

Principal Planning Officer,  
Planning Department  
Dún Laoghaire-Rathdown County Council  
Marine Road  
Dún Laoghaire  
Co. Dublin  
A96 K6C9

1<sup>st</sup> November 2024  
[Online Portal Submission]

Dear Sir/Madam,

**Re: RESPONSE TO DUN LAOGHAIRE RATHDOWN COUNTY COUNCIL'S LRD OPINION, DATED 12<sup>TH</sup> AUGUST 2024 IN RELATION TO PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT OF 2.54 HECTARES AT KNOCKRABO, MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14, INCLUDING WORKS TO CEDAR MOUNT (A PROTECTED STRUCTURE) AND KNOCKRABO GATE LODGE (WEST), (A PROTECTED STRUCTURE).**

**LRD2/003/24**

## **1.0 INTRODUCTION**

Knockrabo Investments DAC<sup>1</sup> ("the Applicant") has retained Tom Phillips + Associates<sup>2</sup> ("TPA") in association with O'Mahony Pike ("OMP") Architects and a multi-disciplinary team to prepare this Response to a Large-scale Residential Development (LRD) Opinion issued by Dun Laoghaire Rathdown County Council ("DLRCC") on the 12<sup>th</sup> August 2024.

This Response has been prepared in association with the following members of the Design Team (note that this does not represent all members of the design team for this scheme):

- Altemar Ltd., Marine and Environmental Consultants<sup>3</sup>
- Aramark Property<sup>4</sup>
- Arborist Associates Ltd.<sup>5</sup>
- AWN Consulting<sup>6</sup>
- Dermot Foley Landscape Architects<sup>7</sup>
- James Slatterys Conservation Architects<sup>8</sup>
- IAC Archaeology<sup>9</sup>

<sup>1</sup> Block 3, Millbank Business Park, Lower Lucan Road, Lucan, Dublin, K78 K0D7.

<sup>2</sup> 80 Harcourt Street, Dublin 2, D02 F449.

<sup>3</sup> Templecarrig Upper, Greystones, Co. Wicklow.

<sup>4</sup> St Stephen's Green House, Earlsfort Terrace, Dublin, D02 PH42.

<sup>5</sup> 94 Ballybawn Cottages, Enniskerry, Co. Wicklow.

<sup>6</sup> The Tecpro Building, Clonshaugh Business & Technology Park, Clonshaugh, Co. Dublin, D17 XD90.

<sup>7</sup> Argus House, Blackpitts, Dublin, D08 DD56.

<sup>8</sup> No 8 Vergemount, Clonskeagh, Dublin 6, D06 FX30

<sup>9</sup> Unit G1, Network Enterprise Park, Kilcoole, Co. Wicklow, A63 KT32.

TOWN PLANNING CONSULTANTS

- Model Works<sup>10</sup>
- O'Mahony Pike (OMP) Architects<sup>11</sup>
- Tom Phillips + Associates, Town Planning Consultants
- Waterman Moylan, Consulting Engineers<sup>12</sup>

## 1.1 Pre-Planning Consultation

A Section 247 Meeting was held on the 14<sup>th</sup> March 2024 between the Applicant's Design Team, including the following personnel from DLRCC:

- Dara Holohan, Acting Senior Executive Planner
- Julie Craig, Conservation Officer
- Sean McGrath, Senior Engineer

An LRD meeting was subsequently on the 8<sup>th</sup> July 2024, with DLRCC and was attended by representatives of the Applicant and Design Team; along with representatives from Environment and Transportation, Planning, Drainage and Parks departments, as follows;

- Ciaran Daly
- Sam McDaid
- Ger Ryan
- Sam Geoghegan
- Desmond McHugh
- Sean McGrath
- Ultan Downes
- Johanne Codd
- Dara O Daly

The S.32B Meeting held 8<sup>th</sup> June 2024 was attended by the following members of the Design/Application Team;

- Katherine Flattery
- Susan Dawson
- Shane Kenny
- Mark Duignan
- Karlis Spunde
- Stephen Barrett
- Greg Casey

The LRD Meeting was informed by the LRD Meeting Request, submitted to the Planning Authority on 11<sup>th</sup> June 2024.

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<sup>10</sup> The Old Courtyard, Newtownpark Ave, Blackrock, Co. Dublin, A91 YD61.

<sup>11</sup> The Chapel, Mount St Annes, Milltown Avenue, Dublin 6, D06 XN52.

<sup>12</sup> Block S, EastPoint Business Park, Alfie Byrne Road, Dublin D03 H3F4.

## 1.2 LRD Opinion

Following consideration of the issues raised during the consultation process, the Planning Authority determined that the documentation submitted in accordance with s.32B of the *Planning and Development Acts, 2000 -2023* ('the Acts') did not constitute a reasonable basis on which to make an application for permission for a LRD, for the following reasons;

- Massing and clarity of approach regards any Separation and/or Interface of Development from/to 'Dublin Eastern Bypass' Reservation Corridor;
- Block 'E' Impacts on Receiving Context;
- Building Height (demonstrate compliance with the requirements of *Urban Development and Building Heights: Guidelines for Planning Authorities* (DoHPLG, 2018) and the *Building Height Strategy* (Appendix 5) of Dún Laoghaire-Rathdown County Development Plan 2022-2028);
- Compact Settlement Guidelines (demonstrate compliance with the relevant parameters of the *'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' 2024.*)

Under the provisions of s.32D of the Act, the LRD Opinion identifies 15 No. further items that require the Applicant's Response as part of the LRD Planning Application.

In the interest of clarity, we have responded to the Items raised in the order that they appear in the LRD Opinion issued. Where relevant, we have referred the Planning Authority to other documentation and drawings submitted with this planning application.

## 2.0 RESPONSE TO LRD OPINION

### 2.1 Response to Areas outlined as reasoning for documentation submitted not deemed to constitute a reasonable basis on which to make an application LRD.

We note that the Planning Authority is of the opinion the documents submitted do Not constitute a reasonable basis on which to make the application in respect of the following areas:

1. Massing and clarity of approach regards any Separation and/or Interface of Development from/to 'Dublin Eastern Bypass' Reservation Corridor: Clear rationale, and drawings, should be provided including at plan, site layout, and section level which outlines the proposed development in relation to the 'Dublin Eastern Bypass' reservation corridor, as delineated in Dún Laoghaire-Rathdown County Development Plan, 2022-2028. It should be noted that alternative uses for corridor are being pursued pursuant to Specific Local Objective 4 of the County Development Plan. It may be prudent to consider pedestrian and cycle linkages to and through this corridor, which should be considered in the design of the scheme's layout, and in the configuration of draft taking in charge drawings, which should be submitted with any application. Note any mapping should be up-to-date including existing new development such as the related Phase 1 Knockrabo scheme to the east, and e.g. Ardilea Crescent etc. to the north.
2. Block 'E' Impacts on Receiving Context: It is considered that insufficient evidence has been provided in submitted rationale, CGI, elevation, and plan drawings to mitigate significant concerns - regarding proposed Block E and its location, and height/massing, particularly in relation to the most closely adjacent Protected Structure (Gate Lodge, west), and existing landscaping and trees, and proposed replacement trees and landscaping, and also unclear details of passing footpath into main site, and Block E relationship to the Protected Structure of Cedar Mount House. There is also notwithstanding above concerns overall regarding Block E, its largely blank, large facade facing obliquely south towards the main entrance road should also be addressed.

*Strong rationale must be given to support the proposal deviating from previously recommended conditions (particularly Condition 2a) under Ref. ABP-311826-21, which were recommended by the Planning Authority, to address these concerns.*

3. Building Height: The subsequent application should demonstrate through commentary, reports, and drawings how the development complies with the requirements of Urban Development and Building Heights: Guidelines for Planning Authorities (DoHPLG, 2018) and the Building Height Strategy (Appendix 5) of Dún Laoghaire-Rathdown County Development Plan 2022-2028. Commentary should also include justification and any rationale for approach to heights particularly for the

*apartment blocks and adjacent blocks and buildings to south and east, including any interface and views to Cedar Mount House, and from surroundings.*

4. *Compact Settlement Guidelines*: *Robust commentary should be provided demonstrating compliance of the proposed development scheme with the relevant parameters of the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities’ 2024. Where deviation from County Development Plan standards are sought in relation to car parking provision, compliance with the provisions of ‘the Guidelines’ should be thoroughly set out. The site location is considered to fall under the Suburban-Intermediate range (40-150 uph). Noting the submitted details and rationale, including both gross and net figures given, the adjacent Phase 1 figures given, and considerations and constraints on-site including Protected Structures and existing landscaping and overall character of receiving context, and the various building heights and the layout proposed – the proposed densities are considered acceptable (and notwithstanding concerns regarding Block E).”*

#### **Applicant’s Response to Point 1**

In response to Point 1, the strategy regarding the interface with the DEBP Reservation is informed by the constructed Knockrabo Phase 1, and by the existing mature trees within that part of the subject site that adjoins the DEBP Reservation. Proposed dwellings under Phase 2 and permitted/constructed dwellings under Phase 1 have been located outside of root protection zones of existing mature trees. This strategy ensures the public open space of Phases 1 and 2 which adjoins the Dublin Eastern Bypass Reservation (DEBP) are contiguous. The area of public open space at this location is significant, thus allowing for the positioning of taller structures in the area adjoining the public open space. This provides both ease of access for future residents of Blocks F and G, as well as passive surveillance to the public open space from these blocks. OMP have prepared a *Response to LRD Opinion*, which outlines;

*“the lower buildings are located nearer to the neighbouring low-rise housing and the taller buildings are located centrally within the Knockrabo site, as far as possible from the neighbouring low-rise housing. This approach creates a strong urban edge along the northern site boundary with a variety of house, duplexes and apartments, which addresses the DEBP Reservation.”*

Moreover, the proposal seeks to provide both pedestrian and cycle access to the DEBP via the contiguous open space of Phases 1 and 2. It is noted that 1 No. pedestrian and cycle access point has been permitted and constructed under Phase 1 and a second access point is similarly proposed for Phase 2. We further note the proposed potential future pedestrian access connection point located in the northwest corner of the site. The *Response to LRD Opinion* prepared by OMP outlines;

*“The gates will provide potential pedestrian and cycle access between Knockrabo and the DEBP Reservation and having two gates will provide the choice of utilising one or both gates to facilitate permeability between Knockrabo, the DEBP Reservation and Ardilea Crescent, once a layout and use(s) for the DEBP Reservation are determined.”*

We note that OMP have prepared an updated site plan and additional site section, showing proposed access gate to DEBP and context of proposed development and DEBP respectively, as well as a Taking in Charge Plan (all incorporating up to date mapping). Please refer to the drawing pack and Response to LRD Opinion prepared by OMP for further information.

### **Applicant's Response to Point 2**

In response to Point 2, it is noted that Block E as proposed as part of this application, is identical to the Block E permitted by An Bord Pleanála under ABP-311826. Considerable detail in relation to Block E, including design strategy, CGIs of the block, and a complete set of plans, elevations and sections are included as part of this application, as noted by OMP. The Response to LRD Opinion from OMP notes;

*“With regard to the facades of Block E, we note that each elevation contains an array of generous windows, providing passive supervision and activity on all sides. Whilst there are some areas of solid masonry on each of the north, south and west facades, these areas provide for a balance between windows and masonry within the overall composition. This is an elevational strategy that has been used successfully on the existing apartment Blocks in Phase 1 of Knockrabo.”*

Please refer to the architectural pack, Design Statement and Response to LRD Opinion prepared by OMP for further information.

In respect of the effects on the receiving environment, we note that the Gate Lodge (west) will benefit from a new sensitively designed extension. We note that proposed works to the Gate Lodge are identical to that which were permitted under DLRCC Reg. Ref. D17A/1124 and assessed as part of the permitted ABP-311826 (i.e. the relationship between the two buildings has been assessed before and permitted by An Bord Pleanála).

The *Response to LRD Opinion, Design Statement* and architectural pack prepared by OMP outlines the works proposed to the Gate Lodge in detail, as well the relationship between the proposed Block E and the Gate Lodge. Refer to the architectural pack, Design Statement and Response to LRD Opinion prepared by OMP for further information.

### **Applicant's Response to Point 3**

In response to Point 3, we note that the proposed building heights are compliant with relevant Ministerial Guidelines, including the *Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*. SPPR 1 of the Guidelines is noted, which states;

*“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.”*

The *Response to LRD Opinion* prepared by OMP outlines a comprehensive response to Point 3, having regard to the relevant criteria at the scale of the city/town, scale of

district/neighbourhood/street, and scale of the site/building as set out in the Guidelines. Refer to *the Response to LRD Opinion* prepared by OMP for further information.

In respect to the *Building Height Strategy (Appendix 5) of Dún Laoghaire-Rathdown County Development Plan 2022-202*, we note that Policy Objective BHS 3 Building Height in Residual Suburban Areas of the Development Plan, which states:

*“It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.*

*Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.*

*Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area.”*

The Strategy acknowledges that greater height can be provided on lands where it can be demonstrated that the proposal complies with the criteria outlined in Table 5.1 under Section 5 of Appendix 5, Building Height Strategy.

The proposed development is assessed against the ‘Performance Based Criteria’ outlined in Table 5.1 of the Building Height Strategy in the table below.

<b>Compliance for All Such Proposals</b>	<b>DM Requirement (where relevant)</b>	<b>Scheme Compliance with Criteria</b>
<b>At County Level</b>		
Proposal assists in securing objectives of the NPF, in terms of focusing development in key urban centres, fulfilling targets in relation to brownfield, infill development and delivering compact growth.		The subject site is located within an existing built-up area, its development contributes to the compact development of Dublin. The site is also an infill site, close to high frequency public transportation and is zoned for residential development.
Site must be well served by public transport – i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route - with high capacity, frequent service and good links to other modes of public transport.		With respect to public transport the site is within 1.5km of Luas green line stops at both Kilmacud and Dundrum. A number of bus stops and services are identified in the <i>Public Transport Capacity Analysis</i> prepared by Waterman Moylan, including stops on Mount Anville Road (within 2-3 minute



		walk) and Goatstown Road (within an 7 minute walk of the site).
<p>Proposal must successfully integrate into/enhance the character and public realm of the area, having regard to topography, cultural context, setting of key landmarks. In relation to character and public realm the proposal may enclose a street or cross roads or public transport interchange to the benefit of the legibility, appearance or character of the area.</p>	<p>Landscape and visual assessment by suitably qualified practitioner. Urban Design Statement. Street Design Audit (DMURS 2019).</p>	<p>Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects.</p> <p>The proposed development has been designed in response to the site's characteristics and context; as an infill site with 2 No. protected structures.</p> <p>The scheme successfully integrates into the area, it utilises the topography of the site which is lower than some of the adjoining sites. The site layout has had regard to the setting of Cedar Mount House and has preserved a formal open space in front of the house and provided glimpsed views of the house from Mount Anville Road. A significant quantum of mature trees are also retained where possible. Refer to LVIA prepared by Modelworks for further information.</p> <p>We note the proposed development is fully compliant with DMURS, and has been designed so as to ensure pedestrian priority and safety, whilst retaining and enhancing the character of the existing protected structures through the retention of significant open space and existing mature trees in these areas (particularly in the curtilage of Cedar Mount House).</p>
<p>Protected Views and Prospects: Proposals should not adversely affect the skyline, or detract from key elements within the view whether in foreground, middle ground or background. A proposal may frame an important view.</p>		<p>The subject site is not included in any protected views or prospects identified in Development Plan Maps.</p>
<p>Infrastructural carrying capacity of area as set out in Core Strategy of CDP, relevant Urban Framework Plan or Local Area Plan.</p>		<p>The subject site is located within a serviced urban area, and the existing infrastructure is in place to cater to the proposed development.</p>



At District/Neighbourhood/Street Level		
<p>Proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape.</p>	<p>Proposal should demonstrate compliance with the 12 criteria as set out in <i>Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities, 2009</i>. Street Design Audit (DMURS 2019).</p>	<p>Please refer to the accompanying <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects for compliance with the 12 criteria set out in <i>Sustainable Residential Development in Urban areas, Guidelines for Planning Authorities 2009</i>, which demonstrates that the proposed development responds to its natural and built environment.</p> <p>The scheme will contribute to the neighbourhood and streetscape by incorporating public access to the open space and the Protected Structures. The proposed development is fully compliant with DMURS, ensuring pedestrian priority and safety, whilst retaining and enhancing the character of the existing protected structures through the retention of significant open space and existing mature trees.</p>
<p>Proposal should not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks.</p>	<p>Design Statement.</p>	<p>Please refer to the accompanying <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects. Materials and textures are used to breakup the facades of the proposed new buildings.</p>
<p>Proposal must show use of high quality, well considered materials.</p>	<p>Design Statement. Building Life Cycle Report.</p>	<p>Please refer to the accompanying <i>Design Statement</i> and <i>Response to LRD Opinion</i> prepared by OMP Architects. Materials selected are high-quality and durable.</p> <p>Refer to Building Lifecycle Report prepared by Aramark for further information, including information on maintenance of structures and materials to ensure envisaged lifespans are achieved.</p>
<p>Proposal where relevant must enhance urban design context for public spaces and key thoroughfares and marine or river/stream frontage.</p>	<p>Must also meet the requirements of “<i>The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009</i>”.</p>	<p>The proposed development does not adjoin any public spaces or key thoroughfares; however, it does provide access to a previously private site, including new public open spaces.</p> <p>The proposal has been subject to a Flood Risk Assessment prepared by Waterman Moylan which concludes “<i>the residual risk of flooding from any source is low.</i>” Therefore the proposals are in line with the requirements of the Planning System and Flood Risk</p>

		Management Guidelines for Planning Authorities 2009.
Proposal must make a positive contribution to the improvement of legibility through the site or wider urban area. Where the building meets the street, public realm should be improved.		The proposed buildings do not adjoin the public street.  However, the proposal will result in the site being opened to public access, and community uses/facilities for the residents of Knockrabo.
Proposal must positively contribute to the mix of uses and /or building/dwelling typologies available in the area.	Design Statement.	Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects. The proposed development introduces a residential scheme providing 158 No. additional units (including 146 No. apartment and duplex units) in a part of the city primarily characterised by large, traditional family homes.  The scheme also provides a Childcare Facility which will be open to the public.
Proposal should provide an appropriate level of enclosure of streets or spaces.	Design Statement.	Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects and the Landscape Design Statement prepared by DFLA. The relationship between the existing and proposed buildings and internal streets has been carefully considered in the design of the scheme.
Proposal should be of an urban grain that allows meaningful human contact between all levels of buildings and the street or spaces.		The proposed development provides for a housing and apartment scheme within an existing mature landscape, the positive attributes of the site, particularly mature trees, are retained and reinforced. Landscaping is designed to encourage active engagement with the different character areas, including the more formal central open space, more natural peripheral walks. The public Childcare Facility and the Residents Internal Amenity spaces are distributed throughout the site to encourage access.
Proposal must make a positive contribution to the character and identity of the neighbourhood.		The proposed development will open the site up to public access, allowing the public to enjoy the setting of Cedar Mount, a Protected Structure.



<p>Proposal must respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.</p>		<p>The design considers the adjoining developments, with the scale of the buildings decreasing where they are closest to the boundaries. Mature boundary planting is retained where possible to mitigate impacts.</p>
<p><b>At Site/Building Scale</b></p>		
<p>Proposed design should maximise access to natural daylight, ventilation and views and minimise overshadowing.</p>	<p>Must address impact on adjoining properties/spaces</p>	<p>Please refer to the accompanying <i>Daylight Sunlight and Overshadowing Report</i> prepared by IES Consulting Engineers.</p>
<p>Proposal should demonstrate how it complies with quantitative performance standards on daylight and sunlight as set out in BRE guidance "Site Layout Planning for Daylight and Sunlight" (2nd Edition). Where a proposal does not meet all the requirements, this must be clearly identified and the rationale for any alternative, compensatory design solutions must be set out. On relatively unconstrained sites requirements should be met.</p>		<p>Please refer to the accompanying <i>Daylight Sunlight and Overshadowing Assessment</i> prepared by IES Consulting Engineers. The assessment takes account of the trees to be retained to provide a conservative assessment. In summary the assessment concludes:</p> <p><i>"the proposed development performs well when compared to the recommendations in the BRE Guide 3rd Edition and BS EN 17037-2018+A1-2021 National Annex. With regards to the existing properties there is a negligible impact when considering sunlight and daylight as a result of the proposed development and the proposed development itself performs very well with the same regard."</i></p>

<p>Proposal should ensure no significant adverse impact on adjoining properties by way of overlooking overbearing and/or overshadowing.</p>		<p>Please refer to the accompanying <i>Daylight, Sunlight and Overshadowing Assessment</i> prepared by IES. The proposed development will not result in any significant loss of daylight or sunlight received by the existing neighbouring properties, as only a small number of windows are affected with the proposed development in place, with 94% of tested receptors achieving compliance with BRE Guidelines (the accompanying <i>Daylight, Sunlight and Overshadowing Assessment</i> refers). Moreover, we note daylight/sunlight to existing blocks within Phase 1 is fully compliant with BSEN Standards, as outlined in the <i>Daylight, Sunlight and Overshadowing Assessment</i> prepared by IES.</p> <p>Moreover, the proposed development will provide for public open space (30.6%) which is larger than the area required under the Development Plan and public amenities (community use and childcare facility), which will facilitate public access to this site which has heretofore always been in private ownership.</p> <p>Furthermore, the <i>Design Statement</i> prepared by OMP Architects explains how the scheme avoids overlooking and overbearing impacts.</p>
<p>Proposal should not negatively impact on an Architectural Conservation Area (ACA) or the setting of a protected structure.</p>		<p>Please refer to the accompanying <i>Report on the Architectural/Historical Significance</i> prepared by Slattery Conservation Architects, in summary it is considered that the '<i>proposed development will enhance the Protected Structures within the site</i>'.</p>
<p><b>County Specific Criteria</b></p>		
<p>Having regard to the County's outstanding architectural heritage which is located along the coast, where increased height and/or taller buildings are proposed within the Coastal area from Booterstown to Dalkey the proposal should protect the particular character of the coastline. Any such proposals should relate to the existing coastal towns and villages as opposed to the coastal corridor.</p>	<p>An urban design study and visual impact assessment study should be submitted and should address where appropriate views from the sea and/or piers.</p>	<p>Please refer to the accompanying and <i>Design Statement</i> prepared by OMP Architects.</p> <p>The site is located away from the coast and does not impede any of preserved/protected views.</p>

<p>Having regard to the high-quality mountain foothill landscape that characterises parts of the County any proposals for increased heights and/or taller building in this area should ensure appropriate scale, height and massing so as to avoid being obtrusive.</p>	<p>An urban design study and visual impact assessment study should be submitted.</p>	<p>Please refer to the accompanying <i>Design Statement</i> prepared by OMP Architects. The site is not located within the mountain foothill landscape and no associated impact will arise.</p>
<p>Additional specific requirements (Applications are advised that requirement for same should be teased out at pre planning stage).</p>		<p>The Planning Authority did not request any specific additional requirements at S247 Stage. Additional information requested within the LRD Opinion issued by DLRC subsequent to the S32B Meeting has been provided as part of this application. Refer to the Response to Statement of Consistency prepared by TPA for further information.</p>
<p>Specific assessments such as assessment of microclimatic impacts such as down draft.</p>		<p>It is not expected that negative micro climatic impacts will be experienced within the development given the extent of the blocks and the proposed layout of the site.</p>
<p>Potential interaction of building, materials and lighting on flight lines in locations in proximity to sensitive bird/bat areas.</p>		<p>The impact of the proposed development on birds and bats has been assessed in the Ecological Impact Assessment prepared by Altamar accompanying this application. The Ecological Impact Assessment states that the proposed development would not be expected to represent a significant collision risk to wintering birds. The impact of artificial lighting on bats at the Site has been assessed in the EcIA and public lighting plan accompanying this application. We refer to the Ecological Impact Assessment Report for further details.</p>
<p>Assessment that the proposals allows for the retention of telecommunications channels, such as microwave links.</p>		<p>The proposed development is not anticipated to have any impact on telecommunication channels or microwave links due to its location and the heights proposed which range from 2 to 8 storeys.</p>
<p>An assessment that the proposal maintains safe air navigation.</p>		<p>The application site is not located in proximity to any airports or airfields and the proposed development is of a similar scale to that previously permitted on the adjoining Phase 1 lands and impact of air navigation was not identified as an issue previously. The tallest proposed building is 8 No. storeys, which is not high enough to impact on safe air navigation.</p>



<p>Relevant environmental assessment requirements, including SEA, EIA (schedule 7 information if required), AA and Ecological Impact Assessment, as appropriate.</p>		<p>An AA Screening is provided with this Submission, this identifies mitigation measures in order to avoid adverse impacts on Natura 2000 sites. An Ecological Impact Assessment has also been prepared by Altemar and is enclosed with the application.</p>
<p>Additional criteria for larger redevelopment sites with taller buildings.</p>		<p>The proposed development of the site has been comprehensively considered through the proposed design.</p> <p>The design of the scheme has regard to the Protected Structure and mature landscaping.</p>
<p>Proposal should make a positive contribution to place making, incorporating new streets where appropriate, using massing and height to achieve densities but with variety and scale and form to respond to scale of adjoining development.</p>		<p>The proposed development provides for new public open spaces in this previously private residential site, which will result in new destination spaces in the locality.</p> <p>The scheme has sought to preserve the character of the existing protected structures through their re-use, ensuring minimal interventions and uses which respect their character.</p> <p>Please refer to the accompanying and <i>Design Statement</i> prepared by OMP Architects which demonstrates how the scale, massing and form of the proposals positively contribute to placemaking and are sensitive to the scale of adjoining development.</p>
<p>For larger unconstrained redevelopment sites BRE standard for daylight and sunlight/any forthcoming EU standards on daylight sunlight should be met.</p>		<p>Whilst the subject site is large at 2.54 ha in area, it is a constrained site due to the need to preserve trees where possible and the need to retain Cedar Mount House (Protected Structure) and the associated historic buildings.</p> <p>The enclosed <i>Daylight Sunlight and Overshadowing Assessment</i> prepared by IES demonstrates that the scheme largely meets the BRE targets for sunlight and daylight and where the worst case receptors (across the lowest 3 Levels of accommodation) were assessed against the emerging new standards (in this case EN 17037:2018: <i>Daylighting in Buildings</i> which has been published with a British annex BS EN 17037:2018, which includes further detail on the analysis criteria.</p>

The proposed new development ranges between 2 and 8 storeys in height. In our opinion, allowing for the location of the site, quality of the design and the supporting assessments, the maximum height proposed of 8 storeys is permissible at the site.

In our opinion, the proposed design strategy, and importantly, the building height strategy, responds to the immediate setting of the Protected Structures through separation distances and reduction in height. Similarly, the proposed building height strategy has been designed to mitigate significant adverse impact upon neighbouring amenity, with the height tapering from 8 storeys to 2 and 3 storeys (including setbacks) towards the boundaries of the site where the development is closer to existing residential dwellings.

#### **Applicant's Response to Point 4**

It is noted that the Planning Authority considers the proposed densities acceptable. The development will provide 130 No. car parking spaces consisting of 117 No. residential spaces (comprising 54 No. at podium level, 63 No. on-street and on curtilage spaces, 6 No. visitor spaces and 2 No. on-street car sharing spaces) and 5 No. non-residential spaces. The proposed rate of car parking provision deviates from the standards of the County Development Plan (CDP). Where the CDP seeks a car parking rate of 1 No. spaces per unit for 1 or 2 bed units, and 2 No. spaces per unit for 3+ bed units (houses and apartments), it is noted that the proposed scheme provides a residential car parking rate of 0.74 No. spaces per unit, excluding visitor and car-sharing spaces.

We note, as per the LRD Opinion issued by DLRCC, that the subject site is deemed to fall within the Suburban/Urban Extension area and is also deemed to be an intermediate location (*Suburban-Intermediate* as per LRD Opinion). Intermediate locations are defined as follows under the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*;

- *Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and*
- *Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequency (minimum 15 minute peak hour frequency) urban bus service.*

With respect to public transport the site is within 1.5km of Luas green line stops at both Kilmacud and Dundrum. A number of bus stops and services are identified in the *Public Transport Capacity Analysis* prepared by Waterman Moylan, as follows:

#### **Mount Anville Road**

Route S6 is an orbital route operating at a frequency of 15 minutes in both directions between Old Bawn Centre in Tallaght and Blackrock DART Station via Nutgrove Retail Park and the UCD Campus at Belfield. Route S6 operates along Mount Anville Road, to the front entrance of the subject site, with both directions located within 2 -3-minute walk from the subject site.

#### **Goatstown Road**

Route 11 is City Bound route serving The Goat public house and surrounding area and operating at a frequency of 15 - 20 minutes in both directions between Sandyford Business Park and Wadelai Park via Ranelagh and O'Connell Street. Stops for both directions are located within an 7-minute walk from the subject site.

### Eden Park Road

Route L25 is a local route operating along Eden Park Road to the south of the subject site at a frequency of 20 minutes in both directions between Dundrum Luas and Dun Laoghaire DART Park via Stillorgan Village. Stops for Route L25 in both directions are located within a 17 - 18-minute walk from the subject site.

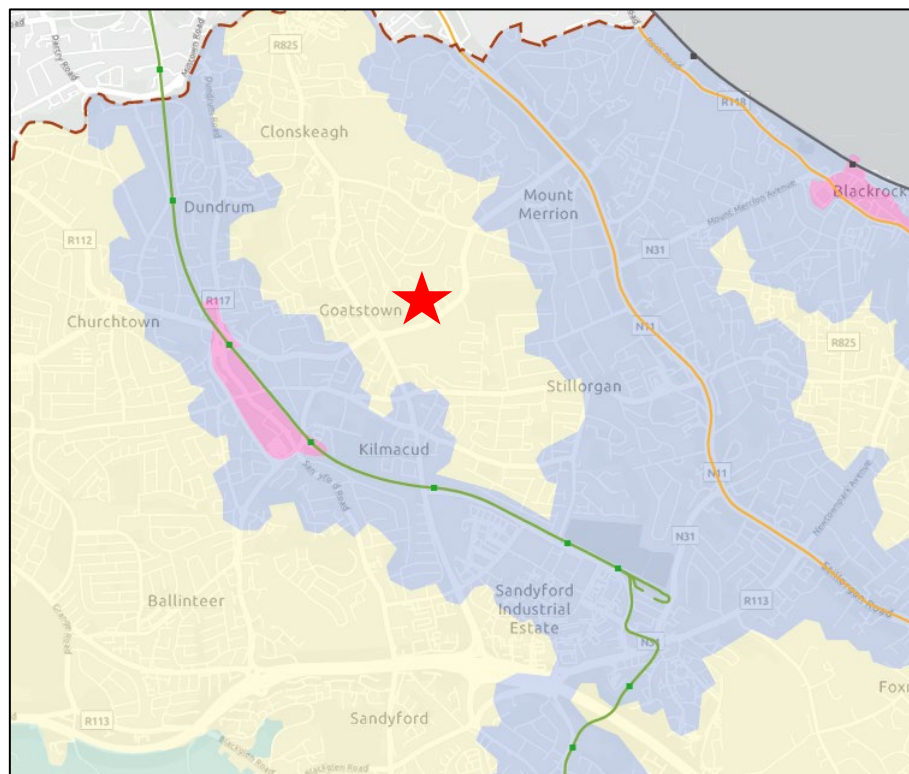
The subject site is proximate to a significant quantum of existing bus stops and bus routes. We consider that the subject site has been correctly identified as an intermediate location in this regard. Please refer to the *Public Transport Capacity Analysis* prepared by Waterman Moylan for further information on the proximity of high frequency public transport.

The DLRC Development Plan 2022-2028 outlines the following car parking standards for residential uses within Car Parking Zone 3 (the subject site is located within Car Parking Zone 3 – figure 2.1 refers).

Land Use	Zone 3 Car Parking Standard
House 1 bed	1
House 2 bed	1
House 3 bed or more	2
Apartment 1 bed	1*
Apartment 2 bed	1*
Apartment 3 bed +	2*

**Table 2.1:** Residential Car Parking Standards – Car Parking Zone 3. (Source: DLRC Development Plan 2022-2028. Formatted by TPA, 2024).

*\*plus 1 in 10 visitor parking for apartments in zone 3*



**Figure 2.1:** Location of subject site within Car Parking Zone 3 – site indicatively marked with red star. (Source. DLRC Development Plan 2022-2028, cropped and annotated by TPA, 2024).



Section 12.4.5.1 of the Development Plan provides that reduced provision may be acceptable in zone 3 within infill sites. In addition, Section 12.4.5.2(i) of the Development Plan provides for flexibility in relation to the application of car parking standards in car parking Zone 3. Reduced car parking provision is acceptable subject to *inter alia* proximity to public transport services, walking and cycling accessibility/permeability and any improvement to same, the need to safeguard investment in sustainable transport and encourage a modal shift, availability of car sharing and bike / e-bike sharing facilities.

2 No. car-sharing spaces are proposed within the scheme together with 366 No. bicycle parking spaces to encourage residents to choose more sustainable means of transport.

We further note SPPR 3 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, particularly relating to intermediate and peripheral locations;

*“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”.*

We highlight that this car parking ratio is identified as a maximum rate. Moreover, the subject site is deemed as an intermediate location proximate to existing high frequency/urban bus services. In this regard, we also note Section 5.3.4 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*;

*“In areas where car-parking levels are reduced studies show that people are more likely to walk, cycle, or choose public transport for daily travel... Car parking ratios should be reduced at all urban locations, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport.”*

Given that the indicative parking ratio for intermediate locations is a maximum ratio, and having regard to the proximity of the subject site to existing high frequency/urban bus services, it is considered that the proposed car parking ratio of 0.74 is appropriate for the subject development. Moreover, we note that the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* seek to reduce car parking ratio at all urban locations that have good access to urban services and public transport. We note that proximity of the subject site to public transport (bus services) and also highlight that the subject site is within 1.5km of Dundrum, offering a range of services to future residents of the scheme. The subject site will also have a range of services including, inter alia, primary and post primary schools, range of services within Goatstown village, as well as UCD.

Furthermore, Waterman Moylan have prepared a *Public Transport Capacity Analysis* in respect of the public transport network surrounding the proposed development site. This Analysis concludes;

*“the capacity of the existing public transport services has been demonstrated to be more than adequate to cater for existing demand and from future demand from residents living in the proposed development.”*

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* seek to reduce the provision of car parking where possible, and in this regard we note the capacity of existing public transport is sufficient to absorb any additional demand from the subject site, having regard to the proposed car parking ratio of 0.74 No. spaces per unit. The proposed development is considered appropriate in the context of SPPR 3 and the overall guidance set down in the Compact Settlement Guidelines, 2024, and the Development Plan given that a reduction on the maximum requirements is acceptable in the context of the site's location, the provision of car sharing spaces, and the number of bicycle parking spaces provided within the scheme.

Commentary on remaining SPPR's of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* are provided below.

### **SPPR 1 – Separation Distances**

*“It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

*There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.*

*In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.”*

The proposed development has been designed to maximise the separation distances between the subject scheme and adjoining properties to the south. In this context, separation distances in excess of 16m are provided throughout. Refer to the architectural pack prepared by OMP Architects for further information. The proposed development is fully compliant with SPPR 1 of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*.

### **SPPR 2 – Minimum Private Open Space for Houses**

The Guidelines outline minimum private open space standards for houses, as follows;

House Type	Minimum Private Open Space Standard
1 bed house	20 sqm
2 bed house	30 sqm
3 bed house	40 sqm
4+ bed house	50 sqm

**Table 3.2:** Minimum Private Open Space Standards for Houses (Source: Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024)

The house units within the proposed development will accord in full with the minimum private open space standards for houses, as per the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities. Apartment Units are fully compliant with the private open space standards of the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023)*. Refer to the Housing Quality Assessment and architectural pack prepared by OMP Architects for further information.

### **SPPR 4 – Cycle Parking and Storage**

The Guidelines outline that safe and secure cycle storage facilities are required to meet the needs of residents and visitors. In this regard, the Guidelines note;

*“Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual locker.*

*Design – cycle storage facilities should be provided in a dedicated facility of permanent construction within the building footprint or, where feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”*

Secure cycle storage is proposed to be provided, to ensure safe and secure storage for residents and visitors. Locations for secure cycle storage will be conveniently located for residents. Throughout the scheme, 366 No. cycle parking spaces are proposed, inclusive of 288 No. long term spaces, 70 No. short term spaces, as well as 8 No. long stay spaces to serve the proposed childcare facility, and community hub. Refer to the architectural pack and Schedule of Accommodation prepared by OMP Architects for further information.

A *Cycle Audit* has also been prepared by Roadplan Consulting (included within the *Road Safety Audit* also prepared by Roadplan Consulting). Refer to the *Quality Audit* prepared by Roadplan Consulting, appended to the *Engineering Assessment Report* prepared by Waterman Moylan, for further information.

## 2.2 Item 1 – Materials and Finishes

Item 1 states:

*“A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the 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 2 no. Protected Structures within the scheme, having regard to the findings of ‘Architectural/Historic Significance of the Knockrabo Site and Setting, Mount Anville Road, Dublin 14 & Observations on the Impact of the Current Proposal’, prepared by David Slattery, dated June 2024, and also noting the previous commentary of Conservation Planning, and further noting need for justification and/ or rationale for mix, variation or otherwise of external finishes between Protected Structures and any relevant similar heritage structure(s) to each other, and the proposed new-build development apartments and houses to each other and to the character relationship and any variations to the existing recent development. Notwithstanding limited scope for building line variation within 3no. terraces of houses, some commentary etc should be included regarding any potential for small steps in building lines, bookend/ roof change variations or similar.*

*The requirements of Policy Objectives HER8 Work to Protected Structures; HER9 Protected Structures Applications and Documentation; HER10 Protected Structures and Building Regulations; HER20 Buildings of Vernacular and Heritage Interest; and HER21 Nineteenth and Twentieth Century Buildings, Estates and Features of Dún Laoghaire-Rathdown County Development Plan 2022-2028 shall also be strictly adhered to.”*

### 2.2.1 Applicant’s Response to Item No. 1

In response to Item 1, we note that the proposed apartment blocks carry through the material palette of the Phase 1 development as constructed, with the proposed development utilising a combination of red and white brick to predominant facades and limited use of grey metal cladding to penthouses and recesses.

Moreover, we note that works to Cedar Mount and the Gate Lodge (west) are identical to those that were permitted under D17A/1124 (as designed by Howley Hayes Conservation Architects). The Response to LRD Opinion prepared by OMP notes;

*“In all three buildings, the designs have been carefully considered to clearly distinguish between historic fabric and contemporary interventions, in line with conservation best practice. The palette of proposed materials is illustrated above, and is identical to those that were permitted under D17A/1124.*

*The restoration of Cedar Mount will maintain the historic character of the house in its principal setting as viewed from the south, while the recladding of the north wing will produce a contemporary design of high quality.*

*The renovation of the gate lodge (west) & the coach house... provides a more viable and sensitive use of these structures with well-designed contemporary additions that are complementary yet subservient."*

In relation to proposed materials and finishes for terraces (duplexes and houses) we note that OMP have revised the main façade (south façade) of the 2A/3C simplex/duplex units, and the north facing façade of the 3A/3B duplexes. The revisions include additional brickwork detailing to the large upper floor windows on both facades, with a recessed side and head panel, and stacked soldier courses within the recess.

Refer to the architectural pack and Response to LRD Opinion prepared by OMP, and the revised CGI's by Modelworks for further information.

Furthermore, we note Item 1 states;

*"Notwithstanding limited scope for building line variation within 3 no. terraces of houses, some commentary etc should be included regarding any potential for small steps in building lines, bookend/roof change variations or similar."*

The Response to LRD Opinion prepared by OMP notes;

*"The 2A/3C simplex/duplexes are three storey - although from their northern side, they appear to be 2.5 storeys due to the sloping nature of the site. The terrace is aligned with the contours of the site, and therefore has the same floor levels throughout. On the northern side of the terrace, the projecting stairs and the low, white brick walls of the bin/ bicycle stores provide a contrast in materiality and a change in scale within the streetscape. On the southern side of the terrace, the building line is broken by the projecting single storey volume of the living room simplexes. These projections provide variety in both scale and materiality.*

*The 3A/3B duplexes are four storey - although from their southern side, they appear to be 3 storeys due to the sloping nature of the site. The terrace is aligned with the contours of the site, and therefore has the same floor levels throughout. On the northern side of the terrace, the projecting porches, finished in white brick, break the building line and provide variety in scale. On the southern side of the terrace, the projection that contains the kitchen & an entrance door breaks the building line, and provides variation in scale and materiality. In both terraces of duplexes, the end-or-terrace units maintain the same building line, but the units are triple aspect, and benefit from additional windows to hallways and habitable rooms. The additional gable windows provide animation to these facades.*

Refer to the architectural pack and Response to LRD Opinion prepared by OMP for further information.

Finally, we note the *Architectural/Historic Significance of the Knockrabo Site and Setting*, prepared by Slattery Conservation Architects, which concludes;

*“The proposed development will enhance the Protected Structures within the site: Cedar Mount House, the Coach House within the curtilage of Cedar Mount House and Knockrabo Gate Lodge (west) by providing a new use and appropriate setting to those structures”.*

Moreover, proposed materials for the protected structures represent carefully selected, sensitive materials which will complement and enhance the protected structures and their curtilage. The development is fully compliant with the relevant heritage policies of the Development Plan, including HER8, HER9, HER10, HER20, and HER21.

Refer to the *Architectural/Historic Significance of the Knockrabo Site and Setting* prepared by Slattery Conservation Architects for further information.

### **2.3 Item 2 – Management and Maintenance of Apartments/Life Cycle Report**

Item 2 states:

*“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 the Sustainable Urban Housing: Design Standards for New Apartments (2023).”*

#### **2.3.1 Applicant’s Response to Item No. 2**

In response to **Item 2**, we refer the Council to the *Building Lifecycle Report* and *Property Management Strategy Report* prepared by Aramark. The design of the proposed development has had regard to the *Building Lifecycle Report*, particularly in regard to the selection of high quality and durable materials. A comprehensive maintenance schedule is also included within the *Building Lifecycle Report* in order to ensure the envisaged lifetime selected materials can be achieved.

As per the *Building Lifecycle Report* included with this application, selected materials will provide a high standard of living and amenity for future residents of the scheme. Moreover, materials have been selected to integrate successfully with the as constructed Phase 1, while also being sensitive to the existing protected structures on site.

The *Property Management Strategy Report* outlines the management policies/principles of the scheme once occupied by residents, including, *inter alia*, the management of open spaces, car parking, and waste areas. Furthermore, the *Property Management Strategy Report* seeks to ensure the health and safety of users and future residents of the scheme.

Refer to the *Building Lifecycle Report* and *Property Management Strategy Report* prepared by Aramark for further information.

## 2.4 Item 3 – Contextual Drawings

Item 3 states:

*“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.”*

### 2.4.1 Applicant’s Response to Item No. 3

Please refer to architectural pack prepared by OMP and CGI’s prepared by Modelworks for information on Item 3. We note that winter views have not been provided owing to the inability to model/undertake such views at this time of year. Refer to the architectural pack prepared by OMP and the CGI’s and verified views prepared by Modelworks for further information.

## 2.5 Item 4 – Housing Quality Assessment

Item 4 states:

*“A Housing Quality Assessment (HQA) 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 apartments comply with the various requirements of the Development Plan and the guidelines.”*

### 2.5.1 Applicant’s Response to Item No. 4

In response to **Item 4**, we note that a Housing Quality Assessment, in respect of both proposed apartment units and proposed housing units have been prepared by OMP. The HQA’s outline compliance of the proposed scheme with the *Dun Laoghaire County Development Plan 2022-2028* and the *Sustainable Urban Housing: Design Standards for New Apartments (2022)*. In particular, we note that the proposed development is fully compliant with the SPPR’s of the *Apartment Guidelines*;

- 80% of proposed apartments exceed the minimum area requirement by at least 10%, and minimum apartment areas are achieved or exceeded for all remaining units;
- 68.8% of proposed apartment units (comprising apartment and duplex units) achieve dual aspect, in excess of the requirement as per the *Apartment Guidelines*;
- Proposed ground level apartment floor to ceiling heights are a minimum of 2.7m, in compliance with the *Apartment Guidelines*;
- The proposal does not provide more than 12 apartments per floor per core, also in accordance with the Guidelines.

Refer to the HQA for apartment units and HQA for housing units (Dwg. No. 1307G-OMP-XX-XX-HQA-A-6000 and Dwg. No. 1307G-OMP-XX-XX-HQA-A-6001 respectively) as well as the Design Statement prepared by OMP for further information.

## 2.6 Item 5 – Building Lifecycle Report

Item 5 states:

*“A Building Lifecycle Report”.*

### 2.6.1 Applicant’s Response to Item No. 5

In response to **Item 5**, we note a *Building Lifecycle Report* has been prepared by Aramark in respect of the proposed development. Refer to the *Building Lifecycle Report* prepared by Aramark, as well as our response to Item 2 above for further information.

## 2.7 Item 6 – Management of the Scheme

Item 6 states:

*“Details regarding the long-term management of both the apartment development, and non-residential development (e.g. community hub and creche) and its communal facilities.”*

### 2.7.1 Applicant’s Response to Item No. 6

In response to **Item 6** we refer the Council to the *Property Management Strategy Report* prepared by Aramark, as well as our response to Item 2 above.

The *Property Management Strategy Report* outlines the management policies/principles of the scheme once occupied by residents, including, *inter alia*, the management of open spaces, car parking, and waste areas. The *Property Management Strategy Report* seeks to ensure the health and safety of users and future residents of the scheme.

Refer to the *Property Management Strategy Report* prepared by Aramark for further information.

## 2.8 Item 7 – Traffic and Transport Assessment

Item 7 states:

*“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.*

*Details of pedestrian/ cycle links (or any lack thereof) to the surrounding areas and sites should also be given, inclusive of any potential links in the short, or long-term with the DEBP to the north.”*

### 2.8.1 Applicant’s Response to Item No. 7

A *Traffic and Transport Assessment (TTA)* has been prepared by Waterman Moylan in respect of the proposed development. The TTA gives a review of all the potential transport impacts of the overall development and the potential for an impact of the overall development on the



surrounding environment and transportation network. The TTA includes details of car parking management and car share schemes. A separate *Travel Plan* has also been prepared by Waterman Moylan.

In this regard, we note that a *Travel Plan* (to encourage a modal shift to more sustainable modes of transport) and a *Public Transport Capacity Analysis* (which outlines the current capacity and capability of existing public transport modes to meet the additional demand associated with the proposal) have also been prepared by Waterman Moylan in respect of the proposed development.

Refer also to Point 4 above, which outlines a detailed rationale for the proposed car parking ratio of 0.74. In summary, it is noted that car parking requirements as per the Development Plan and the Compact Settlement Guidelines are maximum numbers. Moreover, we note a significant quantum of public transport options which are proximate to the site (including bus and Luas) and note the capacity of these public transport options to absorb additional demand from the proposed development (*Public Transport Capacity Analysis* prepared by Waterman Moylan refers). Furthermore, we note the provision of 366 No. bicycle parking spaces (comprising long stay and short stay spaces) to serve residents and visitors of the scheme.

The TTA and *Public Transport Capacity Analysis* include details of the pedestrian and cycle links proximate to the subject site, and which also provide linkages to existing public transport/public transport routes. The Response to LRD Opinion prepared by OMP also outlines further information on proposed links to the DEBP lands.

Refer to the *Traffic and Transport Assessment* and *Public Transport Capacity Analysis* prepared by Waterman Moylan for further information.

## 2.9 Item 8 – Public Open Space

Item 8 states:

*“A quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc.”*

### 2.9.1 Applicant’s Response to Item No. 8

In response to **Item 8**, we refer Council to the Schedule of Accommodation (Doc. No. 1307G-OMP-SA-XX-XX-A-6004) prepared by OMP and the landscape pack prepared by DFLA. In this regard, we note that 1,323sqm of communal open space has been provided throughout the scheme. The communal open space requirement as per Apartment Guidelines is 982sqm. In this regard we note that proposed communal open space exceeds the requirement by 341sqm.

Moreover, 7,784.5sqm of public open space is proposed as part of the scheme, representing 30.6% of the subject site. The overall Knockrabo lands (Phase 1 and 2) provides for 11,814.3sqm (21.9%) of public open space.

Refer to the landscape pack prepared by DFLA for details on the proposed open spaces, which also provides a qualitative assessment of these spaces. High quality materials will be utilised throughout proposed open spaces. A range of planting is proposed throughout the scheme, while the proposal also seeks to retain a significant quantum of existing mature trees, which provide additional landscape value to the site.

Refer to the Schedule of Accommodation by OMP and landscape pack by DFLA for further information on Item 8.

## 2.10 Item 9 – Surface Water Management

Item 9 states:

*“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.”*

### 2.10.1 Applicant’s Response to Item No. 9

In response to **Item 9**, we note full details of proposed surface water management, including attenuation features and cross sections of all SuDS features, discharge rates equal to greenfield sites, and integration of appropriate phased *works* are included in the engineering pack prepared by Waterman Moylan, with input from DFLA and OMP where relevant (relevant landscaping and architectural layouts refer, please refer to respective landscaping and architectural packs for further information).

Refer to Section 3 of the *Engineering Assessment Report* prepared by Waterman Moylan for full details on surface water drainage. The *Engineering Assessment Report* notes;

*“It is proposed to drain surface water from the development by gravity to the existing public surface water drainage outfall pipe in the north-eastern corner of the development site. Storm water will discharge to the outfall at a controlled rate, limited to the greenfield equivalent runoff. Excess surface water runoff during storm events will be attenuated in new below ground stormwater attenuation tanks within the open space at the northern end of the site, as shown on Waterman Moylan Drainage Layout Drawing No. 20-086- P121-P122. As noted in section 3.4 above, the suitability of the soil for infiltration soakaways has been explored through site investigation, however the ground conditions are not favourable to this means of surface water design. As such, alternative SuDS measures including attenuation tanks are proposed...”*

We note that a *Surface Water Audit* has been prepared by JBA Consulting and is appended to the *Engineering Assessment Report* to be read in conjunction with the Engineering Assessment Report and wider Engineering pack, where relevant.

Refer to the full Engineering pack prepared by Waterman Moylan for full details in relation to surface water management in respect of the proposed development.

## 2.11 Item 10 – Taking in Charge

Item 10 states:

*“Submission of a Taking in Charge (TIC) Map.”*

### 2.11.1 Applicant’s Response to Item No. 10

In response to **Item 10**, a Taken in Charge Plan has been prepared by OMP and is submitted with this application. Refer to Taken in Charge Plan (Dwg. No. 1307G-OMP-00-00-DR-A-1013) prepared by OMP for further information.

## 2.12 Item 11 – Construction Management Plan

Item 11 states:

*“Submission of a Construction Management Plan (CMP) (note also other CMP requests e.g. Transportation Planning, and Environmental Enforcement Planning CMP).”*

### 2.12.1 Applicant’s Response to Item No. 11

In response to Item 11, Waterman Moylan have prepared a *Construction Management Plan* (CMP) in respect of the proposed development. The CMP outlines the relevant construction management practices for the scheme, including relevant environmental controls, management of construction deliveries (including construction traffic routes), hours of operation, construction waste management, and resource waste management.

The CMP has been prepared to ensure any impacts or disturbance to the area/s around the subject site during the construction phase are minimised. Refer to the CMP prepared by Waterman Moylan for further information.

## 2.13 Item 12 – Irish Water Confirmation of Capacity

Item 12 states:

*“A letter from Irish Water (Uisce Eireann) 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.”*

### 2.13.1 Applicant’s Response to Item No. 12

In response to **Item 12**, a Confirmation of Feasibility letter dated 4<sup>th</sup> June 2024, which confirms that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development, has been obtained from Irish Water and is appended to the *Engineering Assessment Report* which accompanies this application. Refer to the *Engineering Assessment Report* prepared by Waterman Moylan for further information.

## 2.14 Item 13 – Transportation

Item 13 states:

*“Information/documentation which address the following Transportation-related issues:*

*Details of proposed surface treatments and road markings should be included in any future submission.*

*Swept path analysis should be submitted which demonstrates all required vehicular movements to and from the site. Accommodations for set-down and service vehicles shall also be clearly outlined.*

*These items should be addressed in any further submission.*

### Required Reports

- a. Detailed reports should be submitted in relation to the following items:*
- b. Mobility Management Plan*
- c. Construction Management Plan including traffic management plan*
- d. Cycle Audit (See Section 12.4.6.1 Paragraph 2 of the current DLRC County Development Plan).”*

### 2.14.1 Applicant’s Response to Item No. 13

In response to **Item 13**, we note that Waterman Moylan have prepared a Road Levels and Layout Plan (Dwg. No. KNB WMC PH2 ZZ DR C-P110) and Vehicle Tracking and Sightlines Plan (Dwg. No. KNB WMC PH2 ZZ DR C-P111) which present details of proposed surface treatments and road markings, and swept paths and sightlines respectively. Accommodation for service vehicles and set down areas are also presented under these drawings.

Furthermore, we note a *Travel Plan* has been prepared by Waterman Moylan in respect of the proposed development (we note the threshold for residential development requires a *Travel Plan* rather than a Mobility Management Plan under Appendix 3 of the DLR Development Plan 2022-2028). The *Travel Plan* outlines the relevant methods to encourage a modal shift from private vehicles to more sustainable modes of transport for trips to and from the subject site. Refer to the *Travel Plan* prepared by Waterman Moylan for further information.

We also note that a *Construction Management Plan* (CMP) has been prepared by Waterman Moylan in respect of the proposed development, including a Construction Traffic Management Plan, which outlines estimated number and time of construction deliveries, as well as a preferred route for construction traffic to and from the subject site. Refer to the CMP prepared by Waterman Moylan for further information.

Finally, a *Cycle Audit* has been prepared by Roadplan Consulting which accompanies the application. The *Cycle Audit* forms part of the *Quality Audit* prepared by Roadplan Consulting.

## 2.15 Item 14 – Drainage

Item 14 states:

*“Information/documentation which address the following concerns/issues of Drainage Planning:*

*SOIL value 4 has been justified for this application. The applicant has proposed an overall flow restriction of 13.4l/s for the entire site, with 750ms of storage required (771m<sup>3</sup> provided). This has not been supported at this stage by hydraulic analysis.*

### Surface Water Drainage

- a. 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.*
- b. 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 EI4: 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.*
- c. The applicant is requested to confirm what the drainage arrangements are for the Gate Lodge West. The applicant should confirm that this area has been removed from the allowable outflow calculation if not included in the positively drained area.*
- d. In the vicinity of Block E, on the “Proposed SuDS Strategy” drawing P140, as well as “Proposed Foul and Storm Water Drainage General Arrangements” Drawing P120, it appears a surface water network (unclear if called up as proposed or existing as drawings conflict) is shown to discharge into a foul network. The foul and surface water should be separate systems.*
- e. Further to the above, the surface water coming from Block E appears to discharge into an existing (or permitted) surface water network on the access road, before coming back into the site and discharging into the attenuation system for this proposed scheme. The applicant is requested to clarify what is the catchment of this network and confirm if this has been accounted for in the storage requirements for the site.*

- f. The applicant has indicated in the body of the Engineering Assessment Report that a SAAR of 881 is appropriate for the site. However within the analysis in Appendix D, a figure 774mm has been used. The applicant is requested to use site specific data for analysis and ensure consistency within the documentation.*
- g. At full application stage, hydraulic simulation results are required for each standard rainfall return event from the 15 minute to 10800 minute event in order to demonstrate the performance of the proposed surface water drainage network for all rainfall events. Site specific data should be used including SAAR and soil type, as well as M5-60. The applicant is requested to comment on any run-off factors proposed (these should be agreed prior to submission) and the correct CV value, as set out in Appendix 7: Sustainable Drainage System Measures of the County Development Plan 2022-2028 should be used.*
- h. As standard, the applicant is requested to ensure that a penstock is provided in the flow control device chambers and that the flow control device provided does not have a bypass door. The applicant shall also ensure a silt trap is being provided in the flow control device chamber.*
- i. As standard, the applicant is requested to show the options being proposed for interception and treatment with contributing areas on a drawing together with an accompanying text and tabular submission showing the calculations, to demonstrate that the entire site is in compliance with GSDS requirements. The applicant should note that over-provision in one location does not compensate for under provision elsewhere. The interception requirements is based on the total positively drained area, rather than the reduced (factored) impermeable area.*
- j. As standard, the applicant is requested to ensure that 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. Where unbound material is proposed for driveway, parking or hardstanding areas, it shall be contained in such a way to ensure that it does not transfer on to the public road or footpath on road safety grounds.*
- k. As standard, the applicant is requested to submit supporting standard details, including cross-sections and long-sections, and commentary that demonstrates that all proposed SuDS measures have been designed in accordance with the recommendations of CIRIA C753 (The SuDS manual).*

- l. 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, as per this draft submission.*
- m. As standard, 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.*
- n. As standard 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.*

Site Specific Flood Risk Assessment

- a. A site specific Flood Risk Assessment should be included in the planning application. In addition, an analysis to determine the impact of a 50% blockage in the surface water drainage system will be required and shall be referenced in the Site Specific Flood Risk Assessment."*

### **2.15.1 Applicant's Response to Item No. 14**

In response to Item 14, it is noted that all surface water drainage proposals will be compliant with the requirements of Appendix 7: Sustainable Drainage System Measures of the County Development Plan 2022-2028, County Development Plan 2022-2028 Section 10.2.2.6 Policy Objective EI4: Sustainable Drainage Systems, and the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS).

The proposed development is compliant with all points requested under Item 14 of the LRD Opinion issued by DLRCC, with respect to surface water drainage. Refer to the engineering pack (reports and drawings) prepared by Waterman Moylan for further information on this surface water drainage.

We also note that a *Flood Risk Assessment* (FRA) has been prepared by Waterman Moylan in respect of the proposed development. The FRA concludes that the residual risk of flooding from any source is low, where proposed mitigation measures are included. Refer to the FRA prepared by Waterman Moylan for further information.

## 2.16 Item 15 – Environmental

Item 15 states:

*“Information/documentation which address the following concerns/issues of Environmental Enforcement Planning:*

*The DLR Environmental Enforcement Department have reviewed the following documentation submitted with the pre-application consultation:*

- *Construction Management Plan*
- *Pre-App Noise Review & Proposed Methodology for a Proposed Large Scale Residential Development at Knockrabo, Goatstown, Dublin 14*
- *Resource & Waste Management Plan for A Proposed Residential Development at “Knockrabo Phase 2”*
- *Operational Waste Management Plan for Residential Development “Knockrabo Phase 2” Assessment:*
- *DLR Environmental Enforcement Department have reviewed the above documentation and would request that the following documentation are supplied in support of any future planning application.*

### *Pre-App Noise Review & Proposed Methodology*

- *Environmental Enforcement are generally satisfied with this report and note that a full detailed assessment will be completed and issued as part of the final planning application submission/*

### *Resource & Waste Management Plan*

- *Environmental Enforcement are generally satisfied with this report and request that a updated report is completed and issued as part of the final planning application submission.*

### *Construction Environmental Management Plan*

- *Environmental Enforcement are generally satisfied with this report that a updated report is completed and issued as part of the final planning application submission.*

### *Operational Waste Management Plan (OWMP)*

- *Environmental Enforcement are generally satisfied with this report and request that a updated report is completed and issued as part of the final planning application submission.”*





### 2.16.1 Applicant's Response to Item No. 15

In response to Item 15, we note comments of the DLRCC Environmental enforcement team in relation to relevant documentation submitted.

We note that the *Noise Impact Assessment*, *Resource Waste Management Plan*, and *Operational Waste Management Plan* prepared by AWN, and the *Construction Management Plan* prepared by Waterman Moylan have generally been completed to the satisfaction of the Environmental Enforcement Team. Each of these inputs has been updated accordingly from the Stage 2 meeting held with DLRCC.

### **3.0 CONCLUSION**

This submission addresses, in full, issues raised by the Planning Authority in the LRD Opinion, dated 12<sup>th</sup> August 2024.

It is submitted that the issues raised in the Planning Authority's LRD Opinion have been fully addressed by this Response, and the accompanying Planning Application. It is considered that the subject proposal accords in full with the Development Plan, and the proper planning and sustainable development of the area.

Yours faithfully,



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**Stephen Barrett**  
**Director**  
**Tom Phillips + Associates**