



**THORNTON O'CONNOR**  
TOWN PLANNING

# **Statement of Response to LRD Opinion**

**Prepared in Respect of a Planning  
Application for a Large-Scale Residential  
Development at a Site in the Townlands  
of Glenamuck North, Kilternan, Dublin 18  
(Southern Site)**

**On Behalf of Durkan Glenamuck  
Developments Limited**

December 2025



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## 1.0 INTRODUCTION

On 15<sup>th</sup> April 2025, Thornton O'Connor Town Planning on behalf of Durkan Glenamuck Developments Limited submitted a pre-application LRD consultation request to Dún Laoghaire–Rathdown County Council. The purpose of this document is to provide a summary response to the specific information requested by Dún Laoghaire–Rathdown County Council in their Notice of LRD Opinion (Ref. PAC/LRD2/004/25) received on 3<sup>rd</sup> July 2025, further to a meeting held on 8<sup>th</sup> May 2025 with Dún Laoghaire–Rathdown County Council and the Applicant/Design Team.

The key issues /areas raised in the Opinion that must be addressed in any future application are provided in Section 2.0 & 3.0 below.

This Statement of Response has been drafted based on insights provided by the plans and particulars prepared by the Applicant and the wider Design Team. Therefore, this report must be read in tandem with these materials.

### 1.1 Summary of Development

The full description of the proposed development, as described in the Statutory Notices, is as follows:

*"Durkan Glenamuck Developments Limited intend to apply for permission for a Large-Scale Residential Development on a site measuring c. 3.27 Ha in the townland of Glenamuck North in Kilternan, Dublin 18. The site is generally bounded by: the recently constructed Glenamuck District Distributor Road to the north (to be known as the Kilternan Road); the under construction Glenamuck Link Distributor Road to the east (to be known as the Kilternan–Glenamuck Link Road); Glenamuck Manor and a residential dwelling (known as 'Westgate'), its associated outbuildings and wider land holding to the south; and a residential dwelling (known as 'Shaldon Grange') and its wider landholding located to the west.*

*Road works are proposed to the approved Glenamuck District Roads Scheme (ABP Ref. HAO6D.303945) to provide access to the development from the Kilternan Road. The Kilternan Road access point will include works, inclusive of any necessary tie-ins, to the footpath and cycle track to create a side road access junction incorporating the provision of uncontrolled pedestrian and cyclist crossing across the side road junction on a raised table. A surface water outfall pipe (225 mm) is also proposed to pass through land to the north of the site, including the future Kilternan Road. The total site area including the development site, road works and infrastructure works measures c. 3.32 Ha.*

*The development will principally consist of the construction of 135 No. residential units, comprising 65 No. houses (9 No. 2-bed units, 46 No. 3-bed units and 10 No. 4-bed units) and 70 No. duplex units (21 No. 1-bed units, 22 No. 2-bed units and 27 No. 3-bed units). The proposed development will principally range in height from 2 No. to 4 No. storeys.*

*The development also provides: car parking spaces; bicycle parking; bin storage; ancillary storage; private balconies, terraces and gardens; hard and soft landscaping; boundary treatments; lighting; substations; and all other associated site works above and below ground."*

## 2.0 RESPONSE TO THE DÚN LAOGHAIRE–RATHDOWN COUNTY COUNCIL OPINION

Items to be Addressed		Response
<b>Drainage</b>		
1.	<p><u>Presence of a drain which is subject to water flow:</u> The drain travelling through the central area of the site as well as to the southwest appears to be a significant feature within the site, with a depth of circa 2m along the majority of the route. While a 10m riparian strip has been provided over the element called up as Glenamuck Stream, the remainder of this feature has generally been built over. It is not clear from the drawings how the applicant plans on dealing with this feature and the potential issues that may arise if built over without consideration of the impacts to the proposed development. The applicant has referenced the SSFRA prepared for the GDRS project to indicate there is no flooding on site. It is noted in this report, this feature has been called up as a “Watercourse (local drainage)”. There is also another “drain” identified on the northeastern side of the site.</p> <p>The applicant will be requested to provide details of how they intend to accommodate the existing feature through the site, in line with council policies, while ensuring the proposed attenuation system does not get overwhelmed by additional surface water runoff from external locations</p>	<p>The drain in question was assessed and determined to be a continuation of a land drain constructed below the recently completed Glenamuck Manor housing scheme. It was noted to be a 225mm diameter plastic pipe and drains part of a private property upstream called “Shaldon Grange”. Discussions were held with the Water Services Department regarding this element and it was determined that to avoid any conflict with the proposed attenuation system, the existing drain would be diverted into a new 300mm diameter pipe that remains independent of the proposed attenuated system and this pipe will pass through the development to a new outfall into the Glenamuck Stream. Refer to Dwg.2411/101 for further detail.</p>
<b>Access and Connections</b>		
2.	<p><u>North–South and East–West Connections:</u> Transportation Planning consider that the quality of north-south and east-west connections across the site could be improved for pedestrians and cyclists, by way of allocation of space, the potential provision of segregated routes, more direct routes, improved wayfinding and pedestrian/cyclist priority across the site. The internal layout shall also be subject to a detailed independent quality audit to be undertaken and submitted as part of any future application at the site.</p>	<p>The proposed development will provide multiple north–south and east–west connections through the site and into existing and future developments and the local pedestrian and cycle network, as illustrated in Figure 2.1. The northern and eastern boundaries of the site will facilitate multiple access points along the GDDR and GLDR which will link into the site’s internal street network and further into Glenamuck Manor to the south and any future development of the remaining Shaldon Grange lands to the west.</p>

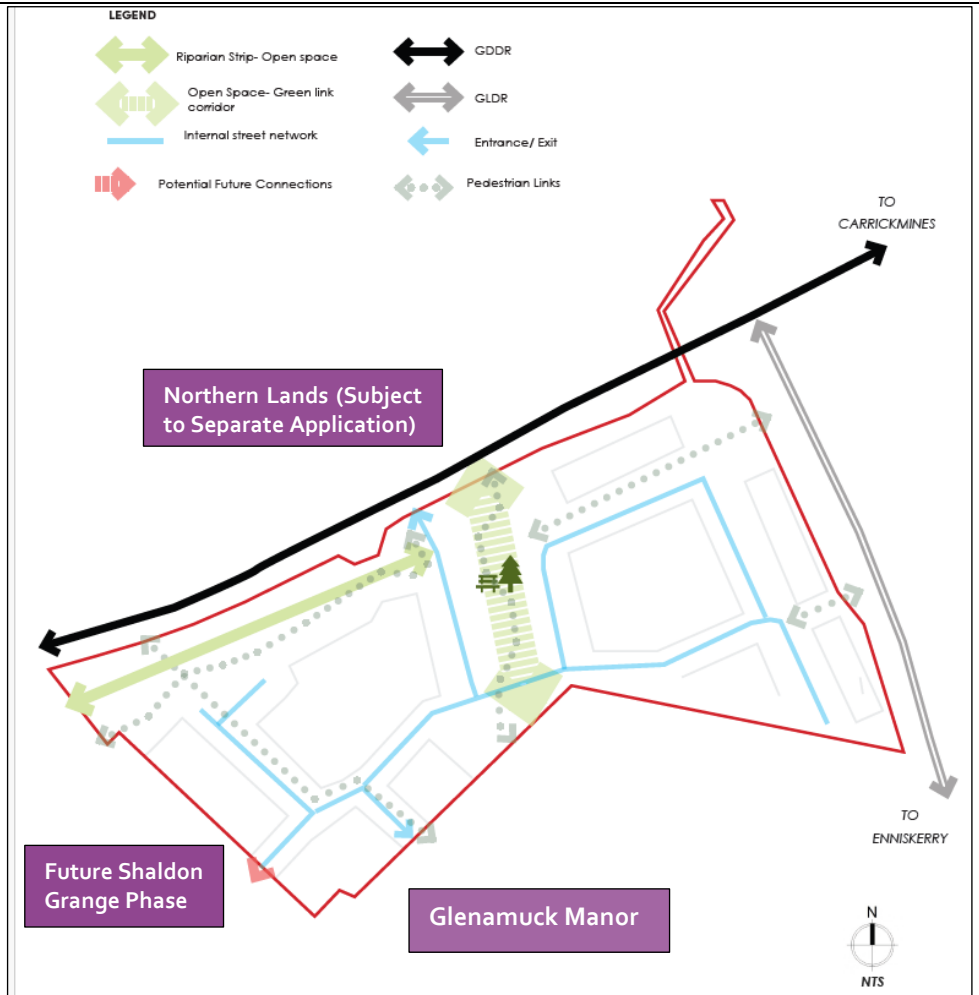


Figure 2.1: Proposed Connections at the Subject Site

(Source: Architectural and Urban Design Statement by MCORM Architecture and Urban Design, Annotated by Thornton O'Connor Town Planning, 2025)

		<p>Permeability is inherent to the design and layout of the scheme and single movement corridor have been avoided. The layout provides a legible internal street network that links residential cells, public open spaces, and surrounding developments. Streets are laid out in a permeable grid-like structure, avoiding cul-de-sacs and enabling pedestrian and cyclist movement across the site via multiple route options. Wayfinding is supported by a clear and legible movement network, with routes aligned along natural desire lines such as the central green public open space which acts as an informal pedestrian and cyclist route through the scheme.</p> <p>Pedestrian and cycle priority is achieved through the design of the internal streets as a low-speed, low-traffic environment. As set out in the accompanying <i>Traffic and Transport Assessment</i>, traffic calming measures have been incorporated into the proposed layout in the form of reduced corner radii, shorter straight road sections, narrowed carriageway widths (DMURS compliant) and the use of homezones. These measures will naturally prioritise pedestrians and cyclists over vehicles without the need for full segregation in all locations.</p> <p>As discussed in detail in the below response, the riparian corridor along the Glenamuck Stream is a fundamental landscape and ecological feature of the proposed scheme and thus hard infrastructure within this corridor has been minimised. In our opinion, a balance has been achieved between the need to: 1) facilitate permeable connections within and through the site, 2) provide large areas of public open space, and 3) protect and support biodiversity along the riparian corridor.</p> <p>All internal streets and open spaces are sufficiently passively surveyed by the proposed residential units as well as it's position along the GDRS, ensuring safe travel routes for pedestrians and cyclists is facilitated.</p> <p>A Quality Audit (including a Stage 1 Road Safety Audit) has been carried out as part of this subject application and is submitted herewith.</p>
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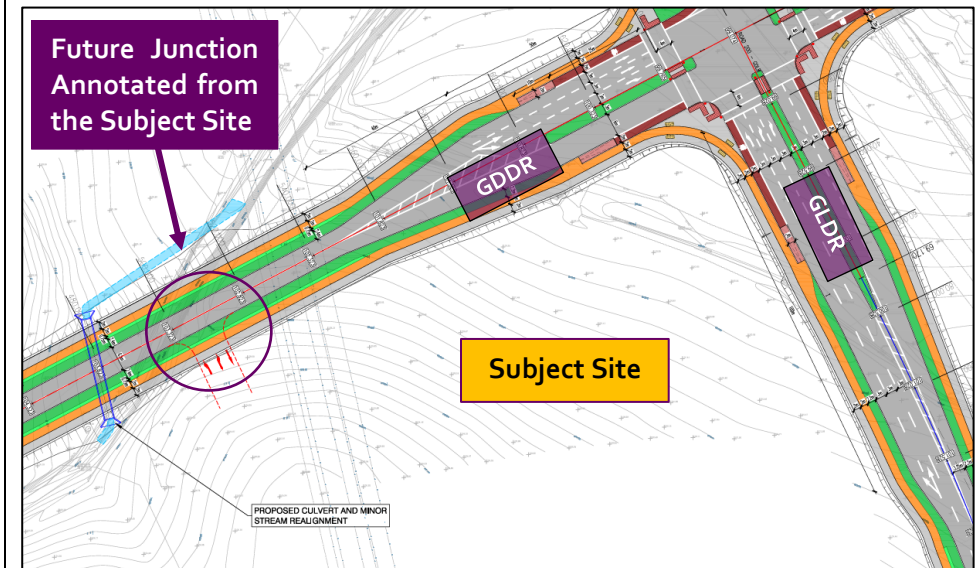
3. **Vehicular Access onto GDRS Scheme:** The Applicant will be required to submit a detailed justification for the location and design of the proposed vehicular onto the GDDR. The proposed layout shall also be subject to a detailed Road Safety Audit.

All potential impacts to the GDRS scheme and existing local road network shall be assessed in detail by way of a Traffic Impact Assessment which shall include for relevant committed developments.

The location of the proposed vehicular access point to the site from the GDDR has been thoroughly considered by the Applicant and Design Team having regard to the following:

**1. Junction Envisaged in the GDRS Application**

An indicative location of an access to the subject site was identified as part of the Glenamuck Distributor Roads Scheme (GDRS) application (ACP Reg. Ref. HA06D.303945), as illustrated in Figure 2.2 below.



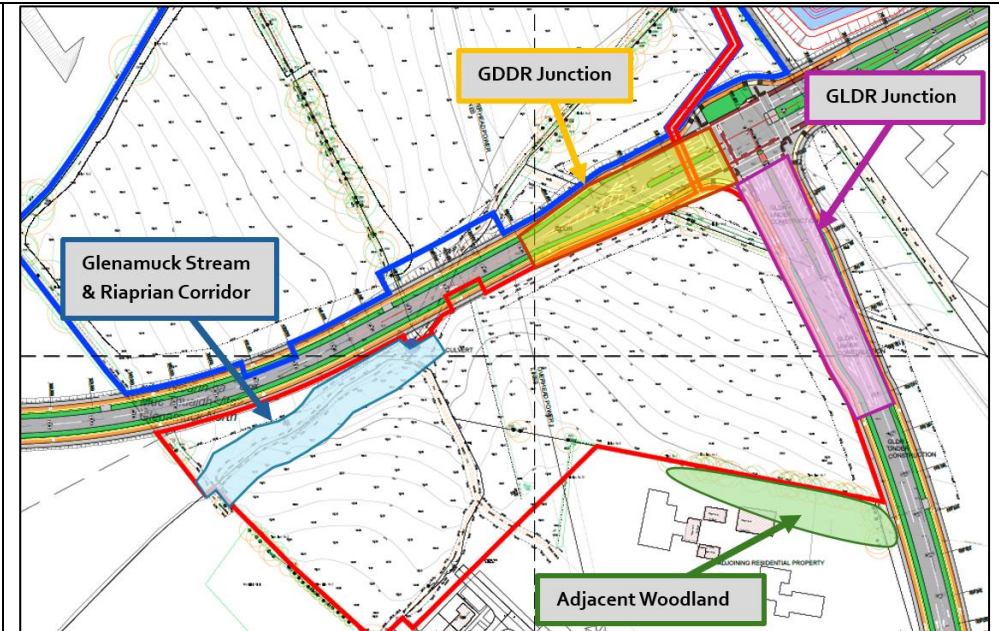
**Figure 2.2: Future Junction Access at the Subject Site Envisaged in the GDRS**

(Source: As submitted under ACP Ref. HA06D.303945, Annotated by Thornton O'Connor Town Planning, 2025)

		<p><b><u>2. Vehicular Access from the GDRS Required in the Kiltiernan–Glenamuck Local Area Plan 2025</u></b></p> <p>The following Objective under SDF4-1 in the recently adopted <i>Kiltiernan-Glenamuck Local Area Plan 2025</i> refers to the provision of a vehicular access to the site via the GDRS:</p> <p style="text-align: center;"><i>“Vehicular access to the site will be via the Glenamuck District Roads Scheme and from lands to the south and west with permeability links to schemes to the south, west and east.”</i></p> <p>Due to the extent of the GLDR layout where it meets the GDDR, the junction infrastructure occupies almost the entirety of the site’s eastern boundary. As a result, it was not considered appropriate to provide a vehicular access to the site from the GLDR without adversely impacting the junction layout.</p> <p>While the GDDR junction layout is also located adjacent to part of the site’s northern boundary, the site extends sufficiently along the GDDR to allow a vehicular access to be accommodated clear of the junction. This opportunity does not exist along the GLDR, and therefore, out of the two roads in the GDRS, a vehicular access to the site can only be provided from the GDDR.</p> <p><b><u>3. Glenamuck Stream Flowing Across North-Western Extent</u></b></p> <p>The Glenamuck Stream is located within the north-western portion of the site and flows in a north-eastward direction before culverting beneath the GDDR and re-emerging again as an open watercourse on lands to the north of the site (subject to a separate application). As noted throughout the documentation submitted with this application, the stream will be incorporated into the proposed development as a key landscape feature, providing visual amenity for future residents and the wider community and improving the stream’s biodiversity and ecological value.</p>
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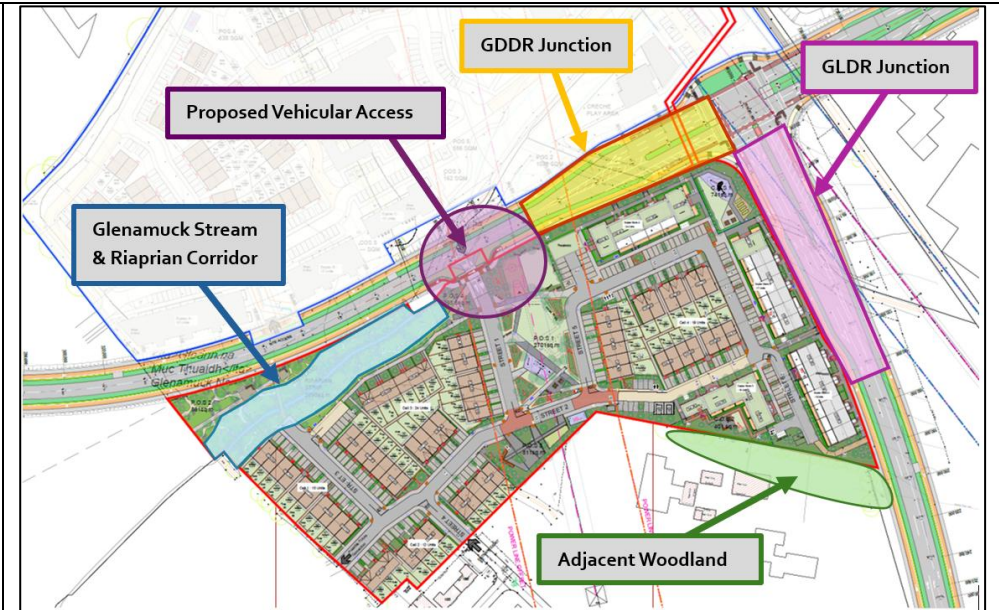
		<p>The retention and enhancement of the stream has been a fundamental consideration in the design of the proposed scheme. In this regard, it was not considered appropriate to locate a vehicular access along the western extent of the site's northern boundary as this would necessitate either the construction of a bridge over the stream or the culverting of the watercourse. Such works would conflict with the design objectives of the scheme and result in unnecessary intervention within and adjacent to the stream corridor. Accordingly, a vehicular access cannot be provided at this location.</p> <p><b><u>4. Possible Visibility Splay Issues Along GLDR from Adjacent Woodland</u></b></p> <p>There is space along the eastern boundary of the site, further south of the GLDR junction, which has potential to facilitate a new vehicular access to the site. However, there is a blanket of trees located outside the subject site's southern boundary (and outside the control of the applicant) which abuts the eastern extent of the boundary and continues eastwards toward the GLDR. If a vehicular access was to be provided at the south-eastern corner of the site, then some of these trees may require removal or the canopies of the trees would require regular upkeep and maintenance to ensure sufficient visibility splays are provided from the access at all times.</p> <p>Not only are these trees outside the ownership of the applicant and therefore beyond the remit of this planning application, but all reasonable efforts have been made to ensure that the proposed development does not adversely affect these trees given their landscape and ecological value. In our opinion, a vehicular access cannot be provided at this location.</p> <p><b><u>5. Proposed Vehicular Access</u></b></p> <p>The restrictions posed by the GDDR and GLDR junction layouts relative to the site's boundary, the location of the Glenamuck Stream and its Riparian Corridor across the site, and the area covered by the existing blanket of trees are outlined on the existing site layout plan provided in Figure 2.3.</p>
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**Figure 2.3: Existing Site Layout Plan (Outlined in Red) with the Vehicular Access Restrictions Identified**

(Source: Drawing No. 'COWLDS-MCORM-AR-XX-DR-P4-XX-1000' by MCORM Architecture and Urban Design, Annotated by Thornton O'Connor Town Planning, 2025)

Figure 2.4 provides these same features but on the proposed site layout which clearly illustrates that the proposed new vehicular access along the site's northern boundary is the most appropriate location to provide such access.



**Figure 2.4: Proposed Site Layout Plan (Outlined in Red) with the Vehicular Access Restrictions and the Proposed Vehicular Access to the Site Identified**

(Source: Drawing No. 'COWLDS-MCORM -AR-XX-DR-P4-XX-1007' by MCORM Architecture and Urban Design, Annotated by Thornton O'Connor Town Planning, 2025)

We also note that the proposed access is within the general area of the indicative access outlined in the GDRS application, thus further demonstrating the suitability of it.

The proposed access will provide frontage and is set back sufficiently from the GDDR junction with the GLDR to the east to provide safe stopping sight distances. It incorporates a 6m wide vehicular entrance with an uncontrolled pedestrian crossing across the access in addition to a ramped cycle track crossing along the GDDR frontage. The junction between the cycle track and the access road has

		<p>been designed in accordance with Junction TL402 (Standard Cycle Track Crossing Side Road with Priority – Partial Set Back) of the Cycle Design Manual (CDM). The pedestrian crossing has been designed in accordance with DMURS Advice Note 6 (Priority Junction Tightening Measures). The design includes a dropped kerb, a stop line and associated signage and tactile paving to alert visually impaired users to the crossing point. For further details see Meinhardt General Arrangement Drawing (4426-MHT-XX-ZZ-DR-C-0100) submitted with this application. A Quality Audit (including a Stage 1 Road Safety Audit) has been carried out which has further influenced the design and layout of the proposed vehicular access.</p> <p><b>6. <u>Impact onto Local Road Network</u></b></p> <p>A <i>Traffic and Transport Assessment</i> has been prepared by Meinhardt which details any potential impacts of the proposed development to the GDRS and local road network. The <i>Traffic and Transport Assessment</i> states that the proposed development is forecast to generate approximately 53 No. two-way trips in the AM and 51 No. two-way trips in the PM peak. The traffic survey conducted at the subject site during the AM peak found there to be a total of 1,028 No. trips on the network during this period. This would result in the proposed development generating a 5.16% increase in traffic compared to the base flow recorded during the traffic survey.</p> <p>Having regard to the 5.16% increase in traffic, the <i>Traffic and Transport Assessment</i> concludes the following:</p> <p><b><i>"....the existing road network surrounding the site has sufficient capacity to accommodate the additional trips generated by the proposed development without resulting in undue queuing or delay" [Our Emphasis]</i></b></p> <p>The <i>Traffic and Transport Assessment</i> also sets out a series of thresholds from the Department of Transport's <i>Traffic Management Guidelines</i> (2018, amended in 2022) which are used to determine when Transport Assessments are required for</p>
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		<p>a development. Out of the 7 No. thresholds, only 3 No. have the potential to be applicable to the proposed development which are as follows:</p> <ul style="list-style-type: none"> <li>➤ Traffic to and from the development exceeds 10% of the traffic flow on the adjoining road.</li> <li>➤ Traffic to and from the development exceeds 5% of the traffic flow on the adjoining road where congestion exists or the location is sensitive.</li> <li>➤ Residential development in excess of 200 dwellings.</li> </ul> <p>Having regard to these thresholds, the <i>Traffic and Transport Assessment</i> concludes:</p> <p><i>"As the scheme comprises 135 residential units and, as previously referenced, the anticipated trip generation would increase traffic flows on the adjoining road by 5.16% which does not experience congestion and is not a sensitive location, <b>the development does not meet any of the three relevant thresholds that would require a Transport Assessment.</b>" [Our Emphasis]</i></p>
<b>Kiltiernan–Glenamuck Local Area Plan 2025: Site Development Framework No. 4</b>		
4.	<p><u>Compliance with Kiltiernan–Glenamuck Local Area Plan 2025:</u> Any subsequent application shall have full regard to the development criteria outlined for Site Development Framework No. 4 and the Character Area of 'Glenamuck North'.</p>	<p>Please refer to Section 7.1 of the <i>Planning Report &amp; Statement of Consistency</i> prepared by Thornton O'Connor Town Planning submitted herewith for a response to each of the SDF4 criteria and the Glenamuck North Character Area outlined in the <i>Kiltiernan–Glenamuck Local Area Plan 2025</i>.</p>
<b>Layout and Masterplan</b>		
5.	<p>The Planning Authority recognises the constraints faced by the applicant with powerlines crossing the site. The planning authority note that the powerlines impact on the layout of the site and how the scheme successfully addresses the GDDR and GLDR on the current site and the northern site. The applicant is requested to review the approach taken to the issue of Public Open Space on nearby sites</p>	<p>The Applicant acknowledges the presence of the 220KV overhead powerlines traversing the centre of the site in a north-south direction and the <i>Development Plan's</i> restriction on providing built development within 30-metres of a 220KV line. Notwithstanding this, it is submitted that the provision of publicly accessible and usable open space beneath the overhead lines is both appropriate and consistent with established planning practice.</p>

<p>under the same 220kv lines as regards the extent to which these areas can be considered part of the public open space provision for the site, or must be counted as additional open space.</p>	<p>The areas beneath the power lines are fully accessible, overlooked by surrounding development, and integrated into the overall open space network of the scheme. They are designed as recreational and amenity spaces incorporating lawn areas, pedestrian routes, seating, landscape planting, a basketball court, play spaces and biodiversity measures, rather than residual or left-over land. As such, these spaces provide meaningful recreational and visual amenity for residents and function as an integral component of the public open space provision.</p> <p>The live conductors of the 220kV overhead electricity transmission lines are located at a minimum height of approximately 8-9 metres above ground level, equivalent to the height of a approximately 2 No. double-decker buses stacked vertically. This significant vertical separation ensures that the proposed open space use operates well below statutory clearance requirements and represents an appropriate, safe and policy-compliant use of the land. It is noted that overhead power lines are a common feature within urban and suburban environments and do not, in themselves, preclude the provision of high-quality public open space such as that proposed as part of this application. The presence of the lines does not restrict public access, passive recreation, or day-to-day use of these areas, nor does it give rise to any safety or operational issues, subject to compliance with the relevant building clearance requirements, which are met in this instance.</p> <p>The landscape design has been carefully considered to ensure that the quality and usability of these spaces is not undermined. The open character of the land beneath the power lines is well suited to informal open space, allowing for generous green areas, permeability, and visual openness. Planting proposals are specifically tailored to respect height restrictions while delivering a high standard of amenity, ecological value, and visual interest.</p> <p>Furthermore, we note that the provision of public open space under 220KV powerlines has been established on sites nearby the subject site such as Rockville Phase 2B (DLRCC Reg. Ref. D20A/0015 / ACP Ref. ABP-306999-20, amended</p>
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		<p>under DLRCC Reg. Ref. Reg. Ref. D23A/0580) and Kilternan Village LRD (DLRCC Reg. Ref. LRD24A/0597).</p> <p>In their assessment of the location of the public open space beneath the 220KV powerlines as part of the “Parent” application for Rockville Phase 2B, the Planning Inspector concluded the following:</p> <p><i>“While, I note that the proposed open space area is within the restriction corridor for the 220Kv electricity line <b>an extensive area of public open space has been proposed along with communal open space</b>. Furthermore, I note the <b>proximity of other existing open space areas and the future local park</b>. Having regard to the particular constraints of the site I would concur with the opinion of the Board as detailed in their previous direction that <b>the proposed configuration of the surface car parking and open space areas would be acceptable</b> subject to landscaping measures to improve the public realm in the vicinity of the car park.” [Our Emphasis]</i></p> <p>Having regard to the previous assessment made by the Planning Inspector and the Commission’s decision to grant permission for Rockville Phase 2B, the DLRCC Planning Officer concluded the following in their assessment of the provision of public open space beneath the same powerlines in the amendment application:</p> <p><i>“The Planning Authority is generally satisfied with the overall layout of the scheme, in that <b>the footprint adequately responds to the shape of the site and its constraints in relation to the overhead power line</b>.....While it is accepted that the quality of the open space is significantly impacted by the presence of the overhead power line, consideration is given to the previous decision sequences on this matter, and it is accepted in this case that <b>due to the viability of the site, the quantum and configuration of open space adequately responds to these constraints</b>.” [Our Emphasis]</i></p> <p>No concerns were raised by the DLRCC Planning Officer in their assessment of the public open space provided beneath the powerlines in the Kilternan Village LRD.</p>
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		<p>Rather, it is noted in their report that the siting and configuration of the public, communal and incidental open spaces “<i>are considered acceptable on review of the submitted landscape and open space plans.</i>”.</p> <p>In addition to the abovementioned precedents in proximity to the subject site, we also note the recently published <i>Kiltiernan–Glenamuck Local Area Plan 2025</i> whereby Section 2.5.1 sets out the urban design strategy applicable to the GDRS (future Kiltiernan Road and Kiltiernan–Glenamuck Link Road), including the Glenamuck North Character Area (which the subject site is located in) and other adjacent character areas. In this regard, we note the following key landscape components listed in the LAP that relate to urban design and development principles:</p> <ul style="list-style-type: none"> <li>• “<i>Provision of a “Strategic Green Corridor” which <b>connects a series of green spaces between Jamestown Park to the north and lands to the south of the Plan</b></i>”</li> <li>• <i>Utilising the southern 110KV and 220KV powerlines as an open space spine while recognising the challenges they present.” [Our Emphasis]</i></li> </ul> <p>Evidently, green open spaces beneath the 110KV and 220KV powerlines is sought after in the LAP and the proposed development will contribute to this provision.</p> <p>Having regard to the above, it is submitted that the public open space provided beneath the 220kV power lines should be counted as part of the overall public open space provision for the site. The proposed development represents an efficient and appropriate use of constrained land, ensures compliance with open space standards, and delivers usable, attractive, and well-integrated public amenity for future residents.</p> <p>Please refer to Appendix A of the <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for additional comments.</p>
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6.	<p>The applicant is requested to provide details of how the current and the northern site are to be linked ie. Clarity on the red and blue lines, include details of shared services / infrastructure proposals.</p>	<p>The following provides a summary of the red and blue lines of the Masterplan lands (subject site and northern lands which are subject to a separate application and will be lodged to DLRCC before the expiration of the LRD Opinion in February 2026) in terms of land ownership:</p> <p><u>Subject Site:</u></p> <ul style="list-style-type: none"> <li>➤ Main development site = Adderig 4 Residential Limited<sup>1</sup>;</li> <li>➤ Road and drainage works along the GDDR= DLRCC's control; and</li> <li>➤ Drainage works on northern land = "Cowley Family"</li> </ul> <p><u>Northern Site:</u></p> <ul style="list-style-type: none"> <li>➤ Main development site = "Cowley Family"; and</li> <li>➤ Road works along the GDDR = DLRCC's ownership.</li> </ul> <p>For absolute clarity, the blue ownership line shown on the OS Map submitted herewith outlines the main development site of the northern lands as the red line associated with the subject site extends minimally into these lands to facilitate part of the proposed drainage works. Thus, the blue line does not represent either the Applicant's or southern landowner's ownership. A Letter of Consent has been received from the "Cowley Family" and is submitted herewith.</p> <p>Please refer to the <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for details on how the two sites are linked in terms of connectivity and permeability.</p> <p>A Section 32B meeting request for the southern lands was lodged to DLRCC earlier than the request for the northern lands as the layout for these northern lands required further consideration due to greater site constraints associated with the northern lands (110KV &amp; 220KV powerlines and the Glenamuck Stream traversing the site). Subsequently, this planning application at the subject site is lodged prior to an application for the northern lands.</p>
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<sup>1</sup> We note that the landowner of the main development site has changed since the LRD Opinion was issued.

		<p>However, at the time of writing, the current layout for the northern lands will facilitate the provision of 219 No. residential units comprising a mix of houses, duplex units and apartment units (44 No. 1-bed units, 45 No. 2-bed units, 112 No. 3-bed units and 18 No. 4-bed units) as well as a creche and a large quantum of public open space.</p> <p>While the creche is provided as part of the northern lands application, it will cater for the childcare demand of the two sites across the Masterplan area. Currently, the design of the creche will provide approximately 500 sq m of gross floor space and will cater for approximately 80 No. childcare spaces which is in excess of the currently identified childcare demand of the Masterplan area. The size of the creche is an approximate only and finalised details of it will be included as part of the northern lands application to be submitted soon. Please refer to the <i>Social Infrastructure Audit</i> for full details on the childcare demand across the Masterplan lands.</p>
7.	<p>The Planning Authority requests the applicant explore an alternative layout at the northeast corner of the site to ensure that this prominent corner is activated and reads a focal point given its prominent location at the junction of the GDDR and GLDR. Ideally the layout should include residential units at this junction. The current proposal for communal open space at this location is not considered appropriate. The Planning Authority notes that parts of the site cannot provide an active frontage to the road (such as the park area with overhead powerlines above) and the green corridor to the west of the site, in this regard, there is an expectation that the northern and eastern side of the site would address the road and enhance the visual appearance of this new residential area.</p>	<p>In summary, the north-east corner of the site has been thoroughly considered by the Design Team and ultimately, the site levels within this portion of the site dictates the required drainage layout for the development. In this regard, building structures cannot be positioned within this corner as this area must provide the required drainage infrastructure (see <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> for details). Nevertheless, the Architects have introduced a revised 4 No. storey duplex block type (Block A and B) that addresses both the GDDR and GLDR to create additional frontage. All front door entrances now front the GDDR and GLDR to further promote active street frontage. Please refer to Appendix A of the <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for a response to this item.</p>
8.	<p>The applicant shall set out clearly proposed vehicular and pedestrian links through to existing and future developments and to provide letters of consent from neighbouring landowners as appropriate. It is</p>	<p>All vehicular and pedestrian links through the site and into existing and future developments are illustrated on the Proposed Site Layout Plan prepared by</p>

	<p>expected that where areas have been developed on adjacent sites, that linkages will be provided 'on day 1'.</p>	<p>MCORM Architecture and Urban Design. The following provides a summary of the relevant letters of consent required to facilitate the proposed connections:</p> <ul style="list-style-type: none"> <li>➤ A Letter of Consent has been provided by DLRCC to facilitate access onto the GDDR, including any road and infrastructure works.</li> <li>➤ A legal document has been provided which demonstrates that the landowner of the subject site has a right of way to connect into the existing street network of Glenamuck Manor to the south.</li> <li>➤ Two future connection points are identified along the western boundary of the site to connect into lands to the west should any future development come forth on the undeveloped portion of the Shaldon Grange lands. The proposed layout facilitates the infrastructure associated with a vehicular and pedestrian link right up to the western boundary, however, as the proposed development does not physically connect into the lands and given there is no existing development to connect into, in our opinion, no Letter of Consent from the adjoining landowner is required.</li> </ul>
<b>Documents to be Provided:</b>		
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of open spaces within apartment buildings, landscaped areas, pathways, entrances, and boundary treatment/s. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. All proposed material treatments should give particular consideration to the restoration and conservation of the two no.</p>	<p>Please refer to the accompanying <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for details.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with section 6.3 of</p>	<p>Please refer to the accompanying <i>Lifecycle and Management Report</i> prepared by MCORM Architecture and Urban Design and the <i>Operational Waste Management Plan</i> prepared by DNV for details.</p>

	the Sustainable Urban Housing: Design Standards for New Apartments (2023).	
•	A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views, preferably including winter views, that would assist in understanding the relationship between the proposed development and its context.	Please refer to the accompanying suite of drawings prepared by MCORM Architecture and Urban Design and the <i>Verified Views and CGIs</i> prepared by 3D Design Bureau for details. We note that winter views were not possible to provide, however, the views taken by 3D Design Bureau were captured in September 2025, whereby leaves of trees had started to fall. Therefore, it is submitted that the accompanying <i>Verified Views and CGIs</i> prepared by 3D Design Bureau provides an appropriate indication of how the proposed development will integrate well into the existing environment and will provide sufficient frontage along the GDDR and GLDR.
•	A Housing Quality Assessment which provides the specific information regarding the proposed apartments required by the Dun Laoghaire County Development Plan 2022-2028 and the 2020 Guidelines on Design Standards for New Apartments. The assessment should also demonstrate how the proposed dwellings and apartments comply with the various requirements of the Development Plan and the guidelines.	Please refer to the accompanying <i>Housing Quality Assessment</i> prepared by MCORM Architecture and Urban Design for details.
•	A Building Lifecycle Report.	Please refer to the accompanying <i>Lifecycle and Management Report</i> prepared by MCORM Architecture and Urban Design for details.
•	Details regarding the long-term management of both the apartment and housing development, and its communal facilities	Please refer to the accompanying <i>Lifecycle and Management Report</i> prepared by MCORM Architecture and Urban Design and the <i>Operational Waste Management Plan</i> prepared by DNV for details.
•	A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking (or lack thereof) provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.	Please refer to the accompanying <i>Traffic and Transport Assessment</i> and <i>Mobility Management Plan</i> prepared by Meinhardt for details.
•	A quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment	Please refer to Drawing No. 'COWLDS-MCORM-AR-XX-DR-P4-XX-1010' prepared by MCORM Architecture and Urban Design and the suite of landscape

	shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc	drawings and report prepared by NMP Landscape Architecture for details on the proposed public and communal open space provision.
•	Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site, discharge rates equal to greenfield sites, integration of appropriate phased works.	Please refer to the suite of civil engineering documents prepared by Roger Mullarkey & Associates for details.
•	Submission of a Taking in Charge Map	Please refer to Drawing No. 'COWLDS-MCORM-AR-XX-DR-P4-XX-1008' prepared by MCORM Architecture and Urban Design for details.
•	Submission of a Construction Management Plan	Please refer to the accompanying <i>Construction Management Plan</i> prepared by Meinhardt for details.
•	A letter from Irish Water confirming that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development obtained no more than 6 months before the date of lodgement of the LRD Application	Please refer to the accompanying <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates for details.
•	Information/documentation which address the appended assessments from the following internal departments (Appendix C): a. Drainage Planning; b. Transportation Planning; c. Environmental Enforcement; d. Public Lighting; e. Parks and Landscaping; f. Housing	Please refer to Section 3.0 below for the relevant information/documentation and responses to each as requested from DLRCC internal departments that have not been directly included as part of the LRD Opinion.

### 3.0 ADDITIONAL ITEMS NOTED/REQUESTED BY INTERNAL DEPARTMENTS

	Items to be Addressed	Response
<b>Drainage</b>		
1.	The applicant is requested to contact drainage planning to discuss the issues of the features on site and discuss and agree how this features will be dealt with in an appropriate manner, in accordance with the requirements of our development plan policies as well as best practice. The “drain” should be assessed by a suitably qualified person to determine if the feature is a relevant waterbody. It is not acceptable to divert this flow into an attenuation system that has not been designed to cater for this flow.	The drain in question was assessed and determined to be a continuation of a land drain constructed below the recently completed Glenamuck Manor housing scheme. It was noted to be a 225mm diameter plastic pipe and drains part of a private property upstream called “Shaldon Grange”. Discussions were held with the Water Services Department regarding this element and it was determined that to avoid any conflict with the proposed attenuation system, the existing drain would be diverted into a new 300mm diameter pipe that remains independent of the proposed attenuated system and this pipe will pass through the development to a new outfall into the Glenamuck Stream. Refer to Dwg.2411/101 for further detail.
2.	The applicant has provided two different SAAR values in the application. Consistency in the data used for calculations is required.	A SAAR of 994mm has been determined as accurate based on the latest available data from Met Éireann and is noted twice in the main report as such.
3.	<p>It should be noted that Microdrainage has default Cv values of 0.84 for Winter and 0.75 for Summer. These should be amended to a value of 1.0, particularly where applicants are proposing reduced PIMP(%) values. Maintaining the default Cv values reduces the run-off in simulations of rainfall events, giving inaccurate simulation results which may lead to undersizing of the drainage system and attenuation storage.</p> <p>The applicant is requested to resubmit their Microdrainage calculations using the correct total contributing area, and either PIMP(%) of 100 or Cv values of 1.0, and site specific or local data, such as SAAR, Soil Type, Rainfall Return Period Table (available from MET Eireann), rainfall intensity and other hydrological parameters. The applicant must clearly state and justify all inputs used in Microdrainage and agree these with Drainage Planning prior to submission of the final application.</p>	The Cv values have been set to 1.0 for both summer and winter events in the calculations provided. The Met Éireann data has also been provided which include the SAAR=994, M5/60=16.0mm and r=0.276.

4.	As standard, the applicant is requested to ensure that all surface water design proposals are in accordance with the requirements of Appendix 7: Sustainable Drainage System Measures of the County Development Plan 2022-2028.	Compliance with Appendix 7 is demonstrated in detail in the <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates.
5.	As standard, the applicant is requested to ensure that the proposed surface water design is in accordance with County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EL4: Sustainable Drainage Systems, such that the proposal meets the requirements of the Greater Dublin Strategic Drainage Study (GSDS) policies in relation to Sustainable Drainage Systems (SuDS). The design must incorporate SuDS measures appropriate to the scale of the proposed development such as green roofs, bioretention areas, permeable paving, rainwater harvesting, swales, etc. that minimise flows to the public drainage system and maximises local infiltration potential.	A full SuDS treatment train approach has been implemented in the design and is detailed in Chapter 7 of the <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates.
6.	Any changes to parking and hardstanding areas shall be constructed in accordance with the recommendations of the Greater Dublin Strategic Drainage Study for sustainable urban drainage systems (SuDS) i.e. permeable surfacing, and in accordance with Section 12.4.8.3 Driveways/Hardstanding Areas of the County Development Plan 2022-2028. Appropriate measures shall be included to prevent runoff from driveways entering onto the public realm as required	This is noted. However, no changes are proposed to the application parking / hardstanding areas.
7.	The applicant has indicated, in the Taking in Charge drawing, that the lands where the attenuation tank for catchment 2 is located is not to be taken in charge. The applicant should specify whether the proposed area will be taken in charge or privately managed and provide the details of the management company that will maintain the proposed surface water drainage network as required. A wayleave should be provided if the area is not to be taken in charge	This area is to remain as privately managed and subject to a successful planning decision; the details of the management company are to be agreed at planning compliance stage as will a wayleave.
8.	The applicant shall ensure that trees shall not be planted in the area over the attenuation tank. Trees shall be placed at a minimum distance of 2m from the edge of attenuation tanks. Tree protection barriers may be required, depending on the tree species and the expected extent of root spread, to be advised by the landscape architect	This is noted.

9.	The applicant is requested to confirm that a utilities clash check has been carried out ensuring all utilities' vertical and horizontal separation distances can be provided throughout the scheme. The applicant should demonstrate this with cross-sections at critical locations such as junctions, site thresholds and connection points to public utilities. Minimum separation distances shall be in accordance with applicable Codes of Practice	The application has maintained the required separation distances and a clash check has been carried out. Refer to Drawing Nos. 2411/109 to 2411/112 and 2411/116 prepared by Roger Mullarkey & Associates for further detail.
10.	As standard, and as noted within the application, the applicant is requested to ensure that a Stage 1 Stormwater Audit is carried out for the development. In accordance with the Stormwater Audit policy, the audit shall be forwarded to DLRCC prior to lodging the planning application. All recommendations shall be complied with, unless agreed in writing otherwise with DLRCC.	A Stormwater Audit has been completed and the results submitted to DLRCC prior to lodgement of this planning application. Please refer to Appendix 11.17 of the <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates.
11.	As standard, the applicant is requested to submit long-sections of the surface water drainage system, clearly labelling cover levels, invert levels, pipe gradients and pipe diameters	Long-sections have been provided as part of this application. Please refer to Drawing Nos. 2411/109 to 2411/112 prepared by Roger Mullarkey & Associates.
12.	As standard, the applicant is requested to provide a penstock in the flow control device chamber and ensure that the flow control device provided does not have a bypass door. The applicant shall also clarify whether a silt trap is being provided in the flow control device chamber and if not to make provision for same	Penstock and removal of the bypass operation is noted and details of same are shown on Drawing No. 2411/108 prepared by Roger Mullarkey & Associates.
13.	As standard, the applicant is requested to provide fully dimensioned plans and sections of the attenuation storage system. All relevant inlet and outlet levels, dimensioned clearances between other utilities, and actual depths of cover to the tank shall be provided. The applicant shall include confirmation from the chosen manufacturer of the storage system that the specific model chosen, with the depth of cover being provided, has the required load bearing capacity to support the loading that may imposed upon it.	Details of same are shown on Drawing No. 2411/108 prepared by Roger Mullarkey & Associates. Correspondence from the attenuation storage manufacturer has been included in the Appendix of the <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates.
14.	As standard, the applicant is requested to show the options being proposed for interception and treatment with contributing areas on a drawing together with	Please refer to Drawing No. 2411/106 for catchment measurements and interception tabature (also included in Section 6.19 and Appendix 11.2



	an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GDSDS requirements. The applicant should note that over-provision in one location does not compensate for under provision elsewhere	of the <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates).
15.	The applicant shall ensure a minimum wayleave distance of 6.0m (3.0m either side from the external face of the pipe to any building/foundation) shall be provided for all foul water sewers located within the site.	This is provided.
<b>Transportation Planning</b>		
1.	<p>With regard to the required quantity of cycle parking, provision shall be demonstrated as follows:</p> <ul style="list-style-type: none"> <li>• 1 No. long stay cycle parking space per bedroom.</li> <li>• 1 No. short stay cycle parking space per 5 No. units.</li> </ul> <p>Of these, a minimum of 1 short &amp; long stay cycle parking space per unit shall be the preferred "Sheffield" type, with the remainder provided to a design of the Applicant's choosing, subject to adequate positioning and passive surveillance across the site. If stacked over Sheffield cycle parking is proposed, a proportion of Sheffield cycle parking shall be provided with no overhead obstruction.</p> <p>In relation to cycle parking provision for dwelling houses, it is acceptable that bikes be brought through to the rear, where rear access is provided for long-term cycle parking.</p>	These cycle parking requirements have been provided. Please refer to the <i>Mobility Management Plan</i> prepared by Meinhardt for details.
<b>Environmental Enforcement Department</b>		
1.	<p><u>Operational Noise Management</u></p> <p>The final detailed design and location of building services, such as heat pumps, must avoid the generation of potential conflicts in terms of noise amenity affecting adjoining land uses.</p>	Please refer to the Acoustic Design Statement prepared by Wave Dynamics for details.
2.	<u>Construction Environmental Management Plan</u>	Please refer to the <i>Construction &amp; Environmental Management Plan</i> prepared by DNV for details.

	<p>Submission of a '<i>Construction Environmental Management Plan</i>' (CEMP) setting out proposals for environmental management of the proposed works to avoid the creation of serious environmental nuisance, such as noise, dust and other emissions that may be considered an environmental nuisance.</p> <ul style="list-style-type: none"> <li>a) Confirmation that deliveries should not occur before 07:00 nor should vehicles be allowed to queue in advance of this time.</li> <li>b) Methods to ensure that vehicles leaving the site are clean with commitment to install a wheel wash equivalent method for cleaning down vehicle prior to leaving the site during construction.</li> <li>c) Measures to reduce any adverse impacts of the construction phase upon the environment.</li> <li>d) Measures to control temporary noise, dust and airborne pollutant emissions during the construction phase.</li> <li>e) Measures to prevent nuisance or adverse health effects.</li> <li>f) Dust Minimisation and Monitoring Plan should be provided as a compliance submission with details dust mitigation levels and dust monitoring commitments.</li> <li>g) Measures should align with and reflect the mitigation measures described in the Resource and Waste Management Plan.</li> </ul> <p>The Applicant and the appointed Contractor(s) shall ensure that in terms of Construction Waste, records shall be maintained and made available for inspection on site demonstrating tracking of all waste generated to final destination.</p>	
3.	<p><u>Operational Waste Management Plan</u></p> <p>An operational waste management plan should be provided as part of any future application to ensure management of all operational waste within the curtilage of the development in accordance with relevant waste legislation including byelaws.</p>	<p>Please refer to the <i>Operational Waste Management Plan</i> prepared by DNV for details.</p>

	The plan shall include detail in relation to waste storage and collection, measures within individual units to support segregation of waste and proposed measures in relation to access, monitoring and security of proposed bin stores	
4.	<p><u>Public Liaison Plan</u></p> <p>The Applicant and the developments Contractor shall develop and implement a 'Public Liaison Plan' for the duration of the works, covering the following:</p> <ul style="list-style-type: none"> <li>a) Appointment of a Liaison Officer as a single point of contact to engage with the local community and respond to concerns.</li> <li>b) Keeping local residents informed of progress and timing of particular construction activities that may impact on them.</li> <li>c) Provision of a notice at the site entrance identifying the proposed means for making a complaint.</li> <li>d) Maintenance of a complaints log recording all complaints received and follow up actions.</li> </ul>	Please refer to the <i>Construction Environmental Management Plan</i> prepared by DNV for details.
<b>Infrastructure and Climate Change Department</b>		
1.	<p>The lighting design proposed here is acceptable to the public lighting section but there are a number of tree conflicts that need to be resolved.</p> <p>Example: Black areas in image below are tree blocked light. Purple circles are trees too close to the light.</p>	Any conflicts regarding lighting column and tree planting locations have been resolved as demonstrated in the Landscape Masterplan prepared by NMP and the Lighting Report prepared by OCSC.



#### Parks & Landscape

1.	<p>Generally, we want to avoid attenuation areas under our open spaces as per the CDP. If they are forced on us, the area they take up cannot be included in the Public open space calculation and there might be a shortfall, in which case a financial contribution in lieu of POS might ensue.</p>	<p>There is attenuation storage beneath the main public open space centrally in the site; however, this does not detract from the large lawn area proposed which will provide the local community with space to relax, socialise and play.</p> <p>We also note that attenuation storage has been accepted in other developments in proximity to the subject site, such as the Bishop's Gate scheme (ACP Ref. ACP-309846-21). Underground attenuation was located within the scheme's public open space and was not discounted from the open space provision. In their assessment of the underground attenuation, the Planning Inspector considered <i>"the inclusion of the proposed attenuation tank within the proposed public open space is a reasonable approach to the management of stormwater within the site"</i>.</p>
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		<p>There was no condition attached to the decision relating to a financial contribution in lieu of any open space shortfall.</p> <p>Therefore, it is submitted that the proposed public open space with attenuation storage beneath is appropriate and should not be discounted from the site's public open space provision.</p>
<b>Housing Department</b>		
1.	<p>It is noted that the applicant proposes to comply with the Part V requirement for the proposed development by way of transfer of twenty-four (24No.) residential units on site for social and affordable housing comprising; six (6No.) 1-bedroom duplex units, six (6No.) 2-bedroom duplex units and twelve (12No.) 3-bedroom duplex units.</p> <p>The proposal is acceptable in principle and can form the basis of future discussions on Part V compliance, however should planning permission be granted, an alternative mix of units may be sought.</p> <p>In order to fully assess the applicant's proposal, the Housing Department will require in the event that planning permission is granted, a detailed submission to include, inter alia, existing and development use land values, construction, development and any attributable costs associated with the development. Furthermore, in determining whether to enter into an agreement under Section 96(3)(b) of the Acts the Council will consider the applicant's proposal having regard to the criteria set out in Sections 96(3)(c) and (h) of the Acts.</p> <p>It is therefore recommended that should a decision be made to grant planning permission for the proposed development a condition be attached requiring the applicant/developer to enter into an agreement in accordance with Part V of the Planning and Development Act, 2000, as amended, prior to commencement, unless the applicant/developer shall have applied for and been granted an exemption certificate under section 97 of the Acts.</p>	<p>The Part V provision has been amended since the LRD Opinion stage due to a slight increase in residential units from 121 No. to 135 No. units and thus the number of Part V units has increased from 24 No. to 27 No. units. The Part V pack (drawings &amp; costings) was sent to DLRCC Housing Department prior to lodgement of this Application and a Validation Letter has been received and is submitted herewith.</p>

#### 4.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in Dún Laoghaire–Rathdown County Council’s Opinion. We trust that this document fully responds to all of the points raised by Dún Laoghaire–Rathdown County Council in their Opinion and we submit that the proposed development represents the proper planning and sustainable development of this site.

Signed:



**Patricia Thornton Director  
Thornton O’Connor Town Planning**