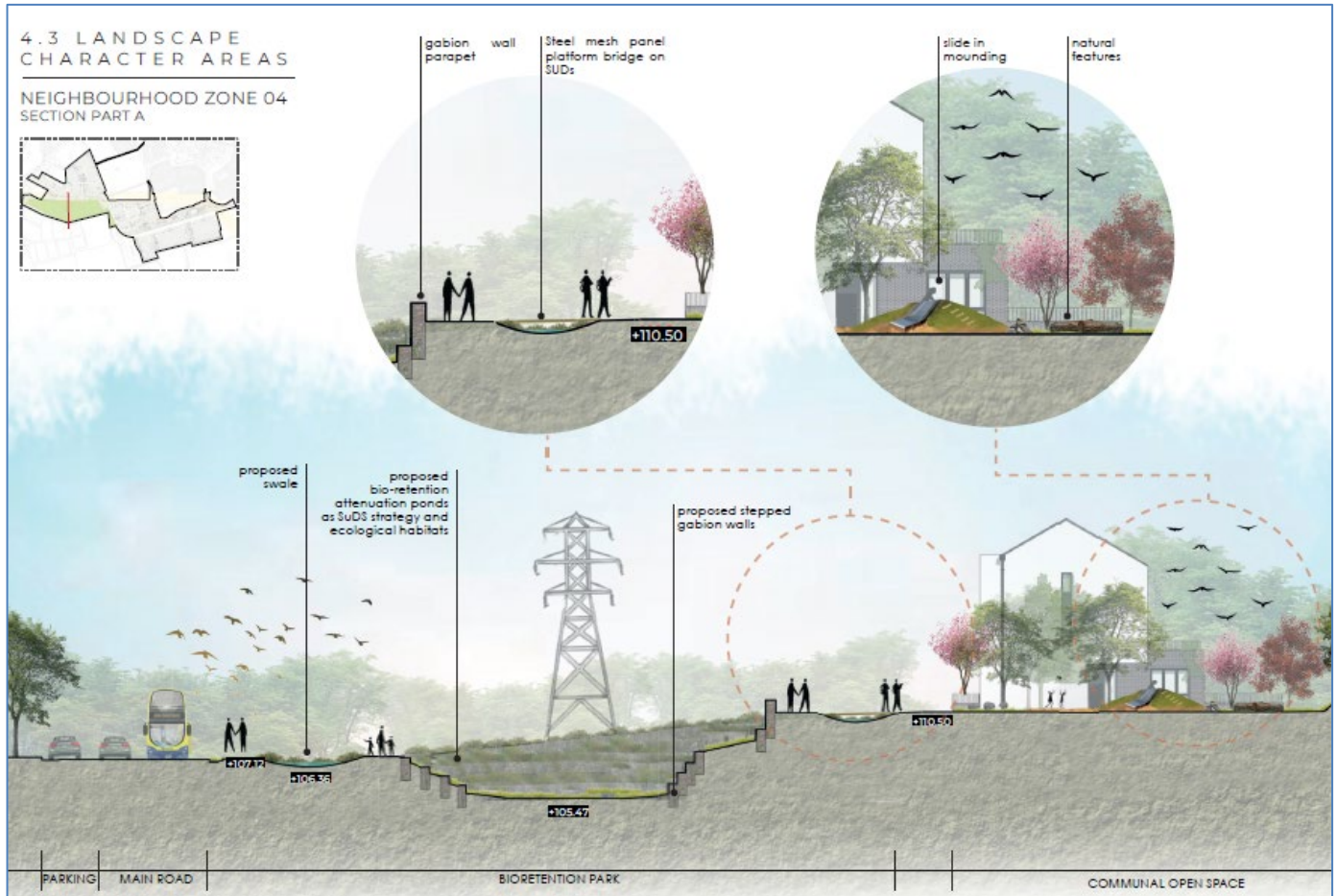


Fig. 24 – Section of part of the proposed open space for Neighbourhood Zone 4



Fig. 25 – Samples of hard and soft landscaping proposed for Neighbourhood Zone 4



Fig. 26 – Snapshot of part of the proposed open space for Neighbourhood Zone 4

7.4.5 Design Conclusion

In summary, the overall design concept applied to the proposed development has sought to create a new residential environment on the edge of the built-up area that takes into consideration the semi-rural landscape character of the area. Judicious consideration has been paid to the integration of existing landscaping features into the proposed design, whereby the buildings have been designed to carefully tie in with the streetscape and existing natural context.

The proposed development has been designed around a series of constraints including sloped terrain on parts of the site, an Irish Water wayleave, an existing and potential future pylon corridor path, as well as established existing green infrastructure. Within these constraints, the proposed development has been carefully configured to provide a high quality residential layout that incorporates and enhances the conditions of the site and its surroundings. Variety and distinctiveness are created through the four distinct neighbourhood zones.

All public paths, parks and connections within the development benefit from direct passive surveillance and have clear visibility with way-finding and orientation provided by the variety of building types and facade treatments. The interconnected nature of the public pedestrian and bicycle routes prioritise such accessibility throughout the entire development and onto adjoining lands / development.

The design approach has been driven by the intention to deliver a residential scheme that integrates with the varied topography of the land and connect with the existing residential context of adjoining neighbourhoods. The retention and enhancement of existing biodiversity features of the site including dry ditches, streams and important hedgerows add to the landscape design and help establish a clear sense of place for the proposed new neighbourhood.

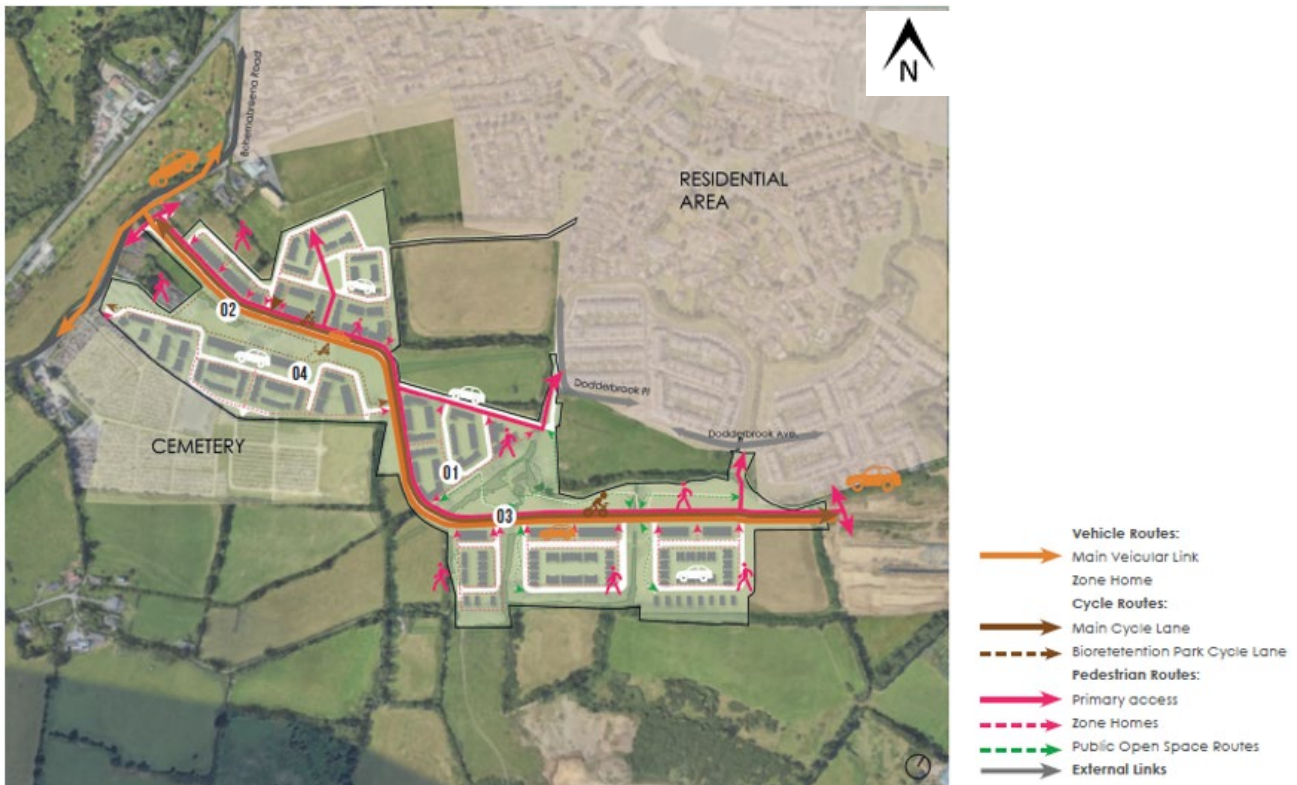
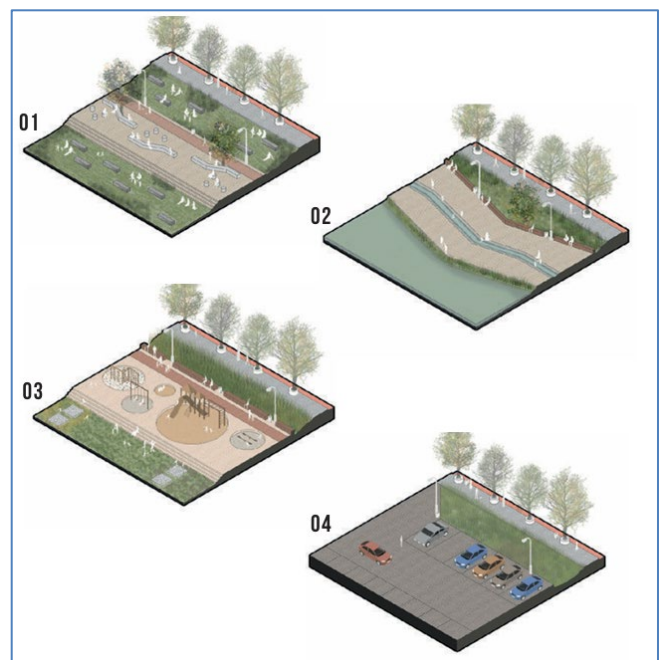


Fig. 27 – Proposed access and circulation

Each neighbourhood within the development has been designed on the principal of prioritising pedestrian movement and permeability. The sloped terrain on part of the site [Neighbourhood Zone 1 in particular] has been carefully considered so that streets can be designed with accessible movement in mind. The introduction of a bespoke split level house typology allows a lesser gradient on streets that connect the highest parts of the site back to the main link street.

In order to create an attractive and varied built environment, along with catering for a wide range of households, the proposed development features a range of housing typologies, including apartments, duplexes, and houses, comprised of a variety of the traditional scale of house, wide front houses and split level houses to not only respect the topography and character of the site but also to meet the varied needs and preferences of future residents.

Each of the four neighbourhood zones have been designed to have their own identity and will be visually different to neighbouring zones in a number of aspects. Building typology, materials and finishes, individual unit design and proportion and open space design are all used to develop an individual sense of place for each neighbourhood zone.



The overall proposal has gone through a careful design process in order to integrate into the natural confines of the site. It is put forward that the proposed development represents a considered and thoughtful response to the natural elements of the site while at the same time ensuring connections from and through the site allow for an integration of the scheme into the wider area. This thoughtful design response will ensure a high quality of life for future residents and only serve to add to a thriving residential community in this part of South County Dublin.

A unique feature of the proposed development is the landscape design approach applied. Within the proposed landscape design, pocket parks have been strategically incorporated into the layout, including areas for play, fitness, seating, and amphitheatre-style gatherings. The site layout plan clearly demonstrates that a genuine commitment has been made to preserving existing vegetation and creating spaces that promote and support local fauna. The landscape architects, Gannon & Associates, have also thoughtfully selected and integrated native plant species, providing essential food and shelter for wildlife.

One of the most significant design features of the proposed development is the delivery of "Oldcourt Park", as required by the LAP. This will be a substantial park of c. 2.35Ha in area that will serve future residents of the proposed development and the wider local community. The landscape design includes playground equipment in the main park, which includes areas for toddlers, wheelchair users and teenagers. The playground equipment is integrated with the topography and SUDS, using public space to create opportunities for natural play with large wooden logs, stones, and similar elements.

The landscape design encompasses a diverse range of dedicated areas for various activities, creating a comprehensive array of options across its expanse. Activities range from fitness zones and playgrounds to running tracks, catering to a wide range of preferences. Thoughtfully designed, serene and contemplative spaces offer moments of rest and relaxation, while designated areas for the appreciation of natural sounds enhance the sensory experience of the environment. The organic distribution of pocket parks, seamlessly integrates into the fabric of the site, imparts distinctive uniqueness to each space. Each pocket park has its individual identity, contributing to the formation of a harmonious tapestry where activities unfold in a fluid and integrated manner. This meticulous design approach reflects a commitment to providing an inclusive and integrated space where the community can engage in a variety of outdoor activities.

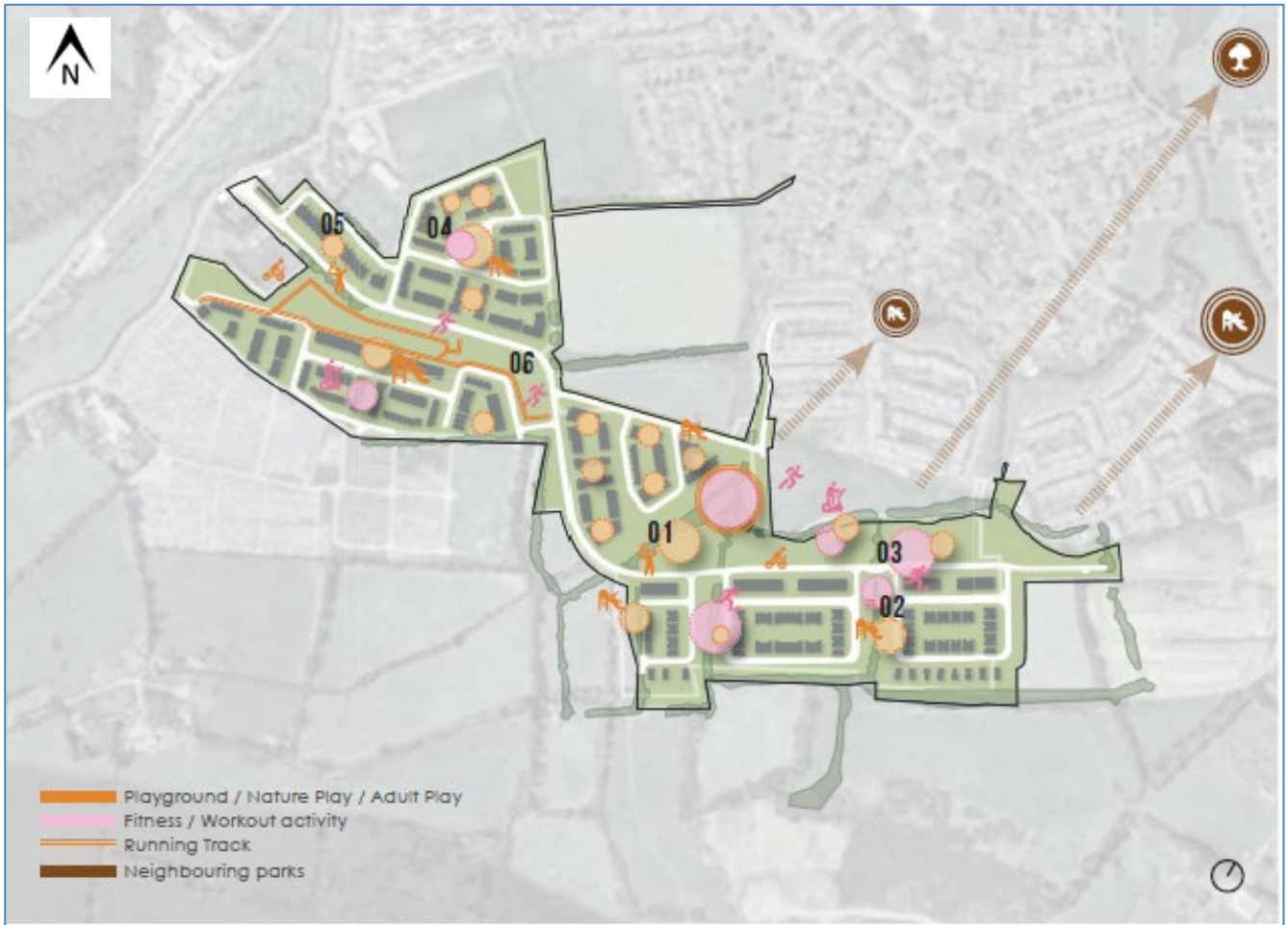


Fig. 28 – Proposed recreational features

Hedgerows are to be retained to the greatest extent possible, with removal considered only when necessary for the implementation of key infrastructure such as the main link street. The integration and preservation of hedgerows ensures the protection and enhancement of townland boundaries with special attention paid to those forming historical and cultural boundaries.

The proposed development will open up a currently inaccessible, zoned, site for an efficient and sustainable land use. As detailed in section 5 of this Statement, permission was previously granted for the construction of the main link street to serve the LAP lands, under SDCC Ref. SD17A/0041 (An Bord Pleanála Ref. PL06S.249367). Works under that permission never commenced; however, the access from Oldcourt Road (the R113) and initial route of the main link street was constructed by the applicant under a subsequent permission for residential development (SDCC Ref. SD17A/0468 – Ballycullen Gate). The proposed development seeks permission to construct the remainder of the main link street for the Ballycullen-Oldcourt LAP lands in a coherent manner, integrating with that already permitted / constructed to the east and continuing the route as far as Bohernabreena Road to the west. In total, the development caters for 4 no. vehicular access points: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development.

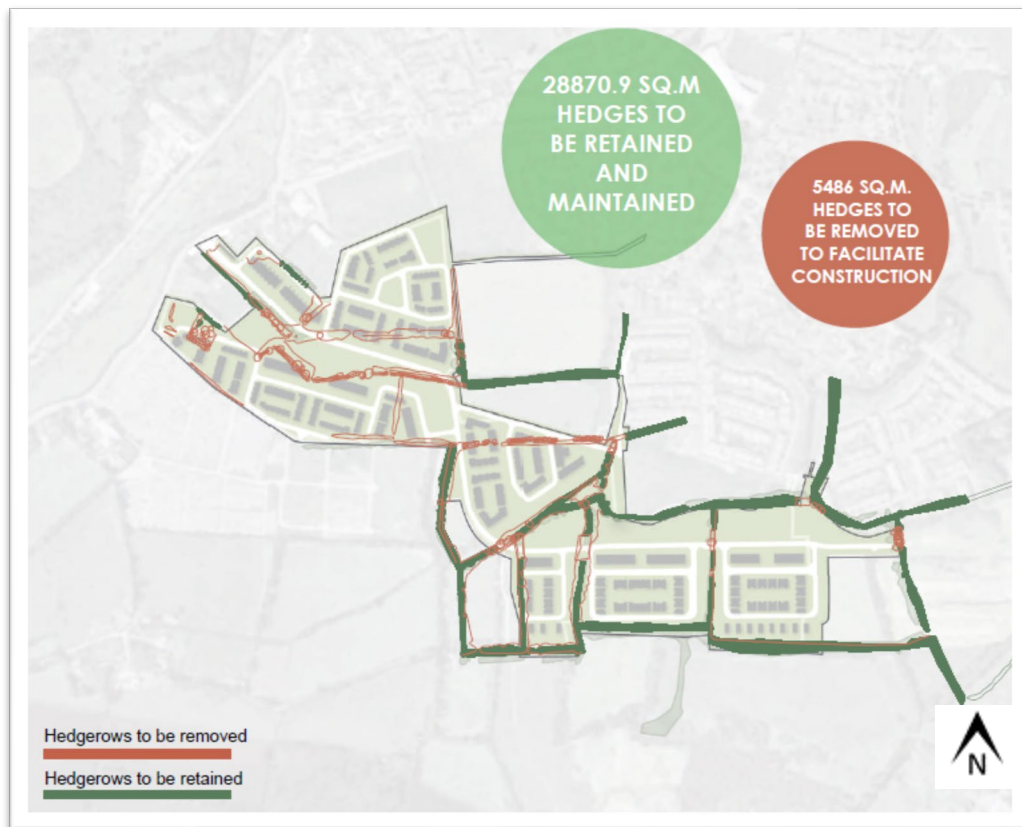


Fig. 29 – Tree & Hedgerow Protection

The usability of the development for pedestrian / cyclists has also been a key consideration in the design of the proposed layout. Along the entire route of the main link street, a segregated pedestrian path and cycle track is catered for, ensuring pedestrians / cyclists are given priority within the development. In addition, the development also includes for pedestrian and cyclist connections and accesses to adjoining lands to the north, east and west, and includes for cycling / pedestrian routes and infrastructure throughout the development on local streets and through areas of public open space, with an ample provision of bicycle parking proposed.

The subject site represents a strategic landbank of residentially zoned land, identified in the existing South Dublin CDP core strategy as being part of a 'Housing Capacity Site'. The site has been zoned for residential use for approximately 20 years and it remains the intention of the applicant, as a long-established housebuilder in the area, to develop these lands for housing. To date, the applicant has delivered over 340 no. dwellings, open spaces, playing pitch etc. in the immediate environs of the subject site, with a further 163 no. dwellings permitted, and/or currently under construction. It is fully considered the proposed development represents the appropriate scale and form of development for the subject site and based on the applicant's history of development in the area, the Planning Authority can be assured the proposed development will be delivered and completed in its entirety to the highest standard.

The remainder of this Planning Statement provides for details of the proposed development and should be read in conjunction with all accompanying documentation, drawings and details prepared by the various disciplines of the applicant's design team. A fully detailed list of enclosures can be found in the accompanying cover letter prepared by Armstrong Fenton Associates – please refer to same.



7.5 Overhead ESB Wires

As can be identified on the submitted site layout plans, there is a wayleave traversing the subject site accommodating existing overhead 220kV ESB wires and associated pylons.

The Ballycullen – Oldcourt LAP takes into account the presence of the overhead wires and presents two development options, which differ in terms of the treatment of the existing overhead wires that traverse the western side of the Plan Lands.

The LAP asserts that *“Option A involves redirecting a 500 metre (approximate) section of the overhead lines further to the south into the path of an existing wayleave of underground watermains. This is the preferred development option given that it would free up the less elevated and more level areas of the Plan Lands for development and allow for a more coherent arrangement of streets and blocks while grouping wayleave requirements for utilities into one channel. Option B represents an arrangement of streets and blocks around the current route of the overhead transmission lines and is the less preferred development option”*.

To date, the overhead lines remain in situ, however, any proposal to relocate them will be subject to permission via the Strategic Infrastructure Development (SID) planning process. The applicant has engaged with ESB and the “plan/strategy” for same at present is as follows:

- i. Options for re-routing the overhead wires southwards have been put forward by the applicant for agreement in principle with ESB,
- ii. Upon agreement of the preferred route, the SID planning application process will commence,
- iii. Upon planning consent being approved for the re-routing of the wires, the planning application process can commence for the remainder of the applicant's lands (outlined in blue on enclosed drawings).

The proposed site layout plan now put forward for permission takes into account the retention of the existing overhead ESB wires, with the adjoining land parcels in the applicant's control (as outlined in blue) that are currently affected by the overhead wires, being subject to future planning applications(s), and not forming part of this LRD application. To this end, we submit three no. drawings, prepared by Davey + Smith Architects, as follows:

- Drawing no. **MP15** which illustrates the proposed LRD now put forward for permission, and showing the existing wayleave accommodating the overhead wires, and illustrating how the wires can be relocated southwards through the applicant's adjoining lands, as outlined in blue, in a new wayleave.
- Drawing no. **MP16** which illustrates the proposed LRD as per the existing overhead wires, and illustrating an indicative housing layout on our client's adjoining, undeveloped lands, as outlined in blue, should the lines remain in their existing location, as per the existing wayleave.
- Drawing no. **MP17** which illustrates the proposed LRD, alongside potential future development on the applicant's adjoining lands (as outlined in blue) should the overhead wires be relocated southwards.

The above mentioned enclosed drawings are for information purposes only and demonstrate how the remainder of the western Plan lands, as per the Ballycullen – Oldcourt LAP, may be developed in the future, in either scenario of the overhead wires remaining in situ or being relocated. This will be dependent on the outcome of the future SID process to relocate same. It is therefore evident that in either scenario, the applicant's remaining lands (as outlined in



blue) can be developed in a coherent manner that will successfully integrate with permitted and proposed adjoining residential developments, and the furthermore, the proposed LRD does not impact on the future relocation of the overhead wires.

7.6 Playing Pitches

To the north-west of the application site, is St. Anne's GAA club. The applicant is in control of part of the GAA club grounds and has included same within the red line of the subject planning application. This land parcel forms part of the proposed Neighbourhood Zone 3 and is zoned for residential land use under the current CDP. At present, the subject land parcel acts as a training pitch and is not a full-sized GAA playing pitch.

To the east of the application site, our client has developed a new, full size GAA playing pitch, to current standards, located between Oldcourt Lane and Gunny Hill, under Ref. SD16A/0059 and An Bord Pleanála Ref. PL06S.247693. This new pitch is to be transferred to St. Anne's GAA club for their use by the applicant, thus replacing and improving on their existing training pitch.

Please note the following: the applicant for this LRD planning application is Capami Ltd. Capami Ltd., along with Raven Dawn Ltd. and Oldcourt Investments Ltd, are all subsidiary companies of Oceanfield, their parent company.

We enclose a letter from the solicitors of St. Anne's GAA club, Brady McGreevy Solicitors, dated 10th August 2024, confirming that Raven Dawn Ltd has agreed to purchase 3.5 acres of land from St. Anne's GAA Club. As part of this transaction, new lands are to be transferred to St. Anne's GAA Club i.e. the existing playing pitch already delivered by the applicant, located between Oldcourt Lane and Gunny Hill, on lands subject to folio. DN212393F.

St. Anne's GAA club are satisfied that the new playing pitch located between Oldcourt Lane and Gunny Hill satisfies the current and future needs to facilitate their members and teams. St. Anne's GAA Club confirm that the sale of their land will provide them with sufficient funds for the future development of the club. They also confirm that the acquisition of the new pitch between Oldcourt Lane and Gunny Hill does not result in any reduction to the grounds available to St. Anne's GAA Club and are fully supportive of the proposed LRD.

On behalf of St. Anne's GAA Club, Brady McGreevy Solicitors also confirm that the new pitch to be transferred to St. Anne's GAA Club, located between Oldcourt Lane and Gunny Hill, will also be made available for use by local schools in the area during school terms and school hours, and not limited to just playing Gaelic Games, upon the necessary agreements being put in place, thus satisfying Condition no. 6 attached to the order to grant permission for the pitch under Ref.s SD16A/0059 and PL.06S.247693.

By selling the subject site to the applicant will enable the GAA club to gather the necessary funds required to operate their club for the local community, whilst also receiving a brand new playing pitch to the east between Oldcourt Lane and Gunny Hill.

It is therefore put forward that while the subject site is proposed to be developed for housing, there will be no decrease or impact on community gain as the GAA club is being provided with a new purpose built pitch to serve their club. This pitch may also be used by other community groups such as schools for various sports.

The proposed development and provision of the new pitch between Oldcourt Lane and Gunny Hill by the applicant ought not be seen as a reduction in size of St Anne's GAA club pitches, but an improvement on their existing facilities.

Notwithstanding the foregoing, consideration should also be paid to the fact that this proposed LRD includes the delivery of Oldcourt Park, a significant park of c.2.3Ha (c.5.8 acres) that will also be a community gain.

The phasing requirement to provide and complete a playing pitch at Gunny Hill has been satisfied by the applicant. The existing training pitch at St. Anne's, that is now proposed to be developed as housing in Neighbourhood Zone 3 accords with its land use zoning objective (part RES and part RES-N) and also adheres to the framework for development set out in the LAP, as indicated on Fig. 30 below and as indicatively outlined in red. The adjoining lands to the immediate east of the application site are in use by St. Anne's GAA club, are not in the applicant's control and there is no proposal to alter the use of these lands as playing pitches.



Fig. 30 – Proposed housing framework for St. Annes lands as per Ballycullen – Oldcourt LAP (Fig. 5.6 of same).

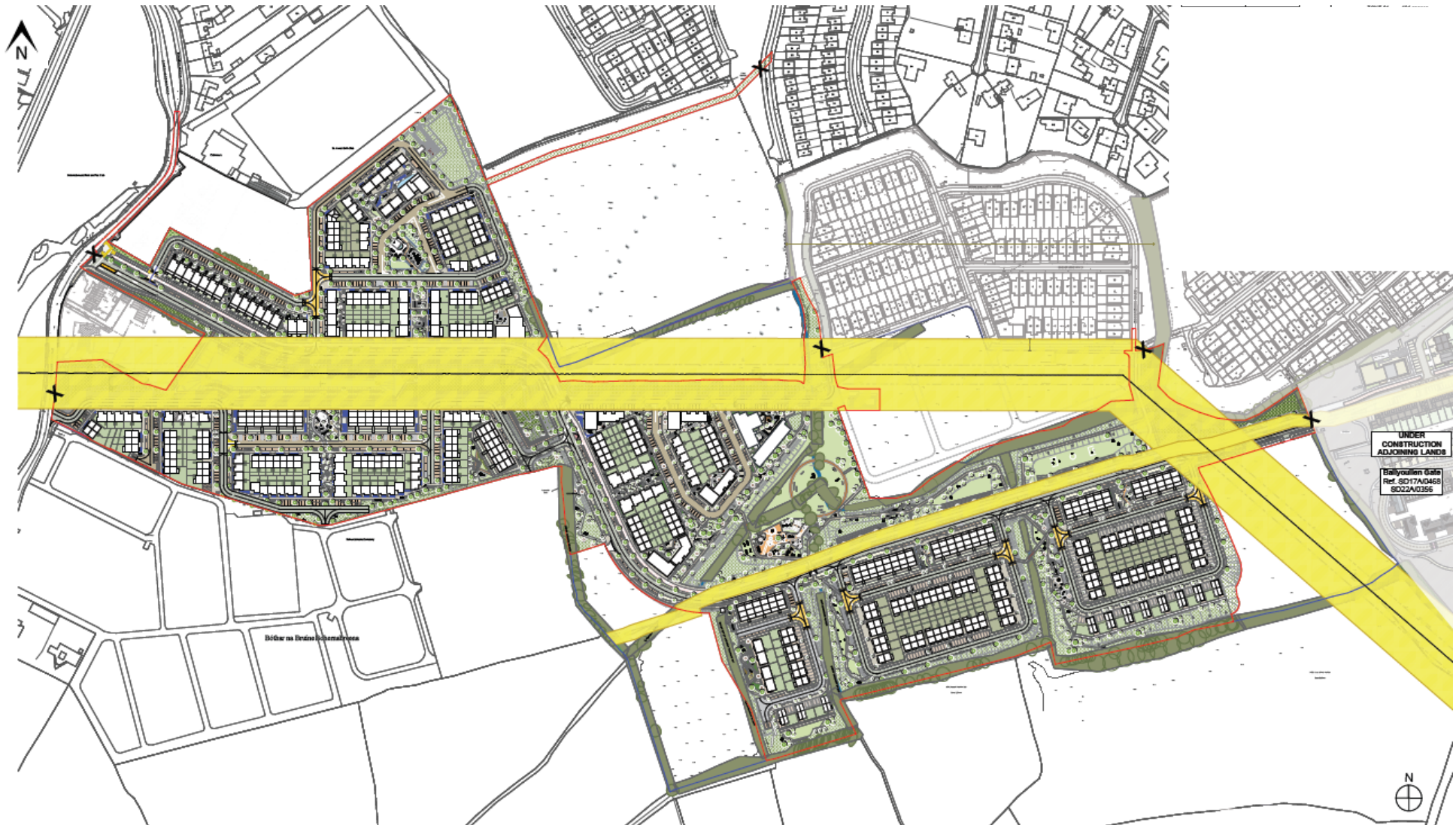


Fig. 31 - Proposed Site Layout.

7.7. Proposed Residential Development

7.7.1 Quantum of Units

The residential element of the proposed development consists of 523 no. dwellings; comprised of 255 no. 2, 3 and 4 bed, two and three storey, detached, semi-detached and terraced houses, and 268 no. apartments and duplex units.

The proposed 268 no. apartments and duplex units are provided as follows:

- 64 no. 1, 2 & 3 bed Urban Duplexes – “E1, E2, E3 & E4 types” in 9 no. 3 storey buildings,
- 142 no. 2 & 3 bed apartments/duplex units in Duplex Blocks A, B, C, D and E1, E2 & E3 in 11 no. 3 storey buildings,
- 62 no. 1, 2 & 3 bed apartments in Blocks A, B1, B2, C and D in 7 no. 3 and 3-4 storey buildings.

Unit Type	No. of Units	% Mix
Houses	255	49
Urban Duplexes	64	12
Duplexes	142	27
Apartments	62	12
Total	523	100%

Table 3 – Summary of Proposed Dwelling Types

In total, the proposed development caters for 27 no. apartment / duplex buildings, all of which are 3 storeys in height with the exception of Apartment Block C which is a 3-4 storey building.

Note: we are counting the proposed apartment Blocks C and B1 as 2 no. buildings. To this end, we refer the Planning Authority to the submitted site layout plans and individual house type / block type drawings prepared by Davey + Smith Architects for further and full details.

7.7.2 Dwelling Mix

A simplified summary of the proposed dwelling mix is set out in Table 4 overleaf.

In understanding the details set out Table 4 overleaf, the following should be noted:

- **Unit Mix (Apartments)** – relates to Apartment Blocks A, B1, B2, C located in Neighbourhood Zone 1 and Block D located in Neighbourhood Zone 3.
- **Unit Mix (Duplexes)** – relates to Duplex Blocks A (3 no.) and B (2 no.) located in Neighbourhood Zone 1, Duplex Blocks E1, E2 and E3 located in Neighbourhood Zone 3, and Duplex Block C and Duplex Block D (2 no.) in Neighbourhood Zone 4.
- **Unit Mix (Urban Duplexes – “E types”)** - relates to Duplex Blocks/Types E1, E2, E3 & E4 located in Neighbourhood Zones 2, 3 & 4.



Proposed Development		
Dwelling Type	No. of Units	% Mix
Apartments	62	12%
Duplexes	142	27%
Urban Duplex	64	12%
Houses	255	49%
Total No. Units	523	100%
Unit Mix (Apartments)	No. of Units	% Mix
1 Bed (2 persons)	24	38.71%
2 Bed (3 person)	6	9.68%
2 Bed (4 Person)	25	40%
3 Bed (5 person)	7	11.29%
Total No. Apartments	62	100%
Unit Mix (Duplexes)	No. of Units	% Mix
1 bed (2 person)	0	0%
2 Bed (3 person)	0	0%
2 Bed (4 Person)	71	50%
3 Bed (5 person)	71	50%
Total Duplexes	142	100%
Unit Mix (Urban Duplexes - "E1-E4 types")	No. of Units	% Mix
1 bed (2 person)	27	42.19%
2 Bed (3 person)	5	7.81%
3 Bed (5 person)	32	50%
Total Duplexes	64	100%
Unit Mix (Houses)	No. of Units	% Mix
2 bed (4 person)	61	23.92%
3 Bed (5 person)	159	62.35%
3 Bed (6 person)	1	0.39%
4 bed (7 person)	23	9.02%
4 bed (8 person)	11	4.31%
Total Houses	255	100%
Unit Mix (Total)	No. of Units	% Mix
1 bed	51	10%
2 bed	168	32%
3 bed	270	52%
4 bed	34	6%
Total Units	523	100%

Table 4 – Proposed Dwelling Mix



Houses

House Type	Description	No. of Bedrooms	No. Persons	No. of Units	Floor Area (m ²)	Total Floor Area (m ²)
A	4 Bed Detached	4	8	9	159.5	1,435.50
A1	4 Bed Detached	4	8	2	160.86	321.72
B1	4 Bed Detached	4	7	5	149.1	745.5
B2	4 Bed Semi-Detached	4	7	13	146.3	1,901.90
B3	4 Bed Semi-Detached	4	7	5	149.1	745.5
C1	3 Bed End Terrace	3	5	52	116.42	6,053.84
C2	3 Bed Mid Terrace	3	5	70	110.3	7,721
C3	3 Bed Semi-Detached	3	5	31	110.3	3,419.30
D1	2 Bed End Terraced	2	4	9	89.25	803.25
D2	2 Bed End Terraced	2	4	11	89.5	984.5
D3	2 Bed Mid Terrace	2	4	33	87.7	2,894.10
D4	2 Bed End Terraced	2	4	5	87.7	438.5
D5	2 Bed End Terraced	2	4	3	87.7	263.1
E5	3 Bed End Terraced	3	5	2	112.78	225.56
F1	3 Bed End Terraced	3	6	1	119.57	119.57
G1	3 Bed Semi - Detached	3	5	2	127.6	255.2
G	3 Bed Semi - Detached	3	5	2	127.6	255.2
Total				255		28,583.24m²

Table 5 – Proposed House Types

Table 6 – Proposed Mix of House Types

House Type	2 bed	3 bed	4 bed	Total
No. of Units	61	160	34	255
% Mix	24%	63%	13%	100%

**Duplexes****Duplex Block A (3 no. blocks):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment (End)	78.4	3	235.2
2 bed / 4 person apartment (Mid)	78.5	6	471
2 bed / 4 person apartment (Mid)	77.3	3	231.9
2 bed / 4 person apartment (Mid)	78.4	3	235.2
2 bed / 4 person apartment (End)	76.8	3	230.4
3 bed / 5 person duplex (End)	115	3	345
3 bed / 5 person duplex (Mid)	113.9	12	1366.8
3 bed / 5 person duplex (End)	111.8	3	335.4
Total		36	3,450.9

Table 7 – Proposed Duplex Types in Duplex Block A**Duplex Block B (2 no. blocks):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment (End)	78.4	4	313.6
2 bed / 4 person apartment (Mid)	78.5	6	471
2 bed / 4 person apartment (Mid)	77.3	4	309.2
2 bed / 4 person apartment (End)	76.8	2	153.6
3 bed / 5 person duplex (End)	115	2	230
3 bed / 5 person duplex (Mid)	113.9	8	911.2
3 bed / 5 person duplex (Mid/End)	111.8	6	670.8
Total		32	3,059.4

Table 8 – Proposed Duplex Types in Duplex Block B**Duplex Block C (1 no. block):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment (End)	78.4	1	78.4
2 bed / 4 person apartment (Mid)	76.2	4	304.8
2 bed / 4 person apartment (End)	76.8	1	76.8
3 bed / 5 person duplex (End)	114.1	1	114.1
3 bed / 5 person duplex (Mid/End)	110.9	5	554.5
Total		12	1,128.6

Table 9 – Proposed Duplex Types in Duplex Block C

**Duplex Block D (2 no. blocks):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment (End)	78.4	2	156.8
2 bed / 4 person apartment (Mid)	76.2	12	914.4
2 bed / 4 person apartment (End)	76.8	2	153.6
3 bed / 5 person duplex (End)	114.1	2	228.2
3 bed / 5 person duplex (Mid/End)	110.9	14	1552.6
Total		32	3,005.6

Table 10 – Proposed Duplex Types in Duplex Block D**Duplex Block E1 (1 no. block):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment (End)	83.5	1	83.5
2 bed / 4 person apartment ((Mid/End)	78.2	6	469.2
3 bed / 5 person duplex (End)	143.6	1	143.6
3 bed / 5 person duplex (Mid/End)	133	6	798
Total		14	1,494.3

Table 11 – Proposed Duplex Types in Duplex Block E1**Duplex Block E2 (1 no. block):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment (End)	83.5	1	83.5
2 bed / 4 person apartment ((Mid/End)	78.2	5	391
3 bed / 5 person duplex (End)	143.6	1	143.6
3 bed / 5 person duplex (Mid/End)	133	5	665
Total		12	1,283.1

Table 12 – Proposed Duplex Types in Duplex Block E2**Duplex Block E3 (1 no. block):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment	78.2	2	156.4
3 bed / 5 person duplex	133	2	266
Total		4	422.4

Table 13 – Proposed Duplex Types in Duplex Block E3

**Total Duplexes:**

Duplex Type	2 bed	3 bed	Total
No. of Units	71	71	142
% Mix	50%	50%	100%

Duplex Block	No. of Units	Total Floor Area (m ²)
A	36	3450.9
B	32	3059.4
C	12	1128.6
D	32	3005.6
E1	14	1494.3
E2	12	1283.1
E3	4	422.4
Total	142	13,844.3m²

Table 14 – Overall Proposed Duplexes**Urban Duplexes**

In addition to the proposed houses and duplex blocks, the proposed development also caters for an "E" type "Urban Duplex" unit. This unit is designed in the style of a three storey house; however, the unit is comprised of a ground floor, one or two bed apartment, and a first & second floor, three bed, duplex unit. There are 4 no. E type "Urban Duplex" i.e. types E1, E2, E3 & E4 with the proposed development including for 34 no. of the "E" type "Urban Duplex" units (in 8 no. blocks) containing 64 no. dwellings.

Urban Duplex Type E1:

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 bed / 2 person apartment	50.72	5	253.6
3 bed / 5 person duplex	103.97	5	519.85
Total		10	773.45

Table 15 – Proposed Urban Duplex E1 Types**Urban Duplex Type E2:**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 bed / 2 person apartment	50.72	18	912.96
3 bed / 5 person duplex	103.97	18	1871.46
Total		36	2784.42

Table 16 – Proposed Urban Duplex E2 Types

**Urban Duplex Type E3:**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 bed / 2 person apartment	50.72	4	202.88
3 bed / 5 person duplex	103.97	4	415.88
Total		8	618.76

Table 17 – Proposed Urban Duplex E3 Types**Urban Duplex Type E4:**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
2 bed / 4 person apartment	75.92	5	379.6
3 bed / 5 person duplex	103.97	5	519.85
Total		10	899.45

Table 18 – Proposed Urban Duplex E4 Types**Total Urban Duplexes:**

Urban Duplex Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	27	5	32	64
% Mix	42%	8%	50%	100%

Urban Duplex Unit Type	No. of Units	Total Floor Area (m ²)
E1	10	773.45
E2	36	2784.42
E3	8	618.76
E4	10	899.45
Total	64	5,076.08 m²

Table 19 – Overall Proposed Urban Duplexes

**Apartments:****Apartment Block A:**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 Bed / 2 Person (Apartment)	57.22	2	114.44
1 Bed / 2 Person (Apartment)	57.79	1	57.79
1 Bed / 2 Person (Apartment)	52.71	1	52.71
2 Bed / 3 Person (Apartment)	67.09	1	67.09
2 Bed / 3 Person (Apartment)	65.85	1	65.85
2 Bed / 4 Person (Apartment)	87.7	2	175.4
3 bed / 5 Person (Duplex)	103.36	1	103.36
Total		9	636.64

Table 20 – Proposed Unit Types in Block A**Apartment Block B1 (2 no. blocks):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 Bed / 2 Person (Apartment)	52.61	4	210.44
2 Bed / 4 Person (Apartment)	85.12	6	510.72
3 bed / 5 Person (Duplex)	103.86	2	207.72
3 bed / 5 Person (Duplex)	111.28	2	222.56
Total		14	1,151.44

Table 21 – Proposed Unit Types in Block B1**Apartment Block B2:**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 Bed / 2 Person (Apartment)	52.61	2	105.22
1 Bed / 2 Person (Duplex)	60.71	1	60.71
2 Bed / 4 Person (Duplex)	85.12	2	170.24
3 bed / 5 Person (Duplex)	103.86	1	103.86
3 bed / 5 Person (Duplex)	111.28	1	111.28
Total		7	551.31

Table 22 – Proposed Unit Types in Block B2

**Apartment Block C (2 no. blocks):**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 Bed / 2 Person (Apartment)	54.35	2	108.7
1 Bed / 2 Person (Apartment)	55.2	1	55.2
1 Bed / 2 Person (Apartment)	55.75	1	55.75
1 Bed / 2 Person (Apartment)	49.53	4	198.12
1 Bed / 2 Person (Apartment)	49.5	1	49.5
2 Bed / 3 Person (Apartment)	68.98	1	68.98
2 Bed / 3 Person (Apartment)	69.78	2	139.56
2 Bed / 4 Person (Apartment)	79.86	3	239.58
2 Bed / 4 Person (Apartment)	82.88	3	248.64
2 Bed / 4 Person (Apartment)	75.6	1	75.6
2 Bed / 4 Person (Apartment)	84.81	1	84.81
2 Bed / 4 Person (Apartment)	75.59	1	75.59
2 Bed / 4 Person (Apartment)	84.78	2	169.56
Total		23	1,569.59

Table 23 – Proposed Unit Types in Block B2**Apartment Block D:**

Unit Type	Floor Area (m ²)	No. of Units	Total Floor Area (m ²)
1 Bed / 2 Person (Apartment)	56.48	2	112.96
1 Bed / 2 Person (Apartment)	55.62	2	111.24
2 Bed / 3 Person (Apartment)	63.63	1	63.63
2 Bed / 4 Person (Apartment)	88.11	2	176.22
2 Bed / 4 Person (Apartment)	78.03	2	156.06
Total		9	620.11

Table 24 – Proposed Unit Types in Block D

Total Apartments:

Apartment Block	No. of Units	Total Floor Area (m ²)
A	9	636.64
B1	7	575.72
B1	7	575.72
B2	7	551.31
C	23	1569.59
D	9	620.11
Total	62	4,529.09 m²

Apartment Type	1 bed	2 bed	3 bed	Total
No. of Units	24	31	7	62
% Mix	39	50	11	100

Table 25 – Overall Proposed Apartments

Dwelling Type	1 bed	2 bed	3 bed	4 bed	Total	Percentage %
Houses	0	61	160	34	255	49%
Apartments	24	31	7	0	62	12%
Duplex	0	71	71	0	142	27%
Urban Duplex (E types)	27	5	32	0	64	12%
Total	51	168	270	34	523	100%
Percentage %	10%	32%	52%	6%	100%	-

Table 26 – Overall Dwelling Mix

As detailed above, the proposed development provides a dwelling split of 49% houses and 51% apartment and duplex units.

The proposed residential mix is put forward for permission having regard to the following factors:

- the need to address the sloping topography of the site,
- the site's relationship to adjoining lands, which are comprised of existing and permitted residential development and situated at the foothills of the Dublin mountains,
- the various requirements to provide for an appropriate level of dwelling typologies which cater for a variety of consumer needs / lifestyle choices.

The proposed housing mix also reflects the need to provide an efficient density of at least 40 units per hectare, as required by the Sustainable Residential Development and Compact Settlements Guidelines, 2024, which is reaffirmed by the detail set out in the Planning Authority's LRD opinion received for the subject proposal under Ref. LRDOP001/24.

It is considered that ample provision has been made for housing typologies which can cater for residents who are at different stages of their lifecycle i.e. those who may be looking to downsize or young workers and couples as first-time buyers. Furthermore, consideration has also been paid to the requirement of the Ballycullen-Oldcourt LAP that the housing mix across the entirety of the Plan lands *"should vary in a manner that responds appropriately to the varying contexts including existing suburban development, the differing topography and proximity to the rural and mountain edge"*.

We also note the need to comply with **H1 Objective 12** of the existing South Dublin CDP which states: *"Proposals for residential development shall provide a minimum of 30% 3-bedroom units....."*.

As detailed in Tables 4 and 26, above, the proposed development complies with the above objective by providing 270 no. 3 bedroom units which equates to 52% of the overall development proposal.

Section 12.6.1 'Mix of Dwelling Types' of the existing CDP also states: *"The overall mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. SPUR 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) states that residential development may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms"*.

As detailed in Tables 4 and 26, above, the proposed development includes 51 no. 1 bedroom units which equates to 10% of the overall unit provision thus complying with this requirement.

Policy QDP10 Objective 1 of the existing CDP also seeks to: *"Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028."*

Regarding the above, it is considered evident from the tables set out in this section of the Planning Statement that the proposed development provides for a wide variety of housing typologies, and a wide variety of unit sizes, with all proposed units being afforded an ample gross floor area which exceeds the minimum requirements, allowing for ease of internal adaption for future residents and, in the case of houses, the option to extend the dwelling if required. This is affirmed by the submitted plans and Housing Quality Assessment (hereafter "HQA") that accompanies this LRD application as a separate, standalone document – please refer to same for full details.

The development will also provide for the required number of social and affordable housing units as detailed in the preceding section 6 of this Planning Statement, (95 no. units total) thus ensuring a wide of variety tenures within the development.

The provision of one, two, three and four bed units also ensures the development can support a variety of persons at different stages of the lifecycle, including for; first time buyers, young families, established families, single workers, students and older persons who may be looking to downsize.

It is also considered the proposed development supports **Objective LUD4** of the Ballycullen-Oldcourt LAP which seeks to provide “A mix of house types and quality designs that will help aid legibility and way-finding is encouraged across the Plan Lands”.

It is noted that **Objective LUD3** of the LAP states “The permissible dwelling mix shall yield a minimum of 90% or more houses”. While the proposed development, in isolation, does not comply with this requirement, it is evident the proposed development fully complies with the more up-to-date objectives of the existing South Dublin CDP in relation to dwelling mix, as well as the objectives of the National Planning Framework, Eastern & Midland Regional Spatial and Economic Strategy and current section 28 Ministerial guidelines such as the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023) and the Sustainable Residential Development and Compact Settlements Guidelines, 2024, that seek to increase apartment development in appropriate locations and provide an efficient and sustainable density of development. As such, it is therefore fully considered the proposed dwelling mix is appropriate and can be granted permission.

In summary, the proposed residential mix is considered to support South Dublin County Council's Housing Strategy for new development which, in general, seeks to provide for an appropriate mix of dwelling types and sizes, that are capable of adaption as resident needs change over the course of their lifecycle, and tenures to facilitate the creation of balanced communities. As detailed in the submitted “Architectural Design Statement” prepared by Davey+Smith Architects, the proposed development has been designed to cater for four distinct Neighbourhood Zones to ensure an appropriate level of variety and a sense of place is catered for throughout - please refer to that same for further and full details. Furthermore, the submitted HQA demonstrates that all of the proposed dwellings meet or exceed the minimum standards for housing and apartments as required by the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023) and the Quality Housing for Sustainable Communities – Best Practice Guidelines, 2007.

7.8. Proposed Gross Floor Area

The proposed residential accommodation comprises a total of 52,032.71m² gross floor area. The proposed non-residential elements comprise a crèche of c.457m². The total gross floor area proposed is 52,489.71m².

- Residential floor space – 52,032.71m².
- Crèche - 457m².
- Total floor area – 52,489.71m².

Unit Type	No. of Units	Gross Floor Area (m ²)
Houses	255	28,583.24
Urban Duplex (types E1-E4)	64	5,076.08
Duplexes	142	1,3844.3
Apartments	62	4,529.09
Total	523	52,032.71

Table 27: Proposed Residential Floor Area

A full schedule of the proposed residential accommodation is set out in the enclosed Housing Quality Assessment (HQA) – please refer to same.

7.9 Plot Ratio

The proposed development has total floor area of 52,489.71m² (including the crèche) and based upon the gross site area of 203,701.8m², produces a plot ratio of 0.25. If the net developable area is considered only (124,920.5m²), the resultant plot ratio is 0.42.

7.10 Site Coverage

The proposed site coverage is c. 11.5%.

7.11 Apartment Standards

The proposed development caters for 523 no. residential dwellings, including for 268 no. apartments and duplex units. The proposed apartments and duplex units have been designed in accordance with the Specific Planning Policy Requirements (SPPRs) of the "Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023)" (hereafter "the Apartment Guidelines").

The Apartment Guidelines detail standards relating to the development of new apartment schemes, which are replicated in the existing South Dublin CDP. The Apartment Guidelines contain 7 no. SPPRs which Planning Authorities and An Bord Pleanála are required to apply in carrying out their functions. These SPPRs, and the proposed development's compliance with same, are addressed below. Please also refer to the submitted Statement of Consistency (section 5.2) which sets out how the proposed development complies with the requirements of the Apartment Guidelines.

SPPR 1 of the Apartment Guidelines states:

"Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s)."

The proposed development consists of 523 no. residential dwellings, comprised of 255 no. 2, 3 & 4 bed detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 3 & 3-4 storey blocks.

The proposed 268 no. apartment / duplex units are further broken down into:

- 51 no. one-bed units,
- 107 no. two-bed units and
- 110 no. three-bed units.

The number of proposed one-bed apartment / duplex units represents c.19% of the total apartment / duplex mix, and c. 10% of the overall proposed quantum of housing within the development. There are no studio units proposed. The proposed development is therefore compliant with SPPR 1 of the Apartment Guidelines

SPPR 2 of the Apartment Guidelines states:

"For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio type units;*
- Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- For schemes of 50 or more units, SPPR 1 shall apply to the entire development.*

All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development."

The proposed development does not cater for a building refurbishment scheme or urban infill scheme and therefore SPPR 2 of the Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 2 of the Apartment Guidelines. Notwithstanding same, as detailed above, the proposed development is compliant with SPPR 1 of the Apartment Guidelines and is therefore considered compliant with SPPR 2 of the Apartment Guidelines.

SPPR 3 of the Apartment Guidelines states the minimum floor areas for apartments, being:

- 37 sq.m for studios,
- 45 sq.m for 1 bed apartments,
- 63 sq.m for 2 bed / 3 person apartments,
- 73 sq.m for 2 bed / 4 person apartments,
- 90 sq.m for 3 bed apartments.

As detailed on the submitted floor plan drawings prepared by Davey + Smith Architects, all the proposed apartment / duplex units meet with and/or exceed the minimum apartment floor areas stated in SPPR 3 of the Apartment Guidelines. The proposed development is therefore compliant with SPPR 3 of the Apartment Guidelines.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines – please refer to same.

SPPR 4 of the Apartment Guidelines has regard to dual aspect units and states the following:

"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- i. A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.*
- ii. In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*

- iii. *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."*

In relation to the above, the subject site is considered a "suburban or intermediate location". SPPR 4 of the Apartment Guidelines states there shall generally be a minimum 50% dual aspect ratio at such locations. Table 28 below, sets out the quantum and percentage of single and dual aspect apartment / duplex units proposed within the development; however, we also refer the Planning Authority to the submitted block plans prepared by Davey + Smith Architects for further details.

Of the proposed 268 no. apartment / duplex units, only 3 no. units, all in Block C, (c. 1%) are single aspect, and these are identified in the submitted HQA – please refer to same. The remainder of the proposed apartments and duplex units are dual and triple aspect.

Block	Total No. of Units	No. of Single Aspect Units	No. of Dual Aspect Units	No. of Triple Aspect Units
Apartment A	9	0	4	5
Apartment B1	14	0	6	8
Apartment B2	7	0	3	4
Apartment C	23	3	11	9
Apartment D	9	0	9	0
Duplex Block A	36	0	36	0
Duplex Block B	32	0	32	0
Duplex Block C	12	0	12	0
Duplex Block D	32	0	32	0
Duplex Block E1	14	0	14	0
Duplex Block E2	12	0	12	0
Duplex Block E3	4	0	4	0
Urban Block E1	10	0	5	5
Urban Block E2	36	0	18	18
Urban Block E3	11	0	0	11
Urban Block E4	6	0	0	6
Total	268	3	198	67

Table 28: Apartment / Duplex Dual Aspect Ratio.

As detailed in Table 28 above, and on both the submitted HQA and block drawings prepared by Davey + Smith Architects which accompany this application, the proposed development is compliant with SPPR 4 of the Apartment Guidelines.

SPPR 5 of the Apartment Guidelines has regard to floor to ceiling heights and states the following:

"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality."

All the proposed ground level apartments achieve the minimum of 2.7m floor to ceiling height as required. Please refer to the submitted block plans prepared by Davey + Smith Architects for full details.

The proposed development is therefore compliant with SPPR 5 of the Apartment Guidelines.

SPPR 6 of the Apartment Guidelines has regard to the maximum number of apartments per floor per core and states the following:

"A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations."

All the proposed apartment / duplex blocks are designed to ensure the stated units per floor per core is not exceeded. The highest number of units (8 no.) accessed from a single core is in Block C. Please refer to the submitted block plans prepared by Davey + Smith Architects for full details. The proposed development is therefore compliant with SPPR 6 of the Apartment Guidelines.

SPPR 7 of the Apartment Guidelines has regard to shared accommodation/co-living developments:

"There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process".

The proposed development does not cater for any shared accommodation/co-living units and, therefore, SPPR 7 of the Apartment Guidelines does not apply. The proposed development is therefore compliant with SPPR 7 of the Apartment Guidelines.

The Apartment Guidelines provide for highest quality living standards for new apartment schemes in Ireland. The proposed development's compliance with all applicable SPPRs of the Apartment Guidelines has been outlined above and it is therefore considered the proposed apartments and duplex units within the proposed LRD are representative of a high-quality standard.

In addition to the above SPPRs, the Apartment Guidelines also detail several other considerations for new developments containing apartments. Most of these additional considerations are discussed in later sections of this Statement (i.e., car and bicycle parking, communal open space, children's play facilities etc.) and we respectfully refer the Planning Authority to same for further details. In addition, section 5.2 of the submitted Statement of Consistency provides full details of the proposed development's compliance with the Apartment Guidelines. Notwithstanding same, the following considerations of the Apartment Guidelines are noted:

- **Section 2.4** of the Apartment Guidelines identifies of the types of location that may be suitable for apartment development, with the guidelines outlining three types of locations as follows:

- Central and/or Accessible Urban Locations,
- Intermediate Urban Locations,
- Peripheral and/or Less Accessible Urban Locations,

The criteria for determining these locations and the scale of apartment development that is considered appropriate at each location is also provided.

In the above context the subject site is considered a "Peripheral and/or Less Accessible Urban Location" with the nearest existing bus stops being located approximately 1 km north of the eastern end of the site at Killinenny Road. This is notwithstanding that the fact the proposed design accommodates 2 no. future/potential bus stops along the proposed main link street running through the development. It should also be noted the Apartment Guidelines state the range of locations outlined in the guidelines is not exhaustive and will require local assessment by the Planning Authority. We also note in their LRD Opinion (Ref. LRDOP001/24) that the Planning Authority confirms that the subject site is not located in an "accessible" location.

Peripheral and/or Less Accessible Urban Locations are defined by the Apartment Guidelines as being *"generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including: Sites in suburban development areas that do not meet proximity or accessibility criteria"*.

The proposed development puts forward an overall gross density of c.26 units per hectare, however, by applying guidance for calculating density, e.g. excluding the east-west link street, areas that cannot be developed e.g. due to hedgerow protection, wayleaves etc., the net density of the proposed development is c.42 units per hectare, with proposed apartment / duplex units representing c.51% of the overall dwelling mix and, therefore, the proposed development is considered to comply with the above stated guidance of the Apartment Guidelines and is an appropriate location for apartment development.

- **Section 3.8** of the Apartment Guidelines requires the majority of all apartments in any scheme of 10 or more apartments exceed the stated minimum floor area standards by a minimum of 10%.

In compliance with the above requirement, the proposed apartments & duplex units should have a total minimum floor area of 19,896sq.m. An additional 10% of same would equate to 21,885.6sq.m. The 268 no. proposed apartment / duplex units, has a total floor area of 23,449.47sq.m thus exceeding the minimum floor area standard by more than 10%.

- **Section 3.30** of the Apartment Guidelines states all proposed units should provide for the general storage and utility in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:
 - Studio Unit – 3 sq.m
 - One bedroom unit – 3 sq.m
 - Two bedroom (three person unit) – 5 sq.m
 - Two bedroom (four person unit) – 6 sq.m
 - Three person unit – 9 sq.m

As detailed on the submitted floor plans prepared by Davey + Smith Architects, all proposed apartment / duplex units comply with this requirement for storage.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines.

- **Sections 3.35 – 3.36** of the Apartment Guidelines states all proposed units should be provided with private amenity space in the form of patios / terraces for ground floor units and balconies for upper floor units in line with the minimum requirements detailed in Appendix 1 of the Apartment Guidelines. These standards are as follows:
 - Studio Unit – 4 sq.m
 - One bedroom unit – 5 sq.m
 - Two bedroom (three person unit) – 6 sq.m
 - Two bedroom (four person unit) – 7 sq.m
 - Three person unit – 9 sq.m

As detailed on the submitted floor plans prepared by Davey + Smith Architects all proposed apartment / duplex units comply with this requirement for private amenity space.

This application is accompanied by a Housing Quality Assessment (HQA) as a separate standalone document which demonstrates each individual dwelling's compliance with relevant quantitative standards for new apartments detailed in the Apartment Guidelines.

- **Section 6** of the Apartment Guidelines has regard to "Apartments and the Development Management Process". Within same, the following are noted:
 - Section 6.1 states all applications for apartment schemes must submit a schedule detailing the number and type of apartments and associated individual unit floor areas.
 - Section 6.12 of the Apartment Guidelines states planning applications for apartment development shall include a building lifecycle report, including for an assessment of long term running and maintenance costs and measures specifically considered to effectively manage and reduce costs for the benefit of residents.

As required, a Building Life Cycle Report has been prepared by Armstrong Fenton Associates and is submitted as part of this LRD planning application as a separate, standalone report – please refer to same.

The number and type of apartments, and their associated individual unit floor areas are all detailed in the submitted HQA – please refer to same.

- **Appendix 1** of the Apartment Guidelines details the minimum room widths / areas / aggregate areas for individual kitchen/living/dining and bedrooms for apartments.

As detailed on the submitted floor plans prepared by Davey + Smith Architects, all proposed apartments and duplex units comply with the requirement, and as confirmed in the submitted HQA – please refer to same.

7.12 Building Heights

All proposed houses are two or three storeys in height.

All proposed duplex blocks, i.e. duplex blocks, A (x 3 no.), B (x 2 no.), C, D (x 2 no.) & E (i.e. E1, E2 & E3) are three storeys in height.

All proposed "E" type "Urban Duplex" blocks are 3 three storeys in height.

All the proposed apartment blocks, i.e. apartment blocks A, B1 (x 2 no.), B2 and D are three storeys in height.

Apartment block C (in 2 no. blocks) is 3-4 storeys.

Apartment Block	Storeys	Max Height (m)
A	2-3	9.6
B1	2-3	10.2
B2	2-3	10.2
C	3-4	10.25 - 11
D	2-3	10.8

Table 29 – Proposed Heights of Apartment Blocks

We enclose Davey+ Smith drawing no. MP-14 – "Overall Lands – Height Strategy" which illustrates how the taller buildings are distributed throughout the entire site, as requested in the Planning Authority's LRD Opinion. All other buildings on said map, that are not coloured represent the 2 and 3 storey houses.

It is considered that the proposed building heights are consistent with development in the area and respectful of the site's topography and location at the foothills of the Dublin Mountains.

We note **Objective BF8** of the Ballycullen-Oldcourt LAP which states: "Development shall be no more than one storey at street level on the Upper Slope Lands, no more than two storeys at street level on the Mid Slope Lands and no more than three storeys on the Lower Slope Lands. New dwellings backing onto or adjacent to existing single storey dwellings should be no more than two storeys".

The above building height parameters have been considered and incorporated into the proposed development to ensure views of the Dublin mountains and historic buildings and monuments in the area, are enhanced and preserved as much as possible, as per **Objective BF7** of the Ballycullen-Oldcourt LAP. Also, in accordance with same, this has been achieved through the sensitive arrangement of streets, spaces, and buildings within the proposed development.

In Neighbourhood Zone 1, where the southern part of that zone is located on one of the steepest parts of the site, a split level detached bungalow typology is proposed taking into account the topography and character of this part of the site. The split level house type along the southern boundary provides an opportunity to incorporate a strong design and placemaking solution to a stepped condition at the upper contour. No development encroaches onto the 120m contour in this Neighbourhood Zone.

As detailed in the submitted Architectural Design Statement prepared by Davey + Smith Architects, there is a strong design rationale for the provision of 3 storey buildings at certain locations within the proposed layout, in order to provide for a variety of dwelling designs, in accordance with **Objective BF9** of the Ballycullen-Oldcourt LAP, and an appropriate level of architectural variety and visual interest. The siting of proposed taller buildings within the development also considers the steep sloping nature of the site to ensure the layout can appropriately accommodate the height of these buildings, minimising visual and topographical impacts. Three storey buildings are carefully positioned fronting onto the proposed main link street that traverses the site in order to create a strong street frontage, and at corner locations to bookend housing cells and provide animation as one travels through the development.

7.13 Daylight / Sunlight Analysis

The proposed development has been assessed in terms of sunlight / daylight and shadow analysis, with the submitted assessment being prepared by CS Consulting. The submitted assessment stated that the proposed development (in terms of Development Performance) generally complies with the recommendations and guidelines of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (BR209 - 2022).

In terms of sunlight to rooms (living areas), 94% of all Living rooms (97% if we include marginals) receive 1.5hrs of sunlight on the test day of the 21st March.

87% of rooms are in the high-quality range. This is consistent with the BRE defined "careful layout design" 80% target.

75% (85% including marginal) of new provided communal and public amenity spaces pass the BRE requirement. There are compensatory factors relating to those that do not. The tested spaces generally comply with the requirements of the BRE guidelines

75% (85% including marginal) of new provided communal and public amenity spaces pass the BRE requirement.

Please refer to the enclosed "Sunlight, Daylight & Shadow Assessment" by CS Consulting for full details.

7.14 Proposed Non-Residential Elements

7.14.1 Creche

The proposed development includes for one non-residential use; being a proposed childcare facility which measures c. 457sq.m in a standalone 2 storey dedicated facility, located in Neighbourhood Zone 3.

Based on the proposed development of 523 no. residential dwellings and the requirements of the "Childcare Facilities Guidelines for Planning Authorities" (2001), which state provision should be made in new developments for 20 no. childcare places for every 75 no. dwellings, the proposed development would have a requirement to provide for a childcare facility catering for 139 no. childcare places. It is noted; however, that section 4.7 of the Apartment Guidelines states, in relation to childcare facilities: *"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms"*. The proposed development includes 51 no. one bed units.

Discounting the 51 no. proposed one bed units, the proposed development caters for 472 no. dwellings for the purposes of assessing the childcare requirements and based on the provision of 20 no. childcare places for every 75 no. dwellings, the development therefore has a requirement to provide for a childcare facility catering for 126 no. childcare places.

The proposed childcare facility has been designed to be of a size capable of catering for 126 no. childcare places. The 2001 Guidelines apply a minimum floor space per child of 2.32sq.m, exclusive of kitchen, bathroom and hall, furniture or permanent fixtures. Applying that standard, a childcare facility to serve the proposed development and meeting the requirement for c. 126 childcare spaces would need to be a minimum of c. 292sq.m net floor area.

The location of the childcare facility within the layout has sought to ensure the facility is centrally located within the scheme and easily accessible to all residents. An area of associated outdoor play space, to the rear of the facility has also been provided for, of c.63sq.m.

The proposed floor area of the crèche i.e. 457sq.m therefore exceeds the minimum requirement as set out in the 2001 Childcare Facilities – Guidelines for Planning Authorities by c.165sq.m, and includes sufficient additional floorspace to accommodate toilets, sleep room, reception, staff area, circulation and escape route spaces, furniture and permanent fixtures as required, and can adequately cater for the required 126 no. childcare spaces.

In consideration of the overall gross floor area of the proposed creche, along with the availability of existing childcare facilities in the environs (as identified in Section 4.2 of the submitted Social Infrastructure Assessment) and those recently permitted in the LAP area, it is put forward that the proposed creche is of an appropriate size and scale to cater for the proposed development.

We note that there are extant permissions for childcare facilities in Phases 1 and 2 of the adjoining residential development at Dodderbrook. As part of Phase 1 of Dodderbrook (Ref. SD14A/0180), permission was granted for a creche of c. 177sq.m at the corner of Dodderbrook Drive and Dodderbrook Terrace. Permission for Phase 2 of Dodderbrook (Ref.s SD17A/0121 & PL06S.249294) provides for a crèche facility of c.423 square metres which has the capacity to cater for 80 no. children, and which has been built.

Given all the foregoing, it is respectfully submitted the proposed development caters for the appropriate provision of childcare place and is compliant with the 2001 "Childcare Facilities Guidelines for Planning Authorities".

7.14.2 Community Facilities

We note there is a phasing requirement of the Ballycullen – Oldcourt LAP whereby the provision of a minimum of 300 sq.m of community floorspace is required as part of Phase 2 of the development of the western Plan lands. In complying same, the following should be noted:

The applicant and their representatives have held discussions with Eoin Burke of South Dublin County Council's Delivery Team (Architectural Conservation, Heritage and Land Use Plans) in order to agree a financial contribution in lieu of the provision of community floorspace within the proposed development. The outcome of these discussions has resulted in a financial contribution figure being agreed in principle between the applicant and South Dublin County Council (hereafter "SDCC") based on the estimated cost of constructing an extension to an existing community centre in the area, which is the preference of SDCC's Delivery Team. The estimated cost of constructing such an extension, as agreed with SDCC, is €900,000.00 (inclusive of VAT).

The applicant is satisfied to pay the above estimated cost by way of a financial contribution(s) attached to a grant of permission for the proposed LRD. However, as agreed in principle with SDCC, it is considered the cost of constructing such an extension is to be paid on a pro-rata basis. Under the recent permission for 71 no. dwellings to the east, under Ref. SD23A/0083, the pro-rate payment was agreed. Permission was granted for 71 no. dwellings under Ref. SD23A/0083, and condition no. 21 attached to same requires the following:

"Condition No. 21 - Contribution in lieu of Community Floorspace

In accordance with the submitted response to the Clarification of Further Information on Item no.5 on 15th December 2023 and prior to occupation of the first 35 units or as otherwise agreed in writing with the Planning Authority, the applicant shall pay a financial contribution of €108,000 (one hundred and eight thousand euros) towards the delivery of upgrades, extensions and/or new community centres in the area. The financial contribution is in lieu of the provision of community floorspace on-site.

REASON: *To provide for community floorspace in accordance with Policy COS 3, Objective COS3 Objective 1, Objective 2 and Objective 3 of the South Dublin County Development Plan 2022 – 2028".*

The above condition is based on the total number of residential units proposed in that application (71 no. dwellings) and the capacity of the applicant's remaining landholding on the western side of the Ballycullen-Oldcourt Local Area Plan lands which are now proposed to be developed as part this LRD application (approximately 523 no. dwellings).

The number of residential units proposed in the subject LRD application equates to c.88% the total units to be delivered on the applicant's lands on the western side of the Ballycullen-Oldcourt Local Area Plan lands i.e. 523 no. residential units in the subject application out of a total of 593 no. residential units (the subject application of 523 no. units plus the permitted 71 no. units under Ref. SD23A/0083).

In keeping with the agreed principle and the decision of the Planning Authority to attach condition no. 21 to planning permission Ref. SD23A/0083, it is put forward to the Planning Authority that any forthcoming grant of permission for the proposed LRD should attach a financial contribution of €792,000.00 towards the cost of constructing an extension to an existing

community centre in the area (i.e. 88% of the €900,000.00 total estimated cost), with the balance of the €900,000.00 estimated cost (i.e. €108,000) to be paid as part of the grant of permission under Ref. SD23A/0083.

We confirm that the applicant has no objection to such a condition being attached to a decision to grant permission for the proposed LRD, should the Planning Authority be minded to do so, and it is respectfully suggested that such a condition may be worded as follows:

"In lieu of the provision of community floorspace as referenced in the Ballycullen-Oldcourt Local Area Plan, 2014 (as extended), the developer shall pay to the Planning Authority a financial contribution of €792,000.00 towards the delivery of upgrades, extensions and/or new community centres in the area. The financial contribution is in lieu of the provision of community floorspace on-site.

REASON: To provide for community floorspace in accordance with Policy COS 3, Objective COS3 Objective 1, Objective 2 and Objective 3 of the South Dublin County Development Plan 2022 – 2028

Notwithstanding the above, for the avoidance of doubt and in the interests of clarity, we wish to state the applicant is fully satisfied to pay a financial contribution in lieu of the provision of community floorspace within the proposed development, to be put towards the cost of extending an existing community centre in the area, in accordance with the objectives of the South Dublin County Development Plan 2022-2028. The applicant will adhere to any such condition relating to a financial contribution for community floorspace attached to a forthcoming grant of permission attached to this LRD and that the payment of such a contribution represents the full and final payment of such a contribution in relation to the provision of a community facility for the Plan lands.

7.15 Public Open Space Provision

7.15.1 Quantum of Public Open Space

The proposed development provides for approximately 73,754.8sq.m (c.7.37 hectares) of open space which equates to c. 36% of the gross site area.

We note that the CDP requirement for the provision of public open space, as per section 8.7.3 of same, states: *"The overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element"*. Furthermore, we note that Table 8.2 of the CDP sets out the public open space standards as follows:

Land Use	Public Open Space Standards (minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area

Fig. 32 – Extract from Table 8.2: Public Open Space Standards of CDP.

We note that the LRD Opinion (Ref. LRDOP001/24) for the subject proposal issued by the Planning Authority states the following in relation to public open space requirements:

"The South Dublin County Development Plan 2022 – 2028 policy on public open space provides for 15% provision of public open space on 'RES-N' lands and, in addition, seeks a contribution towards, or provision of, 2.4 Ha. of quality public open space per 1,000 persons. The applicant should note that in the absence of a supporting Development Contribution Scheme and having regard to Section 8.7.4 Delivery of Public Open Space and Contributions in Lieu and COS5 Objective 5-7, the Planning Authority is currently refraining from implementing CDP provisions requiring 2.4ha of public open space per 1000 population. The Planning Authority will continue to implement its policy provisions in relation to minimum on-site public open space provision of 15% for New Residential Development on Lands zoned 'RES-N', with 10% requirement on all other land use zonings, as per COS5 Objective 4 and in accordance with details set out in Table 8.2. It is noted that the applicant is proposing open space in accordance with the requirements of the Development Plan".

Taking the above into account, the 15% public open space requirement for the proposed development equates to 30,640.4sq.m (c.3.06Ha). Therefore, the proposal to provide c. 7.37Ha of public open space exceeds the minimum requirement.

Notwithstanding the above, in relation to the CDP's requirement for an overall standard of 2.4 hectares of public open space per 1,000 population, the proposed LRD requires the following public open space provision, based upon the proposed housing mix:

Unit Mix (Total)	No. of Units
1 bed	51
2 bed	168
3 bed	270
4 bed	34
Total Units	523

Table 30 – Overall proposed housing mix

COS5 Objective 6 of the existing CDP states: *"public open space calculations [are required to] be based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms."*

As detailed above, the proposed development caters for 219 no. dwellings with two or fewer bedrooms and 304 no. dwellings with three or more bedrooms. The occupancy rate for the proposed development is therefore as follows:

- 219 no. dwellings x 1.5 persons = 328.5 persons
- 304 no. dwellings x 3.5 persons = 1,064 persons
- Total occupancy = 1,393 persons

Based on a provision of 2.4 hectares of public open space per 1,000 population, the proposed development therefore requires the following quantum of public open space:

- 1,393 persons / 1000 (population) x 2.4 (hectares of open space) = 3.34 hectares (c.33,432 sq.m) of public open space.

The proposed development caters for approximately 73,754.8sq.m (c.7.37 hectares) of public open space and therefore complies with section 8.7.3. of the existing CDP.

Notwithstanding the above, we refer to the enclosed submitted Gannon & Associates, Landscape Architects drawing no. 23130_OLDCOURT_LP_E-POS-Public Open Space, which illustrates the provision of open spaces across the entire site. While there is a total of 73,754.8sq.m (c.7.37 hectares) of open space proposed in the public realm, useable to all, this is further broken down as follows:

- **Public Open Space** i.e. Oldcourt Park + Linera Parks in Neighbourhood Zone 1 + Pocket Parks in Neighbourhood Zone 3 = 32,456sq.m (3.24Ha) – this equates to c.16% of the site area.
- **Environmental Open Space** i.e. the proposed Bio-Retention Park in Neighbourhood Zone 4, and various other environmental open spaces in each of the 4 no. Neighbourhood Zones = 37,702sq.m (3.77Ha) – this equates to c.19% of the site area.

7.15.2. Design & Location of Public Open Space

The primary piece of public open space proposed as part of this LRD is “Oldcourt Park” which is located north of the east-west main link street, directly opposite Neighbourhood Zone 1 and abutting Neighbourhood Zone 2. Please refer to the enclosed Davey+Smith drawing no. MP07 “Proposed Open Space” drawing which identifies the location, area and type of all proposed open spaces.

Oldcourt Park occupies an area of 23,587.7sq.m (c.2.36Ha). It will be directly accessible from the main link street, with various pedestrian/cyclist crossings provided for allowing ease of access. Abutting this park, on the northern side of the main link street are dedicated pedestrian and cycle paths. In addition, the proposed development provides for pedestrian and cyclist paths directly from Oldcourt Park (at its north-eastern corner) into Dodderbrook to the north, while its north-western corner also caters for access into Dodderbrook as well.

Gannon & Associates, Landscape Architects have prepared the submitted landscape design for the proposed development and have liaised with SDCC Parks Department prior to submitting this application for permission, and met their representatives on site to discuss the landscape strategy for the overall development, including Oldcourt Park. In addition, the proposed landscape design has been fully coordinated with the drainage proposals, particularly in the creation of SUDS proposals. For example, the proposed Oldcourt Park incorporates:

- **Sensory play areas:** Designing SUDS with sensory play elements aims to engage both children and adults. Resources such as stones and large logs are proposed. These elements stimulate the senses, encourage exploration and promote well-being.
- **Biodiversity/ net gain:** The SUDS strategies also focus on enhancing biodiversity. Measures include planting native species that support local wildlife, creating habitats such as wildflower meadows, and incorporating green corridors to connect natural areas.

The proposed SUDS network utilises the contours of the land and adopts specific strategies to manage water runoff in a sustainable way. The aim is to mitigate environmental impacts and promote water management practices that would improve the quality of local water resources. It should be noted that there are no attenuation tanks proposed underground and that the proposed surface water design is based upon natural solutions and has been fully coordinated into the proposed landscape design.

Another key principle in the landscape design is the retention of hedgerows throughout the site and the incorporation of same into public open spaces. A high level image of this concept is illustrated in Fig. 32 below, which is taken from the submitted Landscape Design Rationale prepared by Gannon & Associates, Landscape Architects.

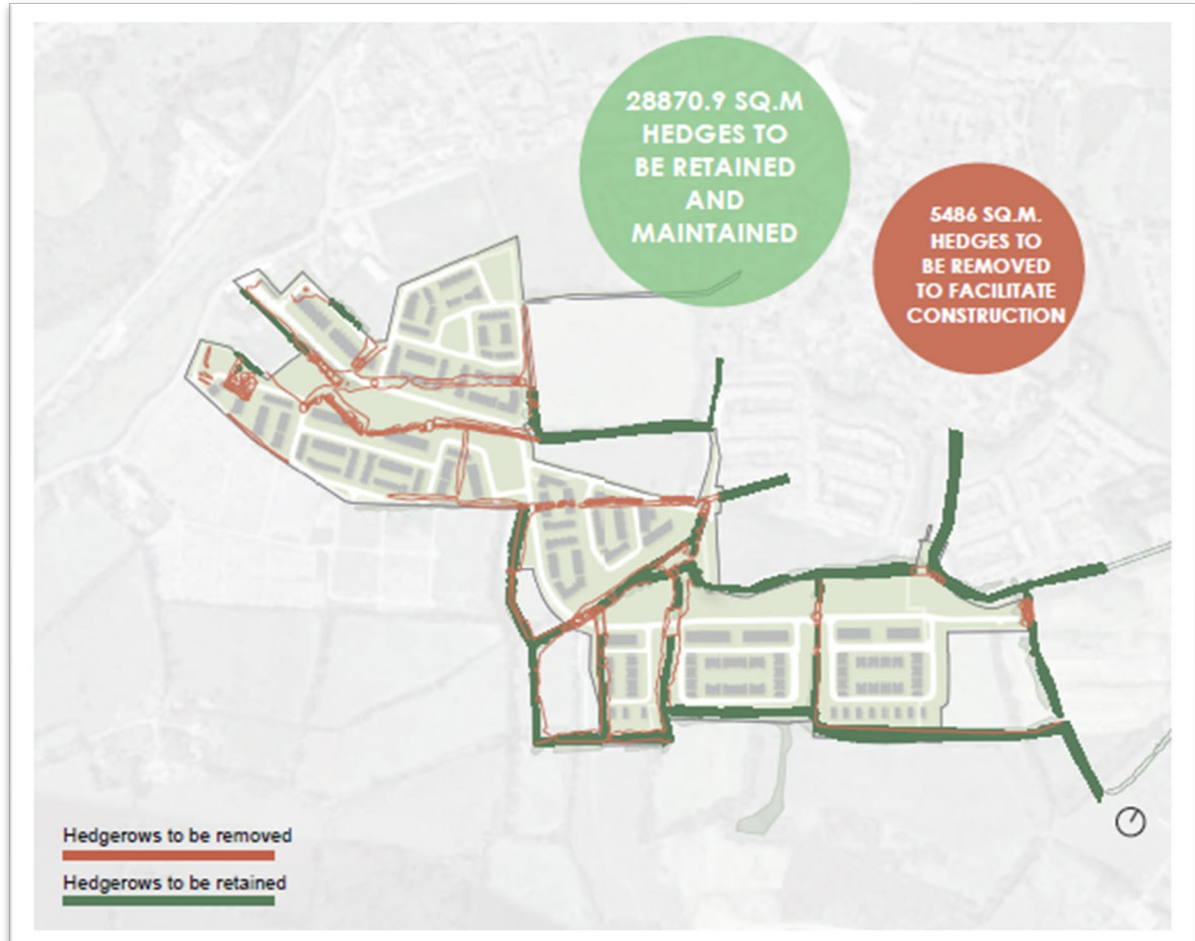


Fig. 33 – Hedgerow retention as part of the proposed landscape design

Hedgerows are to be retained to the greatest extent possible, with removal considered only when necessary for the implementation of larger connecting structures, such as the east-west main link street, which is also an objective of the CDP and LAP. The integration and preservation of hedgerows are integral to the soundscape concept of the overall landscape proposal, 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. An Arboricultural Assessment, prepared by Arborist Associates is included with this LRD planning application and its recommendations incorporated into the proposed landscape design – please refer to same for further details.

As part of the landscape proposal, it has been proposed that the existing trees and hedgerows will receive rigorous protection, including the implementation of a 10-meter protection zone around them. In alignment with Objective GI3, which aims to promote and protect native riparian vegetation along all watercourses, a vegetated riparian buffer of at least 10 meters from the top of the riverbank will be maintained or restored within the development area. Additionally, during construction, a tree protection fence will be proposed to safeguard the trees and shrubs, in accordance with BS 5837:2012.

The landscape design for the overall development encompasses a diverse range of dedicated areas for various activities, creating a comprehensive array of options across its expanse. Activities range from fitness zones and playgrounds to running tracks, catering to a wide range of preferences. Thoughtfully designed serene and contemplative spaces offer moments of rest and relaxation, while designated areas for the appreciation of natural sounds enhance the sensory experience of the environment. The organic distribution of pocket parks, seamlessly integrated into the fabric of the site, imparts distinctive uniqueness to each space. Each pocket park has its individual identity, contributing to the formation of a harmonious tapestry where activities unfold in a fluid and integrated manner. This meticulous design approach reflects a commitment to providing an inclusive and integrated space where the community can engage in a variety of outdoor activities. Whether for physical exercise, children's recreation, invigorating runs, or moments of contemplation, the site stands as an open invitation to explore and enjoy a diverse range of experiences, always in harmony with the surrounding nature.

Within Oldcourt Park, the landscape design has diversified the playground equipment, which includes areas for toddlers, wheelchair users, and teenagers. The playground equipment is integrated with the topography and SUDS, using public space to create opportunities for natural play with large wooden logs, stones, and similar elements. Hardscape materials suitable for play areas have been used, and all playgrounds are located in communal spaces with engineered woodchip surfacing.

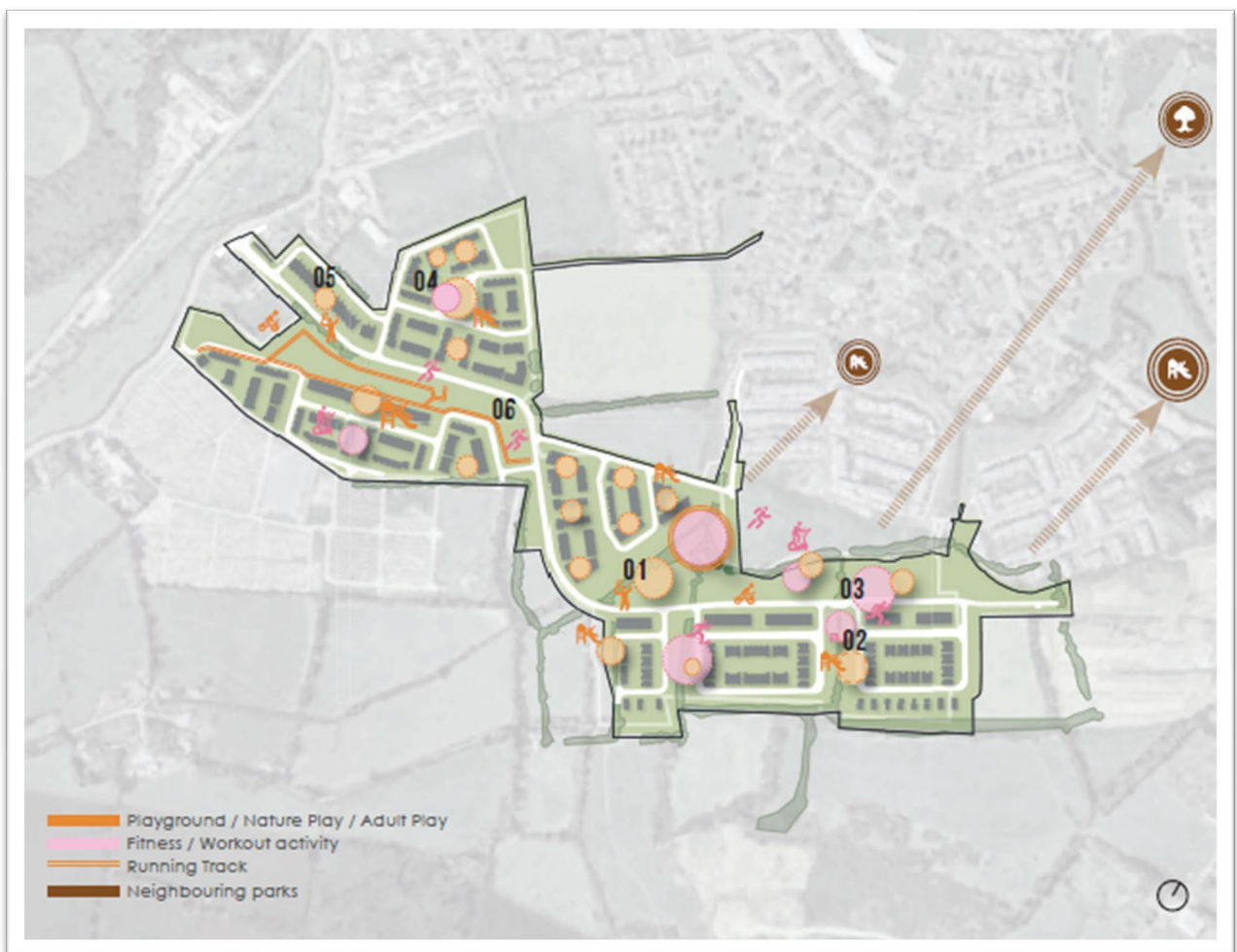


Fig. 34 – Proposed Recreational Facilities



Fig. 35 – Proposed Landscape Design for Oldcourt Park

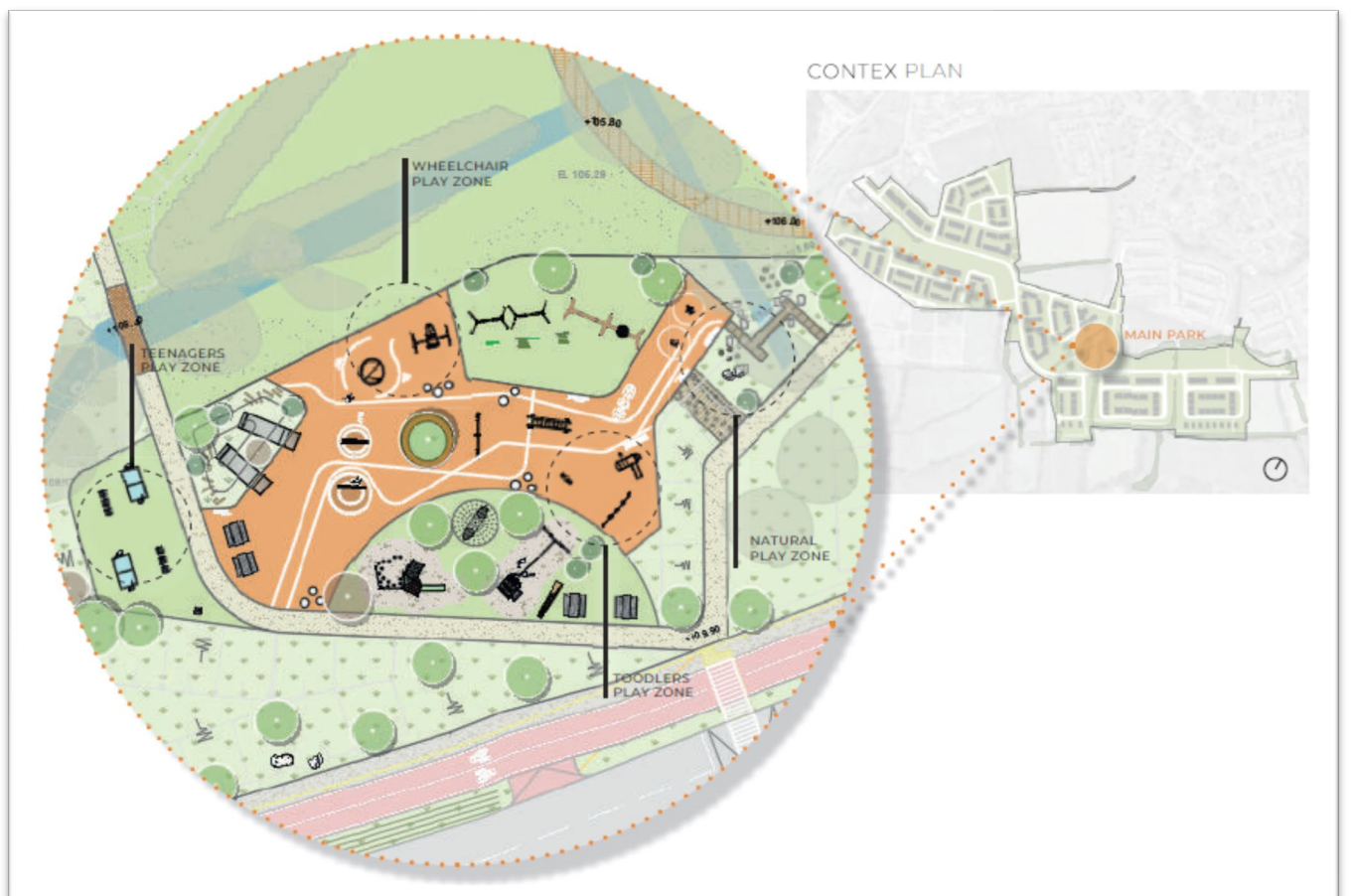


Fig. 36 – Proposed Play in Oldcourt Park

The landscape design has diversified the playground equipment, as exemplified in Oldcourt Park, which includes areas for toddlers, wheelchair users, and teenagers. The playground equipment is integrated with the topography and SUDS, using public space to create opportunities for natural play with large wooden logs, stones, and similar elements.

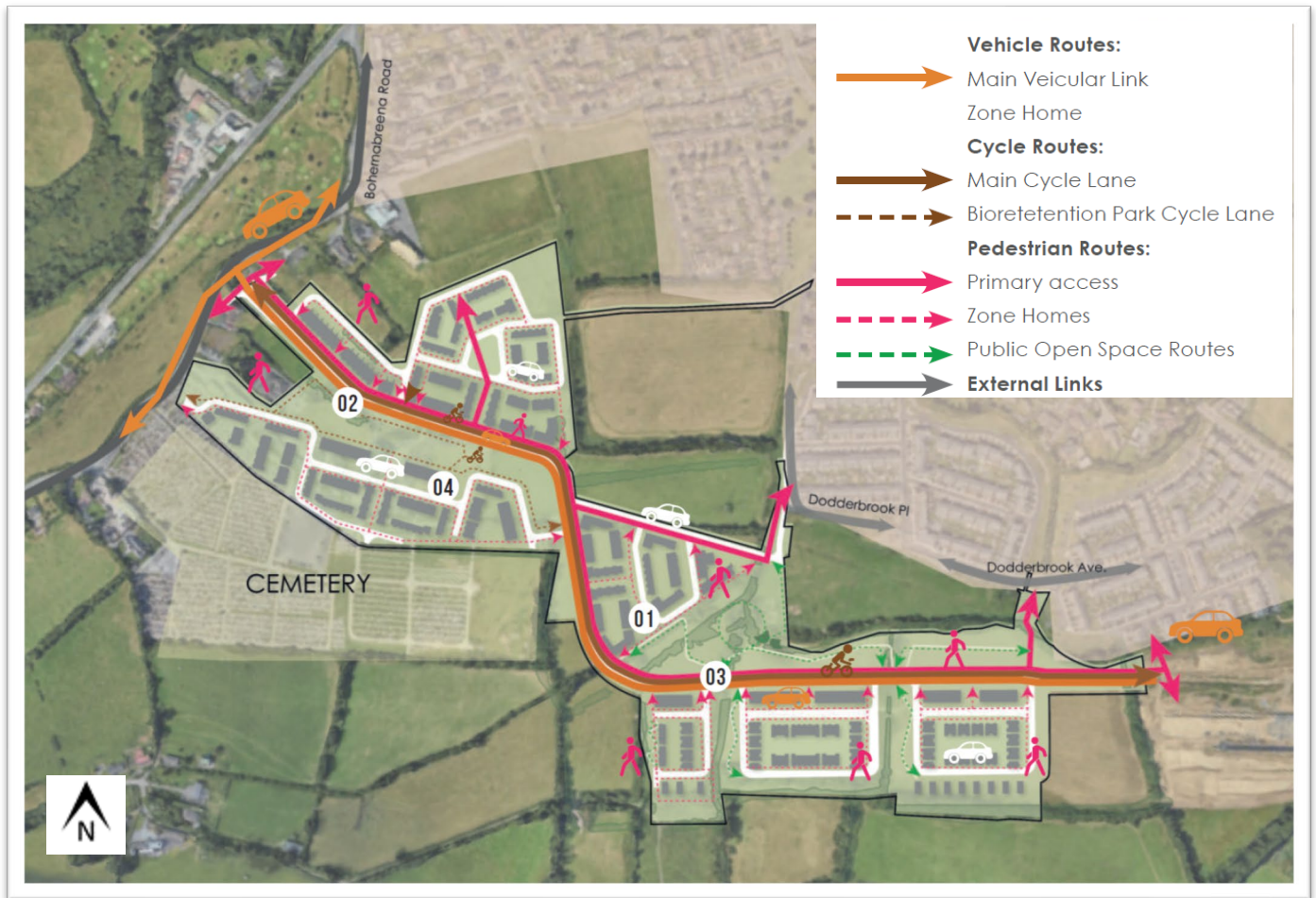


Fig. 37 – Proposed Permeability & Accessibility

The proposed development includes the implementation of the east-west main link street strategically crossing the site, providing efficient connectivity. From this main route, various secondary routes have been designed and integrated for both vehicles and pedestrians. This approach aims to create a comprehensive network of access, facilitating movement and interaction between different areas of the location. 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.

Another key area of public open space is the proposed Bioretention Park in Neighbourhood Zone 4, in the western part of the proposed development. This public open space occupies an area of c.1.5Ha.

The bio-retention park, characterized by its sinuous and curvy lines, is designed to blend harmoniously with the natural environment and the layout of Oldcourt Park. It serves a crucial ecological role by acting as a sustainable stormwater management system, mitigating water runoff effects. Through its strategically designed depressions and vegetation, the park effectively absorbs, filters, and cleanses stormwater, removing pollutants and preventing them from contaminating local water bodies. This function not only protects the environment but also improves the quality of nearby water resources. Beyond its environmental benefits, the bio-retention park enhances community well-being with its winding pathways and lush greenery, creating a peaceful space for recreation, relaxation, and nature connection. The running track, which follows the park's organic lines, promotes physical activity, encouraging a healthy lifestyle for residents and visitors. In essence, the bioretention park exemplifies

sustainable urban planning by seamlessly integrating aesthetic appeal with ecological functionality, providing a natural oasis within the urban landscape.

As part of the ongoing quest to link the bio-retention park to the residences, the extension of the park's main path has been developed, giving rise to new activity areas. This expansion includes the implementation of a playground and fitness area, as well as proposed gardens and a natural play zone next to a mitigation area. This extension not only promotes connectivity between the park and the residences, but also provides additional spaces for recreational and wellness activities

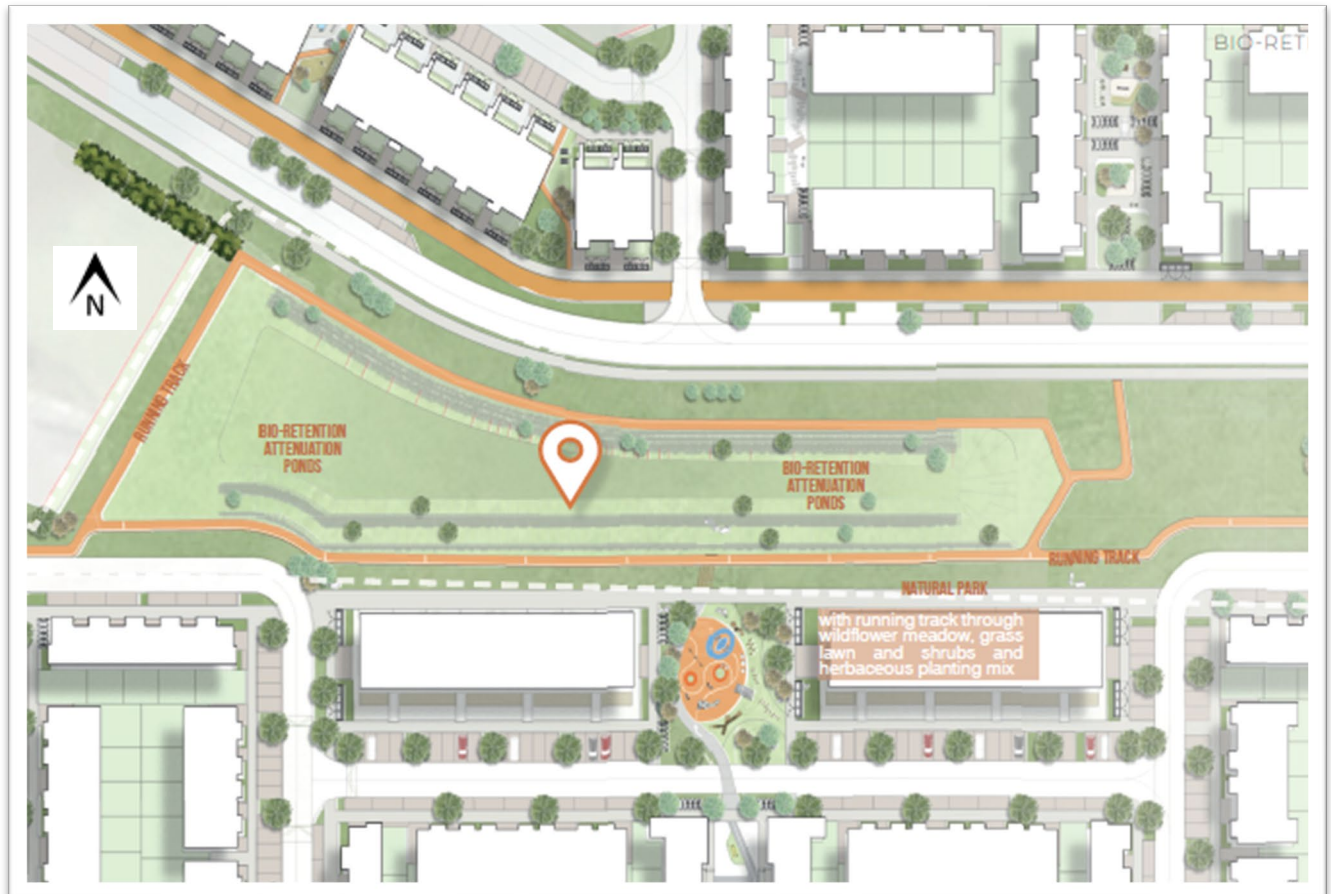


Fig. 38 – Proposed Bio-retention Park in Neighbourhood Zone 4

In Neighbourhood Zone 1, three linear parks, acting as public open space are proposed, which are seamlessly connected through a shared surface to Oldcourt Park directly opposite to the north, and uphold the core concept of sinuous lines and ecological harmony. In keeping with the design of Oldcourt Park, the existing hedgerows have been carefully preserved, and thoughtfully designed activity zones, natural play spaces, and comfortable seating and resting areas have been integrated.



Fig. 39 – Proposed public open spaces in Neighbourhood Zone 1

The proposed landscape design has had regard to ecological considerations with the enclosed landscape design rationale setting out details of the incorporation of next boxes for birds, creation of earth banks for mining bees, installation of bat and bug boxes and planting pollinator friendly planting mix – please refer to the enclosed landscape design rationale for details.

For details on the breakdown of the proposed public open spaces, each space can be identified on the enclosed Davey+Smith drawing no. MP07 “Proposed Open Space” drawing and on the submitted Gannon & Associates, Landscape Architects drawing no. 23130_OLDCOURT_LP_E-POS-Public Open Space – please refer to both.

The submitted Landscape Design Rationale and supporting landscaping proposals prepared by Gannon + Associates demonstrate that a high-quality of landscaping has been applied to the proposed development to provide for a variety of recreational activities as part of a coherent green infrastructure strategy for the site, in compliance with the policies and objectives of the existing South Dublin CDP.

It is noted that **Objective GI33** of the Ballycullen-Oldcourt LAP states: “Public open space shall be provided at a minimum rate of 20% of development sites on the Lower Slope and Mid Slope Lands and 30% on the Upper Slope Lands. With the exception of lands located within the wayleave of 110kV and 220 kV overhead transmission lines, only public open spaces that fall within the hierarchy of spaces and functions detailed in Table 5.3 (Section 5.2) shall be included in the calculation of public open space.”

As previously discussed, the subject site is identified as being in the majority on the “Mid Slope” land and, as such, the proposed public open space provision is considered to be wholly appropriate and in accordance with the requirements of the Ballycullen-Oldcourt LAP.

7.16 Communal Open Space

In addition to the above detailed public open space provision, the proposed development also caters for the appropriate provision of communal open space. The communal open space provision is put forward in compliance with the minimum standards stated in Appendix 1 of the Apartment Guidelines. The Apartment Guidelines set out the following standards in relation to communal open space provision (per unit):

- Studio Unit – 4 sq.m
- One bedroom unit – 5 sq.m
- Two bedroom (three person unit) – 6 sq.m
- Two bedroom (four person unit) – 7 sq.m
- Three person unit – 9 sq.m

Based on the mix of apartments and duplex units proposed (with no studio units proposed), the development has the following requirement for communal open space:

Apartment / Duplex Type	No. of Units Proposed	Required Communal Open Space Per Unit (sq.m)	Total Communal Open Space Required (sq.m)
One Bed Unit	51	5	255
Two Bed (Three Person) Unit	11	6	66
Two Bed (Four Person) Unit	96	7	672
Three Bed Unit	110	9	990
Total	268	-	1,983m²

Table 31 - Communal Open Space Requirements.

As detailed in Table 31, above, the proposed development has a requirement for the provision of 1,983sq.m of communal open space. The proposed development puts forward a total provision of 5,505sq.m of communal open space and, therefore, complies with the above requirement.

The communal open space provision for the development is provided in 18 no. individual communal open space areas located adjacent to each proposed apartment and duplex block, ranging in various sizes from c.404sq.m (in Neighbourhood Zone 2) to c.695sq.m (in Neighbourhood Zone 4), with the 18 no. spaces totalling 5,505sq.m. In addition, communal open space is also provided at roof level (1st floor) of Block D, providing a space of c.38.5sq.m for the use of the residents of that building.

Table 32 overleaf provides a breakdown of the proposed communal open spaces per Neighbourhood Zone and each of these can be identified on the enclosed Davey+Smith drawing no. MP07 “Proposed Open Space” drawing and on the submitted Gannon & Associates, Landscape Architects drawing no. 23130_OLD COURT_LP_E-POS-Public Open Space – please refer to both. The location and orientation of each communal open space has been carefully considered to maximise use of space and receipt of sunlight and daylight throughout the day. We confirm, for clarity, the above stated communal open space provision is provided for in addition to the proposed private and public open space provisions.

The proposed communal open space areas are clearly defined and distinguished by proposed boundary treatments, landscaped to a high-quality, provide for adequate daylight and sunlight access and be functional and usable to a range of activities including for: children's play, passive recreation and leisurely activities such as games and exercise.

It is considered evident from the submitted proposals that the overall communal open space provision complies with and exceeds the minimum standards for same and is provided for as a mix of ground floor communal spaces and roof terraces.

Neighbourhood Zone 1	Area (m ²)
	311.6
	250.1
	276.7
Total	838.4
Neighbourhood Zone 2	Area (m ²)
	259.7
	404.7
	397.4
	166.8
	161.4
	111
Total	1,501
Neighbourhood Zone 3	Area (m ²)
	186.5
	626.2
	177.7
	190.9
	161.2
	358.1
Total	1,700.6
Neighbourhood Zone 4	Area (m ²)
	694.5
	420.9
	350.5
Total	1,465.9
Overall Total	5,505.9m²

Table 32 - Communal Open Space Provision

7.17 Proposed Private Open Space

Private open space associated with the residential units is provided in the form of rear gardens for proposed houses and ground floor terraces / upper floor balconies for proposed apartments and duplex units. The location and orientation of each private open space has been carefully considered to maximise use of space and receipt of sunlight and daylight throughout the day.

All private open space areas for the proposed apartments and duplex units have been designed to comply with the spatial requirements of Appendix 1 of the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities (2023), which are also replicated in Table 3.21 of the existing South Dublin CDP.

In relation to private open space areas for the proposed houses, we note the requirements of Table 3.20 of the existing South Dublin CDP which detail the spatial requirements for private

open space associated with houses. In general, the proposed development complies with these stated standards and provides for generous gardens sizes; however, it should also be noted the proposed layout has also been designed with regard to the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities which came into effect as Section 28 Ministerial Guidelines early this year.

SPPR 2 of the aforementioned guidelines sets out the minimum private open space standards for new houses as follows:

- 1 bed house – 20 sq.m
- 2 bed house – 30 sq.m
- 3 bed house – 40 sq.m
- 4 bed house – 50 sq.m

The proposed development caters for private open space (i.e. gardens) for the proposed houses which range in size from 33.3 sq.m for a 2 bedroom house to 113.3 sq.m for a 4 bedroom house, which complies with the minimum private open space standards stated in SPPR 2 of the Sustainable Residential Development and Compact Settlements Guidelines. As directed by the Compact Settlements Guidelines, the private open spaces associated with the proposed houses forms part of the curtilage of the house, is designed to a high standard, and is directly accessible from the principal living area of the house it serves.

We refer the reader to the submitted HQA which sets out the private open space afforded to each individual dwelling, and demonstrates the proposed LRD's compliance with the minimum private open space standards of the both the Sustainable Residential Development and Compact Settlements Guidelines, 2024, and, where applicable, the existing South Dublin CDP, and the Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities, 2023 – please refer to same for full details. In addition, please also refer to the site layout plans for each of the four proposed Neighbourhood Zones (Davey + Smith drawing no.s MP18, MP19, MP20 & MP21) which details the private open space afforded to each house. Please also refer to the floor plans of the proposed apartments and duplex units for details of the private open space provision for each apartment / duplex units and urban duplex unit.

7.18. Accessibility / Movement & Proposals to Integrate with Surrounding Land Uses

A key component of the proposed development is the provision and completion of the east-west main link street through the centre of the site, that will connect Oldcourt Road (R113) to the east with Bohernabreena Road (L7114) to the west. This main link street was identified in the Ballycullen – Oldcourt LAP under its Accessibility and Movement strategy (section 5.2 of the LAP) which required the provision of a new “Main Link Street” (a primary street) that will connect the Oldcourt Road with the Bohernabreena Road. The aim is to open up the Plan lands with a clear hierarchy of integrated streets for universal movement to include pedestrians, vehicles and cyclists. This will include the main link street which will then be fed by Local Link Streets (secondary streets) and Local Streets (tertiary streets) that will open up the lands for residential development.

We also note that the current CDP includes the Ballycullen – Oldcourt Street Network in its Six Year Road Programme (Table 7.5), and as identified on the land use zoning map (map no. 9) for the area – refer to Fig. 40 overleaf:

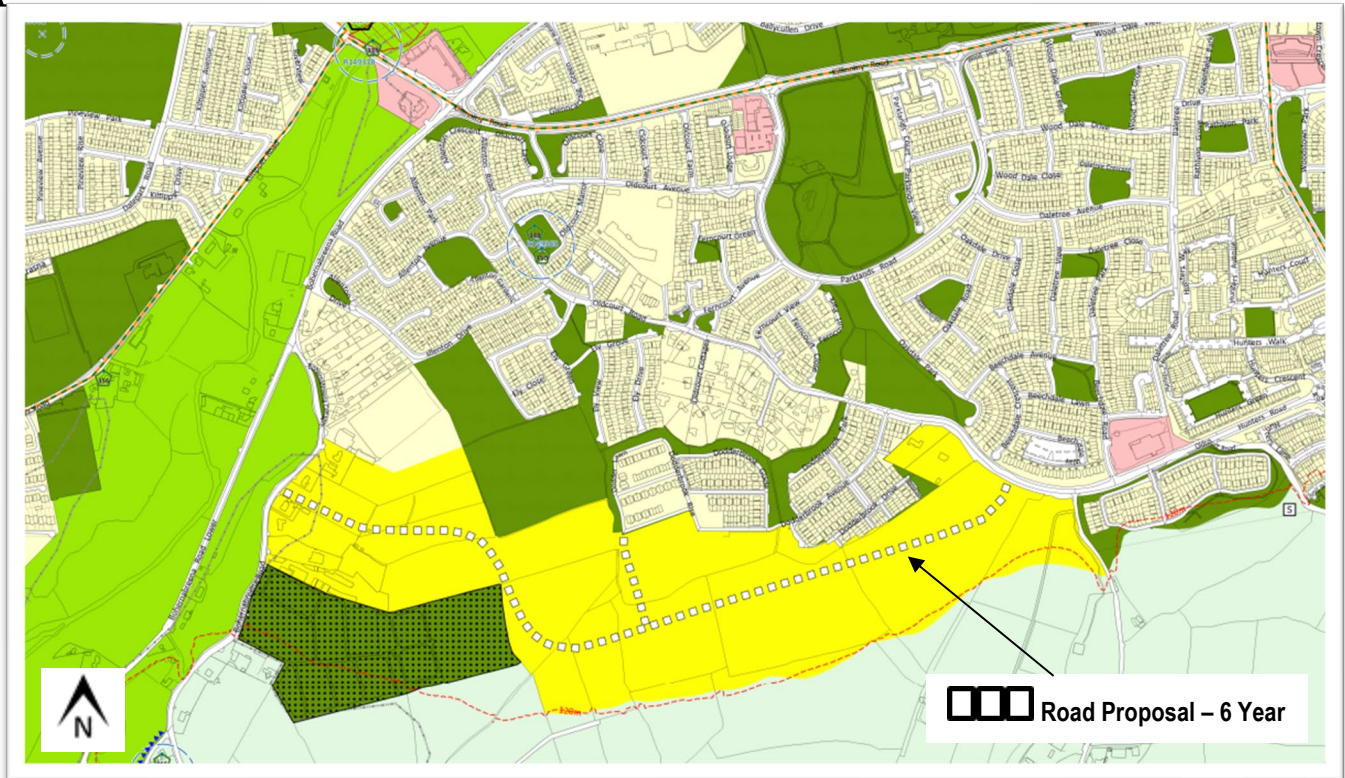


Fig. 40 - Extract from CDP Land Use Zoning Map No. 9 – illustrating Ballycullen – Oldcourt Street Network in CDP Six Year Road Programme

It should be noted that permission was previously granted for the development of the Main Link Street, under Ref. SD17A/0041 and An Bord Pleanála Ref. PL06S.249367, but it was never completed. The initial portion of the road has been completed under a separate permission to the immediate east (Ref. SD17A/0468) as part of the Ballycullen Gate development that is under construction.

The proposed main link street incorporates a two-way cycle path on its northern site with dedicated footpaths throughout. Ease of accessibility to the various neighbourhood zones and open spaces, particularly Oldcourt Park are provided for.

As per the CDP map above, vehicular access into Dodderbrook to the north, at Dodderbrook Place is proposed. Pedestrian and cyclist access from the proposed development is also provided into Dodderbrook, at Dodderbrook Avenue and to the north-west into St. Anne's GAA club.

The design of the proposed main link street includes for the provision of 2 no. bus stops along its length. Based on feedback from the NTA, these bus stops will not be provided for in this application. Instead, the bus stops have been identified and allowed for their retrofitting across the footpath/cycle path at some point in the future, which will further aid a transition to more sustainable transport modes. Please refer to the submitted roads engineering details prepared by Pinnacle Consulting Engineers for further details.

One of the main design criteria for a development of this scale is to ensure high quality pedestrian and cyclist permeability which will allow one to easily move through the development whilst also accessing neighbouring developments such as Dodderbrook to the north and Ballycullen Gate to the east, as well as facilitating visual and physical links to the mountains to the south. The image blow in Fig. 38, illustrates the high-level connectivity and accessibility strategy applied to the proposed development.



Fig. 41 – Proposed access / movement strategy for proposed development

From this main east-west link street, various secondary routes have been designed and integrated for both vehicles, pedestrians and cyclists. This approach aims to create a comprehensive network of access, facilitating movement and interaction between different areas of the overall 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. A coordinated effort has been made by the design team (architects, engineers and landscape architects) to ensure that the proposed development is successfully permeable and user friendly.

7.18.1 Vehicular Access

Vehicular access to the development will be via 4 no. access points, as follows: (i) from the west of the site via 2 no. accesses located off Bohernabreena Road, (ii) from the north of the site via 1 no. access at Dodderbrook Place, and (iii) from Oldcourt Road (the R113) to the east, via adjoining residential development, at Ballycullen Gate.

The proposed internal road network is put forward in compliance with the principles set out in The Design Manual for Urban Roads and Streets (DMURS) (2019), with the proposed development seeking to put well-designed streets at the heart of this new sustainable community, promote alternatives to car use and encourage lower vehicular speeds to create a safe and attractive environment for future residents. To this end, the design of the proposed development has sought to provide for 'self-regulating streets' in compliance with section 4.1.2. of DMURS, with both physical and psychological measures adopted to lower the speeds and to discourage the development from being used as a through route and/or rat run. Please also refer to the submitted DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers.



In addition, Pinnacle Consulting Engineers have carried out an autotrack analysis on the internal service access as part of the submitted details to demonstrate the development's capability to cater for both residents and service vehicles such as refuse / emergency vehicles. The results of this analysis demonstrate the design of the proposed layout can accommodate the anticipated service vehicles that will serve the proposed development. Please refer to the enclosed transportation drawings and Transport Statement prepared by Pinnacle Consulting Engineers for full details of same.

The suggested 'road hierarchy' for the proposed development is detailed in the submitted Drawing No.s P211102-PIN-XX-DR-D-105-S1 prepared by Pinnacle Consulting Engineers – please refer to same for further details. In addition, we also refer the Planning Authority to the submitted Traffic and Transport Statement prepared by Pinnacle Consulting Engineers for further details on the proposed road network, expected trip generation etc.

7.18.2 Pedestrian / Cyclist Access

The proposed development includes for pedestrian and cyclist connections and accesses to adjoining lands to the north, east and west, and includes for cycling and pedestrian routes and infrastructure throughout.

As part of the proposed development, the entirety of the site will be opened up to pedestrian and cyclist permeability, inviting people into this new suburban neighbourhood, with the proposed design seeking to provide multiple pedestrian / cyclist access points to help to integrate the development with its surroundings. All site access and internal circulation arrangements ensure the development is a safe and pedestrian / cyclist friendly environment for future residents and visitors alike.

The proposed development has been designed to ensure there is good permeability for pedestrians and cyclists with connections between the internal layout and existing external pedestrian and cycle networks forming part of the overall access strategy for the wider lands. Within the development, pedestrian movement is suitably catered for by footpath connections within and adjacent to the development, providing good links to the surrounding urban areas. Along the entire route of the proposed main link street, a segregated pedestrian path and two way cycle track is catered for, ensuring pedestrians / cyclists are given priority within the development. In addition, the development also includes pedestrian and cyclist connections and accesses to adjoining lands to the north, east and west, and includes cycling / pedestrian routes and infrastructure throughout the development on local streets and through areas of public open space, with an ample provision of bicycle parking proposed. Please also note that in Neighbourhood Zone 3, to the north-west and abutting St. Anne's GAA club, the site layout plan provides for a pedestrian / cyclist connection into the GAA club lands.

The proposed layout has sought to ensure vehicular access will be restricted in areas where there are likely to be the highest concentrations of pedestrian/cycle movements. The internal site layout will include several crossing facilities that are located along key desire lines and coordinate well with the circulation within proposed car parking areas to enhance the safety, visibility, and convenience of those people on foot / bike. These facilities will include features such as tactile paving and surface treatments that will benefit all users and assist those with impaired mobility.

Footpaths will be provided in accordance with Section 4.3.1 of DMURS, which suggests that a minimum 1.8m footpath should be provided on all footways. Accordingly, the proposed development is consistent with the principles outlined in DMURS, which is affirmed by the enclosed DMURS Statement of Compliance prepared by Pinnacle Consulting Engineers.

Please refer to the submitted transportation drawings and Traffic and Transport Statement prepared by Pinnacle Consulting Engineers for full details on the pedestrian / cyclist route proposed within the development. Please also refer to the submitted landscaping proposals and Landscape Design Rationale prepared by Gannon & Associates Landscape Architects for details on the street design.

7.19 Car Parking

In total, the proposed development caters for 746no. car parking spaces provided for in a mix of on-street and on-curtilage parking.

The car parking standards of the existing South Dublin CDP are detailed in Table 12.26 of the CDP. Figure 41, below, illustrates Figure 12.26 of the CDP. It is assumed the proposed development is located in 'Zone 1' (General rate applicable throughout the county) , while Table 33 below, details the car parking requirements based on these standards.

It is noted the CDP clearly details the car parking standards stated are **maximum parking rates** and that **"the number of spaces provided for any particular development should not exceed the maximum provision. The maximum provision should not be viewed as a target and a lower rate of parking may be acceptable."**

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces
House	1 Bed	1 space	1 space
	2 Bed	1.5 spaces	1.25 spaces
	3 Bed+	2 spaces	1.5 spaces

Fig. 42 - Extract of Figure 12.26 of the Existing CDP.

Based upon the standards set out in the CDP, Table 33 below demonstrates the maximum car parking provision allowable for the proposed development.

Proposed Unit Typologies	No. of Units Proposed	Maximum Car Parking Requirement
Two Bed House	61	91.5
Three Bed House	160	320
Four Bed House	34	68
One Bed Apartment / Duplex Unit	51	51
Two Bed Apartment / Duplex Unit	107	133.75
Three Bed Apartment / Duplex Unit	110	165
Total	523	829.25

Table 33 - Car Parking Requirement (Based on CDP Standards).

The overall proposed car parking provision is broken down as follows:

Parking	No. of Spaces	Ratio / Unit
Car Parking (Residential)	673	1.29 / unit
Car Parking (Non-Residential i.e. creche)	7	1 per classroom
Car Parking (Visitor / Set Down)	66	0.01
Total Car Parking	746	1.33/unit

Table 34 - Proposed Car Parking

It is noted the proposed car parking provision falls below the **maximum rate** applicable based on CDP standards; however, the quantum of proposed car parking is put forward with regard to the guidance contained in both the Apartment Guidelines and the Sustainable Residential Development and Compact Settlements Guidelines.

The Apartment Guidelines also have regard to car parking provisions for new developments containing apartments and as Section 28 Guidelines, take precedence over the CDP standards. To this end, the Apartment Guidelines seek to reduce car parking, where possible, in favour of more sustainable modes of transportation, and state, in section 4.20, *"the requirement for any such provision [of car parking] for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria."*

The Apartment Guidelines state the following with regard to 'Intermediate Urban Locations': *"In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities **must consider a reduced overall car parking standard** and apply an appropriate maximum car parking standard", [our emphasis added].*

The Apartment Guidelines also state the following with regard to 'Peripheral and/or Less Accessible Urban Locations':

"As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required."

Furthermore, the proposed car parking provision is also put forward with consideration to the recently published Sustainable Residential Development and Compact Settlements Guidelines, and SPPR 3 contained in same, which states:

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

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

(ii) In accessible locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

(iii) ***In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling***”.

If the maximum rate of 2 no. spaces per dwelling is applied to the proposed 255 no. houses, as per the new Compact Settlements Guidelines, and the benchmark rate of 1 no. space per house is applied to the proposed 268 no. apartments and duplex units, as per the Apartment Guidelines, the proposed development has the following car parking requirement:

Proposed Unit Typologies	No. of Units Proposed	Maximum Car Parking Requirement
Two Bed House	61	122
Three Bed House	160	320
Four Bed House	34	68
One Bed Apartment / Duplex Unit	51	51
Two Bed Apartment / Duplex Unit	107	107
Three Bed Apartment / Duplex Unit	110	110
Total	523	778

Table 35 - Car Parking Requirement (Section 28 Guidance)

The proposed development provides for 746 no. car parking spaces which accords with local and national policy regarding reduced car parking and maximum standards for same.

The proposed development also caters for an ample provision of bicycle parking as well as the provision of pedestrian and cyclist routes and infrastructure throughout the development. As such, it is considered evident that future residents will have ease of access to, and availability of, good jobs, services, and facilities via sustainable transport modes.

This LRD application for permission is accompanied by a Travel Plan, prepared by Pinnacle Consulting Engineers and enclosed as a separate document, which sets out measures to encourage future residents to use more sustainable transport modes such as bus services – please refer to same.

For further details on the proposed car parking provisions for the development, we refer the Planning Authority to the submitted transportation drawings and Traffic and Transport Statement prepared by Pinnacle Consulting Engineers.

7.20 Bicycle Parking

Bicycle parking for the proposed development is provided as follows:

Parking	No. of Spaces	Ratio / Unit
Bicycle Parking (Resi Long Stay)	1,024	1.96 / unit
Bicycle Parking (Non-Resi Long Stay i.e. creche)	14	2 per classroom
Bicycle Parking (Resi Short Stay)	225	0.43 / unit
Bicycle Parking (Non-Resi Short Stay i.e. creche)	5	0.7 per classroom
Total Bicycle Parking	1,268	2.42 / unit

Table 36 – Proposed Bicycle Parking

It is considered the proposed 255 no. houses will be capable of accommodating bicycle parking within the curtilage of the property, with mid-terrace units provided with secure bicycle stores on their driveways, and semi-detached and detached dwellings accommodating bicycles to the rear of the property. We enclose drawing no. MP22 "Overall Lands – Proposed Bikes Locations" which identifies the location and various type of bicycle parking proposed throughout the entire development.

In terms of the proposed apartments and duplex units, the standards of Table 12.23 of the existing CDP and the Apartment Guidelines, both of which require 1 no. long-term space per bedroom and 1 no. short-term space for every 2 no. apartments, are noted.

Based on the proposed unit mix, the proposed apartments / duplexes are afforded the following bicycle parking provisions:

Unit Type	No. of Units	Long-Term Parking	Short-Term Parking
1 bed	51	51	26
2 bed	107	214	54
3 bed	110	330	55
Total	268	595	135

Table 37 - Bicycle Parking for Proposed Apartment / Duplex Units

Based on the overall proposed development, the following is the overall bicycle parking provision:

Parking	No. of Spaces	Ratio / Unit
Bicycle Parking (Resi Long Stay)	1,024	1.96
Bicycle Parking (Non-Resi Long Stay i.e. creche)	14	2 per classroom
Bicycle Parking (Resi Short Stay)	225	0.43
Bicycle Parking (Non-Resi Short Stay i.e. creche)	5	0.7 per classroom
Total Bicycle Parking	1,268	2.42

Table 38 – Overall Proposed Bicycle Parking Units

7.21 Demolition

This LRD planning application also seeks permission to demolish all existing buildings on site. In the south-western part of the application site, there are 2 no. habitable dwellings and a number of outbuildings/sheds, that are all proposed to be demolished to accommodate the proposed development. We enclose Davey+Smith drawing no. MP05 which provides plans/elevations/sections of all of the buildings proposed to be demolished. The floor area of each structure is on the aforementioned drawing, with the total floor area to be demolished equating to 4,152.06sq.m. Please also note that Chapter 13 "Material Assets: Resource & Waste Management" includes Appendix 13.1 "Resource & Waste Management Plan" – please refer to same.

8.0 Statement of Effects of Environment and European Sites

8.1 Environmental Impact Assessment

An Environmental Impact Assessment Report (EIAR) is required for the proposed development as this LRD proposal is comprised of 523 no. dwellings, with associated crèche and all associated site development works. Therefore, the proposal exceeds the threshold of 500 dwelling units included in Schedule 5 Part 2(10)(b)(i) of the Planning and Development Regulations 2001 (as amended) which sets out the relevant thresholds which require the carrying out of an EIAR. The subject development falls within the threshold of Category 10 (b)(i) as it comprises the "*construction of more than 500 dwelling units*", and as such we refer the reader to the submitted EIAR, which is comprised of 2 no. volumes – Volume I being the Non-Technical Summary and Volume II, being the main EIAR.

The EIAR has been prepared in accordance with Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16th April 2014 as an amendment of Directive 2011/92/EU.

As required, the public notices for the development have detailed that an EIAR has been prepared as part of the application and that the EIAR is available for inspection and/or purchase from offices of South Dublin County Council. The EIAR has also been uploaded to national EIAR portal – a confirmation notice of same is enclosed with this LRD planning application. Furthermore, the EIAR is available to view on the dedicated application website set up by the applicant at www.oldcourtlrd.ie.

The EIAR has considered the likely, significant, and adverse effects of the proposed project on the receiving environment. Mitigation measures are included for to reduce impacts on the environment where considered necessary. These mitigation measures have been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate. For full details please refer to the EIAR which accompanies the application.

8.2 Appropriate Assessment

An Appropriate Assessment (AA) Screening Report and Natura Impact Statement (NIS) has been prepared by Enviroguide Consulting for the proposed LRD on the subject site. These are enclosed as separate standalone documents – please refer to both for full details.

The European sites relevant to the site are as follows:

- North Dublin Bay SAC No. 000206 – c.15km from subject site
- South Dublin Bay SAC No. 000210 – c.11km from subject site
- Glenasmole Valley SAC No. 001209 – c. 1.2km from subject site
- Wicklow Mountains SAC No. (002122) – c. 4km from subject site
- South Dublin Bay and River Tolka Estuary SPA No. 004024 – c. 11km from subject site
- North Bull Island SPA No. 004006 - c. 15km from subject site
- Wicklow Mountains SPA No. 004040 - c. 4km from subject site

In accordance with the Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Appropriate Assessment of the proposed development has been prepared by Enviroguide Consulting and is submitted as a separate document - please refer to same. The submitted AA Screening Report asserts that the proposed development has been assessed, taking into account:

- The nature, size and location of the proposed works and possible impacts arising from the construction works.
- The QIs and conservation objectives of the European sites
- The potential for in-combination effects arising from other plans and projects.

The AA Screening Report concludes that *“upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **may be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- North Dublin Bay SAC
- South Dublin Bay SAC
- South Dublin Bay and River Tolka Estuary SPA
- North Bull Island SPA
- Wicklow Mountains SPA

*However, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility **cannot be excluded** that the Proposed Development will have a significant effect on any of the European sites listed below:*

- Glenasmole Valley SAC
- Wicklow Mountains SAC

Glenasmole Valley SAC is located along the Ballinascorney Road, and as such the potential for significant impacts via inadvertent spread of invasive species by construction related traffic (commercial and private vehicles) could not be ruled out. In addition, it is considered that the likelihood for indirect impacts via potential water quality deterioration within the Dodder River on any otters associated with the Wicklow Mountains SAC that may inhabit the Dodder River in proximity to the Site, cannot be excluded in the absence of site-specific detail on best practice surface water protection measures.



On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on any European sites, whether arising from the project itself or in combination with other plans and projects, cannot be excluded. Thus, there is a requirement to proceed to Stage 2 of the AA process; and a NIS has been prepared and accompanies this submission under separate cover".

A Natura Impact Statement (NIS) has been prepared and is included as a separate document – please refer to same. The enclosed NIS concludes that

"This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed LRD at Bohernabreena, Oldcourt, Ballycullen, Co. Dublin, on the following European Sites:

- *Glenasmole Valley SAC (001209)*
- *Wicklow Mountains SAC (002122)*

The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction and operation, on the integrity and qualifying interests of the above European sites, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European sites, individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the Qis, SCIs and on the integrity and extent of Glenasmole Valley SAC or Wicklow Mountains SAC. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site".

9.0 Water Services Infrastructure

Pinnacle Consulting Engineers have prepared all of the proposed water / services infrastructure design. They have held meetings with Drainage Department of South Dublin County Council regarding surface water proposals, all of which are fully coordinated with the proposed landscaping design. In addition, Pinnacle Consulting Engineers have liaised with Irish Water in relation to foul and potable water for the proposed development, and a Confirmation of Feasibility for the proposed development was received from Uisce Éireann on 12th August 2024 (Ref. CDS23009245) and is enclosed in Appendix A of the submitted Engineering Services Report Part 2 prepared by Pinnacle Consulting Engineers.

Please refer to all of the submitted documentation and drawings prepared by Pinnacle Consulting Engineers for full details, with a summary only of same set out below:

9.1 Foul Drainage

A Confirmation of Feasibility (COF) (ref: CDS23009245) dated 12th August 2024, has since been received from Uisce Éireann with condition, summary of which is extracted below for ease of reference. The COF can be found in Appendix A of the submitted Engineering Services Report Part 2 prepared by Pinnacle Consulting Engineers.

“Wastewater Connection - Feasible Subject to upgrades

- According to a hydraulic modelling report for the catchment area, currently only Phase 1 (130 residential units) of the Development can be connect to the existing Uisce Éireann network.

- The remaining phases of the Development could be served via installation of interim pumping stations with adequate storage facilities, which would then be decommissioned once the network capacity downstream has been remediated by Uisce Éireann. The temporary pumping station rates and the storage volumes have to be reviewed and agreed at a connection application stage. Telemetry systems must be installed at the pumping station facilities.

- Currently, Uisce Éireann is working on solutions for the catchment which will provide the necessary network capacity for the permanent gravity connection”

In line with the Uisce Éireann stipulations in the COF, the eastern most connection (connection 1) shall service 130 units via gravity, discharging into the existing foul water gravity network to the north.

The remaining 393 units, creche and 3 external units shall be services by internal gravity networks which will discharge to the existing downstream foul network via temporary foul water pumping stations.

The pumping stations are designed such that the associated holding tanks allow for the onsite effluent to be pumped at off peak times, reducing the pressure on the downstream public foul network. The gravity network before and after the pumping stations are design such that the pumping stations can be taken offline should the downstream public network constrains be resolved negating need for the pump stations. Both pumping stations shall discharge into the existing foul water gravity networks located to the north of the subject site.

The pumping stations shall be designed in detail, should they still be required, at connection application stage and shall be fully compliant with Uisce Éireann (Irish Water) COP Part 5.

The foul drainage from the subject site will be discharged to the existing public foul water network via 3 No. outfall connections.

Connection 1: Gravity connection to the northeast of the site, the connection is proposed into the an existing Ø225mm public sewer located at the junction of Dodderbrook glade and Dodderbrook Avenue.

Connection 2: Temporarily pumped connection to the north of the site, it is proposed that a connection be made into the existing public Ø225mm foul sewer, located with Dodder Lawn Road in the northern located residential development of OCIL Phase 1.

Connection 3: Temporarily pumped connection to the north of the site, it is proposed that a connection be made into the existing public Ø225mm foul sewer, located within Ely View Road in the northern located residential development.

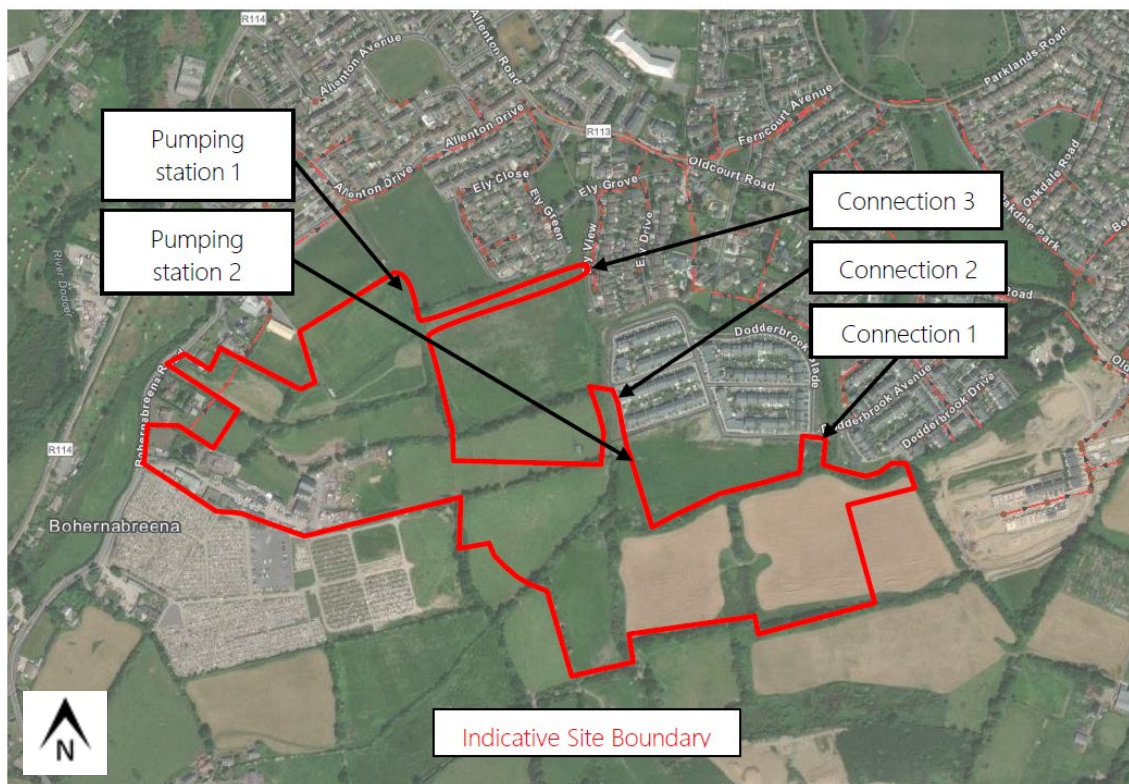


Fig. 43 - Indicative foul water connection points

The two temporary foul water pumping stations are designed such that the associated holding tanks allow for the onsite effluent to be pumped at off peak times, reducing the pressure on the downstream public foul network. The gravity network before and after the pumping stations are designed such that the pumping stations can be taken offline should the downstream public network constraints be resolved. Both pumping stations shall discharge into the existing foul water gravity networks located to the north of the subject site.

The pumping stations shall be designed in detail, should they still be required, at connection application stage and shall be fully compliant with Uisce Éireann (Irish Water) COP Part 5.

The proposed foul drainage network comprises of a series of 150/225mm diameter pipes, discharging to the pumping stations and gravity outfall described above. Each residential unit is serviced by individual 100mm diameter connections in accordance with Irish Waters Code of Practice for Wastewater.

9.2 Water Supply

The Uisce Éireann confirmation of feasibility COF (ref CDS23009245), as found in Appendix A of the submitted Engineering Services Report Part 2 prepared by Pinnacle Consulting Engineers, stated that water connection is feasible with conditions, summary of which is extracted below for ease of reference.

“Water Connection - Feasible Subject to upgrades

- Primary connection should be from the East of the Development to the future 150mm ID provided by adjacent development. The proposed main must be constructed, connected to Uisce Éireann infrastructure and in function, prior the connection.

- Secondary connection should be from the West of the Development, to the existing 4"uPVC distribution main. The connection should be closed during normal operations and open at time of emergency.

- The proposed 150mm spine main is to be connected to Uisce Éireann infrastructure on either way.

- If the connection from the West is made primary, the 4" main has to be upgraded to 150mm pipe for approximately 300m. The upgrade will be funded by the Developer and the fee will be calculated at a connection application stage. The 4" main has capacity to supply only 50 no. houses and any demand above would require the upgrade.”

It is proposed that the proposed development has 2 water supply connections, refer to Figure 6-2. The two connections will be on either end, east and west, of a proposed Ø150mm spine watermain. Several 100mm diameter looped networks shall supply water to the surrounding proposed residential units off of the 150mm spine main. The units immediately adjacent to the proposed 150mm spine main shall connect to the 150mm pipeline.

The COF connection conditions states that the western 150mm water connection requires an upgrade of the existing 100mm water main where use exceeds 50 no. houses) located in Bohernabreena Road. The upgrade shall consist of a new 150mm watermain, replacing the existing 100mm watermain from the western site connection northwards, terminating at the St Annes WPS. The upgrade shall be funded by the developer and shall be constructed as part of the proposed development. Further discussion, details of the connection and construction timelines of the required upgrade shall be agreed upon with Irish Water/Uisce Éireann, post receipt of a grant of planning, during the connection application stage.

There are two existing watermains, a Ø375mm Cast Iron Pipe and a Ø475mm cast iron pipe, crossing the site in an east-west direction. It is proposed that these two existing pipes shall be diverted and located within a dedicated roadside servitude along the cycle track and footpath of the central east-west spine road of the proposed development.

Confirmation of Feasibility (COF) was received on 5th January 2024 for the Irish Water diversion application DIV23291, as indicated in Appendix B of the submitted Engineering Services Report Part 2 prepared by Pinnacle Consulting Engineers, and extracted below for ease of reference. Preliminary discussions have been had with the DCC drainage department and final conditions from Uisce Éireann (Irish Water) and DCC shall be included in the planning submission.

COF: “Based upon the details you have provided with your enquiry and as assessed by Irish Water, we wish to advise you that, subject to valid agreement/s being put in place, the proposed diversion can be facilitated.”



Surface Water

The Surface Water Drainage design and SuDS Assessment carried out for the subject site have been undertaken in compliance with the requirements of the SDCC County Development Plan, the guidelines set by the Greater Dublin Strategic Drainage Study (GDSDS), the CIRIA SuDS Guideline and the Sustainable Drainage Explanatory Design & Evaluation Guide 2022.

The 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.

Due to the steep nature of the site, 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.

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.

In order to maintain the functioning of the existing agricultural ditches, several road-crossing culverts have been designed in line with the Office of Public Works (OPW) requirements and the Arterial Drainage Act 1945. During detailed design, post-planning, the necessary Section 50 application shall be made for each of the proposed culverts prior to commencement of the development.

In line with the ecologists' requirements and in line with NRA "Guidelines for the Crossing for Watercourses During National Road Scheme", selected crossings have been provided at several of the major road crossing culverts coinciding with existing hedges, including provision for safe animal crossing. Refer to the enclosed Pinnacle Consulting Engineers drawing no.s:

- P211102-PIN-XX-XX-DR-C-01000-S2 Stormwater Culvert Overall Layout
- P211102-PIN-XX-XX-DR-C-01001-S2 to P211102-PIN-XX-XX-DR-C-01008-S2 Stormwater Culvert Details

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.

Due to the steep nature of the site, 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. 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, reducing the risk of overland flooding.

The proposed SuDS interventions have been implemented to ensure runoff is treated to the standards outlined in the Greater Dublin Strategic Drainage Study and to add bio-diversity value, improving the aesthetic design of the development.

No underground attenuation tanks are proposed as part of the surface water drainage design with natural features proposed which have been fully coordinated with the proposed landscape design.

The proposed SuDS measures selected incorporated in the design for the proposed site are:

- Green roofs
- Permeable paving
- Swales
- Land/filter drains
- Bio-retention Tree pits
- Bio-retention Rain gardens
- Attenuation/Detention basins
- Petrol/Hydrocarbon separators
- Flow control devices

A site-specific SuDS Maintenance Manual is also enclosed as a separate document.

9.2 Flood Risk

A Site-Specific Flood Risk Assessment (hereafter "SSFRA") has been undertaken by Kilgallen & Partners, and is enclosed – please refer to the SSFRA for specific details of the flood risk assessment undertaken. The following is a synopsis of same only – for full details please refer to the submitted SSFRA.

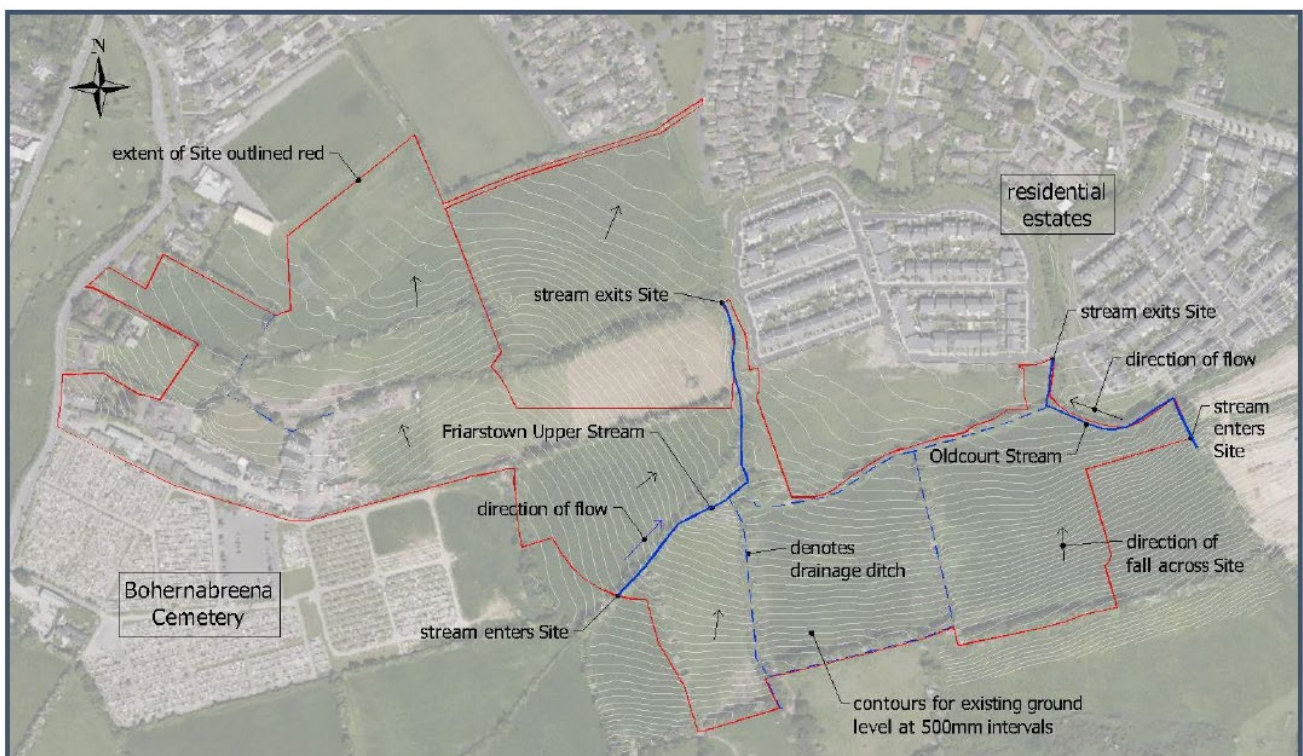


Fig. 44 - Copy of Figure 3.1 Existing Site taken from enclosed SSFRA by Kilgallen & Partners

Kilgallen & Partners carried out a site walkover to allow a direct inspection of drainage features. They assert that fluvial drainage features are consistent with those shown on OS mapping, suggesting there have been no significant changes to the drainage regime in recent times. The channels of both streams vary considerably as they flow through the site; being shallow and ill-defined at some locations and relatively deep and well-defined at others. Field culverts appear undersized and in many cases are in poor repair. Both streams include heavy vegetation. Flows were low in both streams. Many of the field boundaries have drainage ditches which connect to the streams.

The condition of the streams observed during the Site walkover suggests the channels might not have sufficient hydraulic capacity to convey larger flows that that would occur during extreme rainfall events, leading to overtopping at locations where the channels are poorly defined, inadequately culverted or heavily vegetated.

The steep gradient through the Site eliminates the potential for floodplain storage within the Site; instead, overtopping water will continue downstream as overland flow before merging into the streams at a lower point. The result is that during extreme events, the lands adjoining the streams act as overflow channels. The risk from overtopping flow can be mitigated by maintaining the existing stream channels and, where these are of inadequate capacity, raising the ground adjoining the channel locally to provide the additional hydraulic capacity.

Accordingly, mitigation measures are set out in the enclosed SSFRA, including channel cross-sections required to convey these flows (refer to Figures 4.4 & 4.5 of the enclosed SSFRA).

The proposed development includes the installation of culverts on both streams and on several drainage ditches. The locations of these are shown in Figure 4.7 in the enclosed SSFRA. Kilgallen & Partners assert that each culvert has been assessed and is of sufficient hydraulic capacity to convey peak flows, and calculations relating to same are provided in Appendix B of the enclosed SSFRA.

The SSFRA states that subject to the implementation of the mitigation measures described in the SSFRA, the development will not be at risk from fluvial flooding and will not increase fluvial flood risk elsewhere. Accordingly, the proposed development is considered appropriate from the fluvial flood-risk perspective.

The SSFRA asserts that there are no indicators of groundwater flood risk were observed during the site walkover, and therefore, detailed assessment of flood risk from this mechanism is not required.

In relation to pluvial flood risk, the enclosed SSFRA asserts that the site is on steeply sloping ground and is vulnerable to overland flow entering the site from the higher ground to the south. No drainage pipes entering were observed. Due to the steeply sloping ground on the subject site, this will encourage higher rates of overland flow; there is a risk of overland flow entering the site from higher ground to the south. Accordingly, the submitted SSFRA sets out appropriate measures to be incorporated into the proposed development to mitigate pluvial flood risk (refer to section 6.3 of the enclosed SSFRA). The SSFRA asserts that subject to the implementation of the mitigation measures described above, the development will not be at risk from pluvial flooding and will not increase pluvial flood risk elsewhere. Accordingly, detailed assessment is not required.

The SSFA has also considered the effects of climate change (refer to section 7.1) and refer to the measures to ensure the stream channels are each of sufficient capacity to convey peak fluvial flows. The performances of these channels were analysed for peak flows in the 1% AEP scenario based on a 30% climate change factor. These analyses found that even in the High-



End Future Scenario (HEFS), each channel has sufficient capacity to convey peak flows. The SSFRA describes the assessment of the various culverts proposed in the development (section 4.5). The enclosed SFRA asserts that the performances of these culverts were also analysed for peak flows in the 1% AEP scenario based on a 30% climate change factor. These analyses found that even in the HEFS, each has sufficient capacity to convey peak flows.

The SSFRA states that because of its steeply sloping terrain, the site will not be at risk of flooding even in the event of flow in the watercourse downstream becoming obstructed during a significant rainfall event (for example if a culvert downstream of the site became blocked). In such a scenario, water would overtop the channel and continue downstream and would not surcharge onto the proposed development.

The SSFRA also asserts that the surface water drainage system has been designed to capture, store and discharge surface water run-off from rainfall events for all return periods up to and including 100 years (with an allowance for climate change). Notwithstanding this, a blockage could occur in the surface water drainage system, leading to the risk of water rising in upstream manholes to the point where the manhole overtops and water overflows on to the surrounding ground. The proposed development provides routes for the conveyance of such overflows which ensure that buildings would not be at risk of flooding in this scenario.

The proposed development was subject to and passed the Development Management Justification Test (refer to section 8) and the SSFRA concludes that *“the proposed development is not at risk of flooding and will not increase flood risk elsewhere. The proposed development is therefore appropriate from a flood risk perspective”*.

10.0 Phasing

10.1 It is likely that the proposed development will be completed over six phases, the details of which are as follows:

Phase 1: will commence at the south-eastern end of the application site, in Neighbourhood Zone 1, delivering:

- (i) Part of the east-west link road, continuing on from what is currently under construction to the immediate east at Ballycullen Gate,
- (ii) associated public open space, including the construction of "Oldcourt Park",
- (iii) and approximately 94 no. dwellings.

Note: the proposed 94 no. dwellings to be delivered in Phase 1 are comprised of:

- 2 no. A type duplex blocks – 24 no. 2 & 3 bed duplex units,
- 2 no. B type duplex blocks – 32 no. 2 & 3 bed duplex units,
- 8 x A type 4 bedroom houses,
- 12 x B type 4 bedroom houses,
- 18 x C type 3 bedroom houses,
- Total = 94 no. dwellings.

Unit Type	2 bed	3 bed	4 bed	Total
No. of Units	28	46	20	94

Table 39: Proposed Dwelling Mix to be delivered in Phase 1

Phase 2: will consist of the completion of Neighbourhood Zone 1, to the immediate west of Phase 1, delivering:

- (i) Continuation of the east-west link road, continuing on from what is currently under construction to the immediate east at Ballycullen Gate,
- (ii) associated public open space, including completion of "Oldcourt Park" and opening of same to the public;
- (iii) delivery of proposed pedestrian and cycle links from Neighbourhood Zone 1 to Dodderbrook to the north (at Dodderbrook Avenue),
- (iv) and approximately 62 no. dwellings.

Note: the proposed 62 no. dwellings to be delivered in Phase 2 are comprised of:

- 1 no. A type duplex block – 12 no. 2 & 3 bed duplex units,
- 3 x A type 4 bedroom houses,
- 11 x B type 4 bedroom houses,
- 32 x C type 3 bedroom houses,
- 4 x G type 3 bedroom houses
- Total = 62 no. dwellings.

Unit Type	2 bed	3 bed	4 bed	Total
No. of Units	6	42	46	62

Table 40: Proposed Dwelling Mix to be delivered in Phase 2

Phase 3: will be in the north-western part of the site, in the western part of Neighbourhood Zone 3 and will deliver:

- (i) Northern most access off the Bohernabreena Road and part of east-west link road,
- (ii) Crèche,
- (iii) associated public open space;
- (iv) associated infrastructural services including drainage outfalls through third party lands (upon agreement),
- (v) and approximately 86 no. dwellings

Note: the proposed 86 no. dwellings to be delivered in Phase 3 are comprised of:

- 3 no. E type duplex blocks – 30 no. 2 & 3 bed duplex units,
- 28 x Urban Duplex Units – 28 no. 1, 2 & 3 bed duplex units
- 16 x C type 3 bedroom houses,
- 11 x D type 2 bedroom houses
- 1 x F type 3 bedroom house
- Total = 86 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	10	30	46	86

Table 41: Proposed Dwelling Mix to be delivered in Phase 3

Phase 4: will be in the north-western part of the site, consisting of the completion of Neighbourhood Zone 3 and commencement of Neighbourhood Zone 4, and will deliver:

- (i) Continuation of the northern most access off the Bohernabreena Road and part of east-west link road,
- (ii) associated public open space;
- (iii) and approximately 112 no. dwellings

Note: the proposed 112 no. dwellings to be delivered in Phase 4 are comprised of:

- Apartment Block D – 9 no. 1 & 2 bed units
- 1 no. C type duplex block – 12 no. 2 & 3 bed duplex units,
- 1 no. D type duplex block – 16 no. 2 & 3 bed duplex units,
- 14 x Urban Duplex Units – 14 no. 1, 2 & 3 bed duplex units
- 36 x C type 3 bedroom houses,
- 24 x D type 2 bedroom houses
- 1 x E5 type 3 bedroom house
- Total = 112 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	10	44	58	112

Table 42: Proposed Dwelling Mix to be delivered in Phase 4

Phase 5: will be in the centre of the site, in Neighbourhood Zone 2 and will deliver:

- (i) Central piece of east-west link road, thus completing same,
- (ii) associated public open space,
- (iii) vehicular, cycle and pedestrian links from Neighbourhood Zone 2 to Dodderbrook to the north
(at Dodderbrook Place),
- (iv) and approximately 101 no. dwellings.

Note: the proposed 101 no. dwellings to be delivered in Phase 5 are comprised of:

- 16 x Urban Duplex Units – 16 no. 1 & 3 bed duplex units,
- 26 x C type 3 bedroom houses,
- 6 x D type 2 bedroom houses,
- Apartment Block A – 9 no. units 1, 2 & 3 bed units,
- 2 no. Apartment Blocks B1 – 14 no. units 1 & 2 bed units,
- Apartment Block B2 – 7 no. units 1, 2 & 3 bed units,
- Apartment Block C – 23 no. units 1 & 2 bed units,
- Total = 101 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	27	37	37	101

Table 43: Proposed Dwelling Mix to be delivered in Phase 5

Phase 6: will be the final phase, in the western part of the site, adjacent to Phase 4 and completing Neighbourhood Zone 4, and will deliver:

- (i) The southern most access off the Bohernabreena Road,
- (ii) associated public open space,
- (iii) and approximately 68 no. dwellings

Note: the proposed 68 no. dwellings to be delivered in Phase 6 are comprised of:

- 1 no. D type duplex block – 16 no. 2 & 3 bed duplex units,
- 6 x Urban Duplex Units – 6 no. 1 & 3 bed duplex units
- 25 x C type 3 bedroom houses,
- 20 x D type 2 bedroom houses
- 1 x E5 type 3 bedroom house
- Total = 68 no. dwellings.

Unit Type	1 bed	2 bed	3 bed	Total
No. of Units	3	28	37	68

Table 44: Proposed Dwelling Mix to be delivered in Phase 6

Please refer to the submitted drawing no. MP12 "Proposed Phasing Plan" which illustrates the phasing of the overall development, with an extract of same shown in Fig. 45 overleaf.

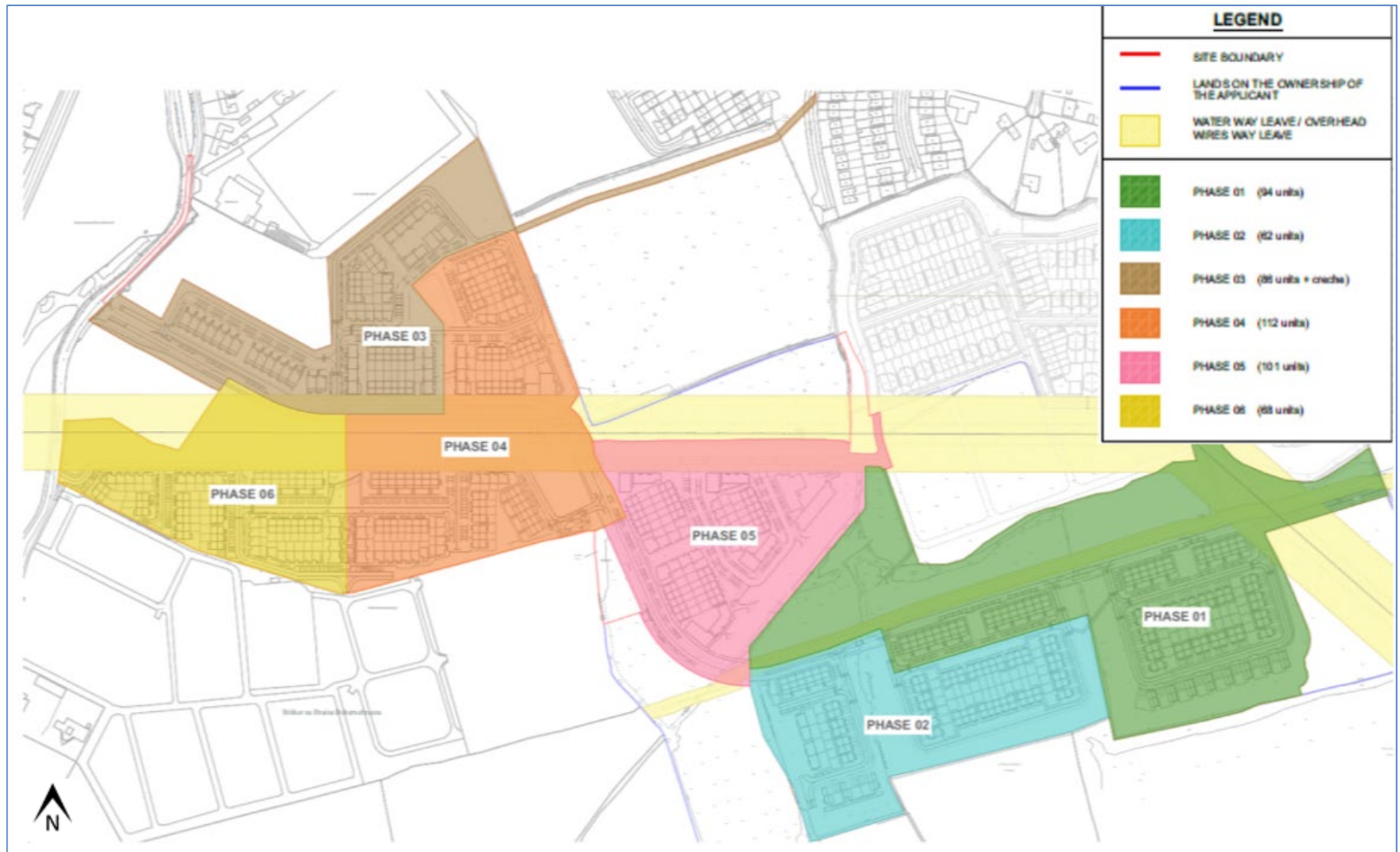


Fig. 45 - Phasing of overall lands

10.2 Compliance with LAP Phasing Requirements

We are cognizant of the requirements and objectives of the Ballycullen – Oldcourt LAP, to which the proposed development site is subject to. Section 6.3 of the LAP states that: *“For the purpose of the Phasing Strategy, the Plan Lands are divided into the east and west using the Ballycullen Road as the point of division. The strategies for each of the two areas comprise three phases. Each phase specifies a quantum of residential development and prescribed key pieces of physical and social infrastructure including community facilities that must be provided prior to the next phase of development. This will help to ensure that key pieces of infrastructure are delivered in a sequential manner as development progresses”*.

This site represents a significant phase of development on the western part of the LAP lands, an area that has been undeveloped for many years. In accordance with the phasing strategy of the LAP and presuming that the existing overhead electricity wires will be relocated at some future stage, the proposed development of 523 no. dwellings will achieve objectives of the of the LAP.

Taking into consideration that the existing overhead power lines have not been relocated, the phasing strategy for the western side of the Plan lands (Table 6.3.2) provides for Phase 1 of 150 dwellings and Phase 2 of 220 dwellings. To date, on the western side of the Plan lands, permission has been granted by the Planning Authority for 510 no. dwellings (under Ref.s SD14A/0180, SD15A/0150, SD17A/0121, SD17A/0468, SD18A/0025, SD19A/0104, SD22A/0356 & SD23A/0083). Taking the aforementioned into consideration, the current proposal for 523 no. dwellings will form part of Phase 3 of the Ballycullen – Oldcourt LAP.

Amendment No. 1 of the Ballycullen – Oldcourt LAP which came into effect from June 2017 which requires the following **Phase 1** requirements:

- Commencement of works on Gunny Hill playing pitches including access – permission for same has been granted under Ref.s SD16A/0059 and PL06S.247693, and the pitch, located between Oldcourt Lane and Gunny Hill, has been delivered by the applicant.
- 1 x NEAP on western side of Plan Lands – the current LRD proposal provides for the main play area within the proposed “Oldcourt Park”, and the delivery of the NEAP.
- Site made available for the construction of a Primary School on the eastern side of the Plan lands or a Primary School and/or Post-Primary School on the western side of the Plan Lands – permission was granted under Ref.s SD21A/0137 & / ABP-311141-21 for a temporary two storey post-primary school [Firhouse Educate Together Secondary School]. In addition, permission for a new educational campus was granted on 29th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref.s SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School and is considered to be compliant with this Phase 2 requirement. This is located to the east of the subject site, adjacent to Ballycullen Green and the Gunny Hill playing pitch.
- Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies - we note conditions attached to permissions on the Plan lands requiring of construction phasing programmes to be notified to the Planning Authority.

Phase 2 requirements as set out in the LAP are:

- Completion of Gunny Hill playing pitches including access - permission for same has been granted under Ref.s SD16A/0059 and PL06S.247693, and the pitch, located between Oldcourt Lane and Gunny Hill, has been delivered by the applicant.
- Site made available for the construction of a Primary School on the eastern side of the Plan lands or a Primary School and/or Post-Primary School on the western side of the Plan Lands - permission was granted under Ref.s SD21A/0137 & / ABP-311141-21 for a temporary two storey post-primary school [Firhouse Educate Together Secondary School]. In addition, permission for a new educational campus was granted on 29th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates, elements of the temporary two storey post-primary school development permitted under Ref.s SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School and is considered to be compliant with this Phase 2 requirement. This is located to the east of the subject site, adjacent to Ballycullen Green and the Gunny Hill playing pitch.
- Commencement of landscaping of Oldcourt Park with access and 1 additional NEAP for western side of Plan Lands - the proposed development includes for the delivery of Oldcourt Park and the delivery of the NEAP. Landscaping and play equipment details for the proposed development have been prepared by Gannon + Associates and we refer the reader to same for details. The proposed development is therefore considered to be compliant with this Phase 2 requirement.
- The provision of a minimum of 300 sq.m. of community floorspace – we note this requirement of the LAP, however, having had recent discussions with the Planning Authority, we have been made aware that such a community facility is not required by on the western part of the Plan lands. Instead, it has been agreed in principle that the applicant will pay a financial contribution in lieu of the provision of community floorspace upon a grant of permission for the subject LRD proposal, as detailed in the foregoing section 7.14 of this Planning Statement.
- Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies - we note conditions attached to permissions on the Plan lands requiring of construction phasing programmes to be notified to the Planning Authority.

Phase 3 requirements as set out in the LAP are:

- Completion of Oldcourt Park – the proposed development will deliver and complete Oldcourt Park in its entirety, commencing construction of same as part of Phase 1 of the proposed development and completing it in Phase 2.
- Commencement of planning process for the provision of a school on the designated Primary School site on the eastern side of the Plan Lands OR on the designated Primary School site and/or Post-Primary School site on the western side of the Plan Lands - permission was granted under Ref.s SD21A/0137 & / ABP-311141-21 for a temporary two storey post-primary school [Firhouse Educate Together Secondary School]. In addition, permission for a new educational campus was granted on 29th April 2024, under Planning Ref. SD23A/0149. This permitted development includes for, and permanently incorporates,



elements of the temporary two storey post-primary school development permitted under Ref.s SD21A/0137 / ABP-311141-21. It provides for a 1,000 pupil Post Primary School (Firhouse Educate Together Secondary School and is considered to be compliant with this Phase 2 requirement. This is located to the east of the subject site, adjacent to Ballycullen Green and the Gunny Hill playing pitch.

- Demonstrate compliance with the provision of road improvements and traffic requirements as per the Local Area Plan Accessibility and Movement Strategy and all other relevant traffic related plans, guidelines and studies - we note conditions attached to permissions on the Plan lands requiring of construction phasing programmes to be notified to the Planning Authority - we note conditions attached to permissions on the Plan lands requiring of construction phasing programmes to be notified to the Planning Authority.

Taking into consideration the phasing requirements of the LAP and the key requirements that have been / can be delivered to date, it is considered that the proposed development will complete the delivery of the phasing requirements of the LAP and/or has demonstrated how other required items can be/have been delivered to date.

Taking all of the foregoing into account, it is considered that the relevant phasing requirements of the LAP have been and can be met and therefore the proposed development ought to be granted permission accordingly.

In addition to the proposed development's compliance with the phasing requirements of the Ballycullen-Oldcourt LAP, the proposed development will be carried out in a phased basis to ensure the delivery of housing will occur in tandem with the necessary physical and social infrastructure and this is illustrated on the enclosed drawing no. MP12 "Proposed Phasing Plan".

Details of compliance of the proposed development with the phasing requirements of the LAP are set out in section 7.2 (page 201) of the submitted Statement of Consistency – please refer to same.

11.0. Conclusion

- 11.1** Capami Ltd. wishes to apply to South Dublin County Council for permission for a Large-scale Residential Development (LRD) on a site located in the townlands of Bohernabreena, Oldcourt and Killinenny, Dublin 24.
- 11.2** The proposed development falls under the definition of Large-scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 as it consists of *“the development 100 or more houses”* the floor space of which *“is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development”*.
- 11.3** The residential element of the proposed development consists of 523 no. dwellings comprised of 255 no. 2, 3 & 4 bed, 2 & 3 storey, detached, semi-detached and terraced houses, 206 no. 1, 2 & 3 bed duplex units in 20 no. 2 & 3 storey blocks, and 62 no. 1, 2 & 3 bed apartments in 7 no. 2-3 & 3-4 storey blocks (i.e. Blocks A, B2 & D, and 2 no. Blocks B1 & 2 no. Blocks C), along with a 2 storey childcare facility of c. 457sq.m.
- 11.4** The proposed development is put forward in compliance with the Res-N, RES and OS land use zoning objectives attached to the site, under the South Dublin County Development Plan, 2022-2028.
- 11.5** All of the proposed dwellings are put forward in compliance with the floor areas standards for
- (i)** new housing, as per the 2007 Quality Housing for Sustainable Communities Guidelines, and
 - (ii)** apartment developments as per the SPPRs of the 2023 Sustainable Urban Housing: Design Standards for New Apartments ensuring a high-quality development and standard of living for future residents.

Furthermore, the proposed development accords with new guidance set out in the recently published “Sustainable Residential Development and Compact Settlements Guidelines” (DHLGH, 2024). The proposed development achieves a net density of c.42 units per hectare in accordance with the aforementioned new guidelines.

- 11.6** Careful consideration has been given to the design of the proposed development to ensure integration with its environs, which is evident by the scale and building heights proposed, and the plethora of linkages to adjoining lands. The proposed site layout plan is also based upon the principles of DMURS and good urban design principles.
- 11.7** The enclosed Architectural Design Statement clearly demonstrates how the key criteria such as context, connections, inclusivity, variety and distinctiveness are catered for in the proposed development. It is also evident from the submitted Landscape Design Rationale and drawings, that the design aims to create a seamless and intuitive environment, allowing visitors to explore the landscape effortlessly. Within the design, pocket parks are strategically incorporated, including areas for play, fitness, seating, and amphitheatre-style gatherings. Judicious consideration has been paid to the preservation of existing vegetation and creating spaces that promote and support local fauna. The landscape design has incorporated SUDS proposals and enhances the green infrastructure network of the area.

- 11.8** There is a good mix of dwelling types, building height, variation in design and character areas, with four distinct Neighbourhood Zones created, to establish a sense of place throughout the scheme. Good street frontage is proposed so as to create a strong urban edge along same. The enclosed landscaping details clearly demonstrate how the topography of the site is to be handled in an appropriate and soft manner.
- 11.9** The site layout plan provides for the c.36% public open space provision in a variety of formats and recreational functions, including the delivery of "Oldcourt Park" (c.2.3Ha). All open spaces will be passively overlooked, cater for a range of recreation types and pedestrian and cyclist connectivity, along with linkages to adjoining lands. A very clear green infrastructure strategy is applied to the proposed development, as per the enclosed Landscape Design Rationale. A significant proportion of the existing hedgerows are to be retained, and have been incorporated into the site layout plan whilst, also adding to place making / neighbourhood zones within the scheme.
- 11.10** It is considered that the subject proposal for a proposed Large-scale Residential Development represents proper planning and sustainable development of the subject site and supports the objectives national, regional and local planning policy.
- 11.11** The purpose of this Planning Statement is to provide details of the development proposal and is accompanied by a suite of other reports such as a Statement of Consistency, EIAR etc. and we refer the reader to all of the submitted drawings and documentation in their assessment of this proposed LRD. Based upon feedback already received from SDCC, at both the S.247 pre-planning consultation and Stage 2 LRD meeting, as well as the information set out in the SDCC LRD Opinion, Ref. LRDOP001/24, dated 28th March 2024, the current proposal has evolved and is now put forward for permission.
- 11.12** Having regard to the policies and objectives in the 2022-2028 South Dublin County Development Plan, along with guidance set out in the following:
- Housing for All – a New Housing Plan for Ireland, 2021;
 - the National Planning Framework (2018);
 - the Design Manual for Urban Roads and Streets (DMURS) (2019);
 - the Sustainable Urban Housing: Design Standards for New Apartments, (2023);
 - the Urban Development and Building Heights Guidelines for Planning Authorities (2018);
 - the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, (2024),
 - the nature, scale and design of the proposed development and the availability in the area of a wide range of social, transport and water services infrastructure, and;
 - the pattern of existing and permitted development in the area,

it is respectfully put forward that the proposed development constitutes an acceptable quantum and density of development in this location, will not seriously injure the residential or visual amenities of the area, is acceptable in terms of urban design, height and quantum of development and is acceptable in terms of traffic and pedestrian safety. Taking all of the foregoing set out in this Planning Report and as supported by all of the documentation and drawings submitted as part of this LRD application for permission, we consider that the proposed development is in accordance with the proper planning and sustainable development of the area. We therefore respectfully request that the permission being sought be granted, subject to whatever the Planning Authority considers appropriate.



Yours sincerely,

Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Chartered Town Planner
Armstrong Fenton Associates.



Appendix A

Copy of LRD “Stage 1” Pre-Application Consultation Minutes

SOUTH DUBLIN COUNTY COUNCIL PLANNING DEPARTMENT PRE-APPLICATION CONSULTATION REPORT FORM			
Pre-Planning Ref. No. LRDP010/23	ADVICE WITHOUT PREJUDICE		Please note that advice or opinions offered at consultations is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act
CONSULTATION:	Meeting	Email	
30/06/2023	X		
Full address of subject site	Bohernabreena & Oldcourt, Dublin 24		
Name/s of Applicant/s and/or Agents	Applicant: Capami Ltd		
Contact Details	Agent: Tracy Armstrong, Armstrong Fenton Associates		

DESCRIPTION OF PROPOSAL
c. 530 no. residential units

ZONING: The site is zoned Zoning Objective ‘RES-N’: <i>‘To provide for new residential communities in accordance with approved area plans’</i>	
LAND USE MATRIX: Residential development is permitted in principle under this zoning objective.	
Relevant Planning History	<ul style="list-style-type: none"> • SD14A/0180 – Permission granted (135 no. dwellings & creche) • SD15A/0150 (amended SD18A/0025) – Permission granted (74 no. dwellings) • SD16A/0059 – Permission granted (playing pitch) • SD17A/0041 – Permission granted (link road) • SD17A/0121 – Permission granted (133 no. dwellings & creche) • SD17A/0468 – Permission granted (64 no. dwellings) / amended by SD22A/0356 (increase to 71 no. dwellings) • SD19A/0104 – Permission granted (21 no. dwellings) • SD23A/0083 – Awaiting decision (71 no. dwellings)

FEEDBACK/OBSERVATIONS OF PROPOSAL	
Comment where relevant:	Proposal (as presented): <ul style="list-style-type: none"> • On site on the western lands of the LAP since 2015 <ul style="list-style-type: none"> ○ To date 4 schemes permitted and started ○ C.340 units complete ○ Remaining lands form part of the LRD proposal ○ Strategy to go forward with LRD on majority of the lands, c.540 units. ○ Seeking to move the overhead lines – 2 options in LAP, seeking a third option with the ESB to move lines further from the development lands.

	<ul style="list-style-type: none"> ○ Potential SID app to move the overhead lands, if successful, second LRD to be sought on remaining lands. If not successful, smaller s.34 likely on remaining lands. ○ Own and control majority of the lands, one third party happy to act on their behalf. ○ Made available school site, department in process of lodging app for permanent school ○ Playing field delivered, built and in operation ○ 2 creches delivered in Dodderbrook ○ Oldcourt park looking to be addressed as part of application as well as community facilities ● Want to complete development of the western lands. Current approach most efficient to achieve this goal ● Scheme based on principles, policies and objectives of the LAP. ● Acknowledge extant permission for main link street, permission due to expire 2023. Not intention to seek duration, more pragmatic to include new main link street as part of LRD application. ● Discussions with SDCC, understand to seek financial contribution rather than a built facility – no community facilities proposed as part of LRD on this basis. ● LRD can satisfy phasing requirements of LAP – Oldcourt park (2.3 ha) to be provided. ● Housing typologies majority housing ● Majority of lands mid-slope – 2 storey terraced / semi-detached housing ● Upper slope lands – single storey detached housing in accordance with LAP ● 3-storey duplexes proposed along the link street to create a strong urban edge ● 3-storey apartment buildings, possible own door units, to provide definition/urban design compact form at junctions – 4 proposed ● 238 houses, 204 duplexes & 88 apartments ● 4 character areas ● Hedgerows significant part of historic landscape character and future development of the site – consist of various native species considered in the design proposal. <p>Key considerations:</p> <ul style="list-style-type: none"> ● LAP due to expire September 2024 – extension of the LAP currently being challenged as not subject to SEA. Planning context could change depending on that outcome. Could be prudent to increase density to 30 dph to comply with 2009 Resi Guidelines. ● Community centre – looking for a financial contribution as looking to extend the Park Community Centre. Would look to tie application to a financial contribution. ● JR in relation to hedgerows in Rathcoole – emphasising importance of hedgerows ● Strategic overview – how does it fit into the wider area, red & blue line don't correlate. Masterplan as part of application to show lands beyond the red line boundary. Indicate how current proposal would fit into future development. Potential issues of connecting future development, permeability & open space etc... ● Welcome downgrading of the road from distributor road to a more people friendly road.
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	<ul style="list-style-type: none"> • Financial contribution in relation to community centre – calculation and breakdown of figure to be provided • Timeline of the SID – layout dependent on that application? <ul style="list-style-type: none"> ○ Condition that some or all of development may not go ahead without SID decision? ○ TA: layout for LRD wouldn't be affected by removal of the wires, 3 plots excluded that would be future applications once the SID has been resolved. ○ JJ: 2 scenarios within masterplan, layout under current arrangements with no movement of pylons, 1 with the pylons removed. Ideally would see both. ○ MW: strategy has flexibility for either outcome. Masterplan for potentially another 160/170 units if lines moved, smaller pockets remain to accommodate approx. 80 units. ○ JJ: want to see how lands outside the current development would fit in with the lands in either scenario ○ JJ: pylons to be underground or overground? ○ MW: overground – wayleave dependent, roughly 20m both sides of centre. • POS calculation doesn't include land under pylons – confirmed. • Rerouting over current POS would exclude those lands per calculations. • Gradients important, gradients should be maintained in development rather than stepping arrangement. Gradient changed at Dodderbrook presents difficulties now with connectivity. Want to avoid similar happening again. Minimise/avoid the use of retaining walls and steep/abrupt level changes. • CGI's should provide overall picture, key to see how this fits into surrounding development. • Consider frost & snow and impact on surface of roads/footpaths. • applicant asked for increased heights and wants pockets of 4 storeys. As much as possible the height requirements in the LAP should be adhered to. Provide own door duplexes to increase density. LAP requirements incorporated into the Dev Plan so height strategy to be consistent with same. • TA: would seek to justify non-compliance with LAP on basis of compliance with Dev Plan <ul style="list-style-type: none"> ○ GOC: useful to have another 247 meeting before Stage 2 LRD meeting <p>Additional Departmental Advice:</p> <p><i>Parks</i></p> <ul style="list-style-type: none"> • Need for masterplan to see how areas tie in • Green infrastructure plan for the area • Looking to reduce fragmentation of hedgerows. Feature in the centre fragments all the hedgerow at an important point of the scheme. • Where is water moving on site to see how SuDS work. Drainage system to be above ground system, integrated into the landscape • Minimum 10m planted riparian corridor along watercourses • Rural fringe – how this affects movement of biodiversity, passes between back gardens etc... impact to existing ecology of the area important to see. • Street trees to be included, SuDS tree pits part of the street rather than in front gardens • Play provision • Tree protection measures to be included on landscape plans
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	<p><i>Roads</i></p> <ul style="list-style-type: none"> • More detail to be discussed with Pinnacle directly • Masterplan showing circulation routes throughout the site • More detail on connections to neighbouring developments • Terracing of the slope, steps to be avoided, ramping to be provided for universal access • Road safety audit required • Internal road layout – refer to LAP requirements, drawing showing road widths, tactile pavements, ped crossings • Autotrack analysis for emergency vehicles and bin lorries • No ransom strips – roads constructed to all site boundaries • Justification for parking rates & breakdown of on curtilage/on street parking • LAP doesn't allow perpendicular parking on local link streets for mid to upper slopes. Lots of perpendicular parking off the main link street, wouldn't be acceptable per LAP. Should be parallel depending on LAP status • 20% EV charging / 5% mobility parking • Bike parking required • Bin storage locations • SOR: been steered by LA in terms of road design/classification. <ul style="list-style-type: none"> ○ JMcG: to be looked at in more detail ○ SOR: is DMURS compliant ○ JMcG: few locations with perpendicular on both sides which wouldn't be DMURS compliant – should be avoided • Requirements for bus on main link street, turning points or connection to Bohernabreena. To be considered. <p><i>Housing</i></p> <ul style="list-style-type: none"> • 20% Part V proposal to be pepper potted around the site and should be reflective of the overall ratio of units on site • Date of purchase required to ascertain Part V liability <p><i>Drainage</i></p> <ul style="list-style-type: none"> • SuDS Guide to be referred to • Underground attenuation not acceptable unless exceptional circumstances – attenuation to be above ground • Carry out flow route analysis on the site • Setback distance to any watermains & minimum 10m from any stream • Minimise use of pipes, maximise use of above ground attenuation • Drawings showing attenuation proposal, capacity each SuDS system has • Confirmation of feasibility from Irish Water • Show on OPW flood maps <p>Please also see the link below to general pre planning guidance which covers a range of topics: https://www.sdcc.ie/en/services/planning/planning-applications/pre-planning-guidance-and-consultation/</p> <p><i>The carrying out of consultations in relation to any proposed development shall not prejudice the performance by the Planning Authority of any other of its functions under the Planning Acts, or any regulations made under the Planning</i></p>
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	<i>Acts and cannot be relied upon in the formal planning process or in legal proceedings.</i>
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Aoife O'Connor-Massingham
Acting Executive Planner

Attendees - SDCC

Jim Johnston – Planning
Aoife O'Connor-Massingham – Planning
Eoin Burke – Planning
Gormla O'Corrain – Planning
John McGee – Roads
Graham Murphy – Roads
Tony Mangan – Roads
Laurence Colleran – Public Realm
Oisín Egan – Public Realm
Asta Tamosaite – Housing
Debbie O'Dempsey – Housing
Brian Harkin – Water Services

Attendees – Applicant

Michael Whelan Jnr – Capami
Tracy Armstrong – Armstrong Fenton
Alan Fenton – Armstrong Fenton
Scott – Davey Smith
Niamh Lowney – Davey Smith
Shaun O'Reilly – Pinnacle
Jonathan Gannon – Gannon and Associates

APPENDIX B

Copy of LRD “Stage 2” Pre-Application Consultation Minutes

SOUTH DUBLIN COUNTY COUNCIL PLANNING DEPARTMENT PRE-APPLICATION CONSULTATION REPORT FORM			
Pre-Planning Ref. No. LRDP001/24	ADVICE WITHOUT PREJUDICE		Please note that advice or opinions offered at consultations is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act
CONSULTATION:	Meeting	Email	
01/03/2024	X		
Full address of subject site	The townlands of Bohernabreena & Oldcourt, Dublin 24		
Name/s of Applicant/s and/or Agents	Applicant: Capami Ltd		
Contact Details	Agent: Tracy Armstrong, Armstrong Fenton Associates		

DESCRIPTION OF PROPOSAL

522 no. residential units comprised of 272 no. two and three storey, detached, semi-detached, and terraced houses (53 no. two-bed, 180 no. three-bed, 5 no. two / three bed, and 34 no. four-bed units), 144 no. two and three bed apartment and duplex units in 10 no. three storey duplex blocks, 62 no. one and three bed apartment and duplex units in 31 no. three storey “E” type houses, and 44 no. apartments (8 no. one bed, 19 no. two bed, and 17 no. three bed units) in 7 no. two / three storey apartment blocks, along with a childcare facility of approximately 320 sq.m located on the ground floor of proposed apartment block C.

ZONING: The site is zoned Zoning Objective ‘RES-N’: *‘To provide for new residential communities in accordance with approved area plans’*

LAND USE MATRIX: Residential development is permitted in principle under this zoning objective.

Relevant Planning History

- SD14A/0180 – Permission granted (135 no. dwellings & creche)
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- SD19A/0104 – Permission granted (21 no. dwellings)
- SD23A/0083 – Permission granted (71 no. dwellings)

FEEDBACK/OBSERVATIONS OF PROPOSAL

<p>Comment where relevant:</p>	<p>Proposal (as presented):</p> <ul style="list-style-type: none"> • LRD residential development of 522 on western side of Ballycullen-Oldcourt plan lands. • Approx. 430 no. units delivered in area already. • Principal constraints of 2 wayleaves – proposal to allow for development with lines in place but allows for development of other lands if lines can be relocated. Positive discussions with ESB about relocation of the lines. Possible to divert once agreement from all landholders. Looking for definite route for realignment which is contingent on LRD decision. Corridor included to divert the lines up the mountain – LRD designed to fit both routes. Bigger pockets freed up for development if lines can be moved. • If lines to remain, sits for approx. 70 additional units, if lines moved land for approx. 140 more units. • Steepest portion of the site along the southern hedgerow to watermain wayleave. • Water wayleave broadly in alignment with route of link road. • 4 distinct neighbourhoods within the site. <ul style="list-style-type: none"> ○ Neighbourhood zone 1 seen as continuation of pattern of development from Ballycullen Gate and addresses contours – utilises current standards for development. ○ Neighbourhood zones 2, 3 and 4 designed with cognisance of new compact development guidelines. <p>Key considerations:</p> <ul style="list-style-type: none"> • St Anne's pitches – pitch to south of main pitch that would be developed, what's plan for lost football pitch? <ul style="list-style-type: none"> ○ Deal with St Anne's who have use of pitch while progressing planning, utilising pitch at Ballycullen Green. Proposal to swap the 2 pitches ultimately. No deficit for St Anne's, pitch bought off them is a training pitch. • Permeability within site and connecting to a through adjoining sites, reference to 'OS' lands to northeast. Opportunity should be taken to provide linkages. Potential future links tend not to get delivered, want links that would be implemented as part of permission. Links should be put in in tandem with pockets of development as they arise. <ul style="list-style-type: none"> ○ Outline plan has been done for how council owned lands can be accessed. Can include on masterplan. Plan for adjacent field to be included. ○ JJ: useful to see plans/intention for any lands adjoining • What is phasing intention of development? • Community centre – agreement in principle for contribution in lieu to be paid as part of development. Conditioned to pay remainder that will be clearly outlined in application. • EIAR required as in excess of 500 units. <ul style="list-style-type: none"> ○ TA: all sub-consultants appointed and surveys ongoing for several months. ○ JJ: potential area of archaeological significance, survey carried out but not followed through into the LAP. • GOC: figures for density with and without lines?
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- TA: density within red line gross 27 uph, net 42.5 uph – applied guidance in new guidelines for calculating density.
- GOC: is link street still a link street, removal of hedgerow are these strategic?
- GOC: compact settlement guidelines are operative, making decisions on that basis.
- JJ: provide multiple good quality CGI's

Additional Departmental Advice:

Parks

- Lack of street trees, front garden trees indicated but should include more street trees.
- Won't accept trees for taking in charge if not integral to the road rather than in between front driveways/gardens.
- Water should be treated in soft landscaping as close to where it falls as possible. Along roads should flow into swales/tree pits etc..
- Hedgerows, want to reduce fragmentation as much as possible – wherever hedgerow is broken, can this be mitigated elsewhere to keep corridors.
 - 1,333m of hedgerow to be retained.

Roads

- Cycle path along length of road, the zig-zag from south to north – can cycle lane remain on one side, considerations for location of car parking there.
 - Designed to align with existing corridor alongside the park,
 - Crossings would be toucan crossings to facilitate safe pedestrian/cycle movements.
- Cycle lane to be in keeping with cycle design manual.
 - Entrances requiring stepping back from the road.
- Visibility splays for junctions at east given proximity of 2 entrances from north and south onto road.
- Parking rates to be in keeping with Development Plan.
- In relation to street trees – vision lines to be considered.
- Bus stop locations to be determined in conversation with the NTA.
- RK: any feedback on secondary connection to Bohernabreena Road
 - JH: won't argue with tweaks if for ecological reasons. Buses to be able to negotiate bends. Concern regarding numbers coming out and should that be upgraded to signal, need to study, and will come back with response.
- RK: looking for feedback on TTA traffic counts etc....
- RK: 2 full links to Dodderbrook in accordance with LAP connectivity.

Drainage

- How do you propose to deal with surface water from adjacent sites upstream from proposed site? Will this be attenuated?
 - SOR: 2 main watercourses through development, don't intend to connect, culverts under main spine road as may be needed. Attenuation of streams won't be included in development lands.
 - BH: need to consider how existing surface water into lands is addressed.
 - SOR: looking at land drain connection or cut-off trench.
 - BH: must be attenuated to greenfield runoff rate and any interception must be a SuDS measure.

	<ul style="list-style-type: none"> • Has a flow route analysis been done for current natural flow of surface water on the site prior to development? <ul style="list-style-type: none"> ○ DS: Has been done – natural flow route down mountain along green links that have been allowed for. Issue at very north, attenuation allowed for to meet requirements. ○ SOR: existing developments accommodate water downhill also. Site specific flood risk assessment will be submitted for development also. • 10m setback to any watercourse • SDCC SuDS Guide • Setback distances to Irish Water • Attenuate water as close as possible to source. <p><i>Housing</i></p> <ul style="list-style-type: none"> • Part V provision – submit proof of date of land purchases to confirm Part V liability. • More houses to be included for Part V proposal. • To discuss offline. <p>Please also see the link below to general pre planning guidance which covers a range of topics: https://www.sdcc.ie/en/services/planning/planning-applications/pre-planning-guidance-and-consultation/</p> <p><i>The carrying out of consultations in relation to any proposed development shall not prejudice the performance by the Planning Authority of any other of its functions under the Planning Acts, or any regulations made under the Planning Acts and cannot be relied upon in the formal planning process or in legal proceedings.</i></p>
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Executive Planner

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Ciara Shevlin – Planning
Deirdre McGennis – Planning
John Hegarty – Roads
Nicky Cox – Roads
Laurence Colleran – Public Realm
Asta Tamosaite – Housing
Brian Harkin – Water Services

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Tracy Armstrong – Armstrong Fenton
Alison Nash – Armstrong Fenton
Greg Davey – Davey+Smith Architects
Andrea Maldonado – Davey+Smith Architects
Shaun O'Reilly – Pinnacle
Jason Burger – Pinnacle
Ronan Kearns – Pinnacle
Jonathan Gannon – Gannon and Associates

