



Application to An Bord Pleanála

Strategic Housing Development (SHD)  
at Mill Road, Saggart, County Dublin

Response to ABP & SDCC Consultation  
December 2021

## Contents

### Section 1

02-04 Response to ABP Opinion at Pre-Application Stage

### Section 1

05-09 Response to SDCC Opinion at Pre-Application Stage

## Appendix A - Response to ABP & SDCC Pre-Application Consultation Opinions

### An Bord Pleanála Pre-Application Consultation Opinion - Case Reference: ABP-308982-20

#### An Bord Pleanála:

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.

Furthermore, pursuant to article 285(5) (b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

**1. Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.**

*Response:*

*Please refer to the Material Contravention Statement prepared by the Planning Consultant, Manahan Planners.*

**2. Justification, and where appropriate amendment, to demonstrate that surface car parking quantity and location, road hierarchy and layouts, including design and materiality of the proposed shared surfaces, complies with DMURS. To this end, matters raised in the PA submission (dated 1st February 2021), including those comments contained in the internal report from the Transportation Planning Section of South Dublin County Council, should be addressed in any report/ justification relating to the outlined transport issues. Issues to be addressed include but are not limited to the overall quantum of surface car parking, details of existing and proposed pedestrian and cycle links to Saggart, to the nearest Luas stop, and through lands to the east and south of the site, and the proposed provision of an access road in close proximity to that permitted on lands to the south of the site.**

*Response:*

*We have amended the layout to ensure the car parking quantity and location, road hierarchy and layouts, including design and materiality of the proposed shared surfaces, complies with DMURS and best practice. Please refer to compliance reports and Transportation Assessment Report prepared by NRB Consulting Engineers, and forms part of this submission.*

*The allocation of car parking spaces throughout the site is identified and colour coded in section 11.1 of the Architectural Design Statement to illustrate the breakdown of the proposed quantum of spaces for the proposed development.*

*The layout includes direct connectivity to the Saggart Luas stop through the lands and existing development to the east. A pedestrian and cycle route is proposed to connect into the existing road & paths serving the Citywest Hotel & Conference Centre which link to Garter lane just south of the Luas Stop. This route is identified in Darmody Architecture's Proposed Site Plan, PA-001 and the Masterplan Drawing, PA-002.*

*The existing public path abutting the south west boundary of the subject site extends directly into Saggart Village Centre with active bus stops in close proximity to the site entrance – illustrated on Darmody Architecture's Masterplan Drawing, PA-002.*

*The layout also accommodates potential vehicular & pedestrian links to 2no. adjacent undeveloped sites to the North west and south and to the existing Citywest Campus lands to the north east by proposing road & footpaths up to these site boundaries.*

*Additional detail on these linkages are outlined in NRB Consulting Engineers Transportation Assessment Report, and the Landscape Architects, Murrays and Associates, Landscape Masterplan.*

**3. An Integrated Area Plan/Masterplan as required, that considers inter alia proposed and potential links to adjoining sites.**

*Response:*

*An integrated Masterplan has been prepared as part of this submission in response to the above request. Please refer to Darmody Architecture's drawing PA-002, which illustrates the potential future masterplan of the Citywest lands and indicates proposed & potential connections to the existing Saggart Luas stop, and the existing pedestrian connection to Saggart Village Centre. This drawing illustrates the proposed development within the subject site and the proposed links to adjoining sites and lands.*

## Appendix A - Response to ABP & SDCC Pre-Application Consultation Opinions

### An Bord Pleanála Pre-Application Consultation Opinion - Case Reference: ABP-308982-20

**4. Relevant drawings/reports that address the issue of residential amenity (both existing residents of nearby development and future occupants), specifically with regards to an amended daylight/sunlight/overshadowing analysis, overlooking, visual impact (Townscape and Visual Impact Assessment) and noise (including that from the surrounding road network). The application shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development. The daylight/sunlight/overshadowing analysis shall address the full extent of the requirements of 'Building Research Establishment (BRE) Report 209 "Site Layout Planning for Daylight and Sunlight – a guide to good practice, 2nd Edition, 2011' and BS8206 – Part 2: 2008 Code of Practice for Daylighting, where applicable.**

*Response:*

A detailed report titled, 'Sunlight, Daylight & Shadow Assessment (Impact Neighbours and Development Performance), has been prepared by Chris Shackleton Consulting and accompanies this application. Darmody Architecture has worked closely with Chris Shackleton Consulting in the redesign of the apartment units within Blocks A & B, to achieve a high level of compliance with the BRE Guidelines. The report concludes that, considering the scale and massing of the proposed development, its design has yielded excellent results in terms of sunlight and daylight.

*A Townscape & Visual Impact Assessment has been prepared by the Landscape Architects, Murrays and Associates, which illustrates the impact of the proposed development on the surrounding lands. Please refer to this document, which forms part of this submission.*

*Darmody Architecture have prepared full and complete drawings including levels and cross-sections showing the relationship between the proposed development and nearby residential development. Please refer to Existing and Proposed Site Sections, Darmody Architecture Drawing No.s, EX-200, EX-201, EX-202, EX-203 and PA-200, PA-201, PA-202, PA-203.*

*An Inward Noise Assessment report has been prepared by Acoustic Consultant, AWN, which outlines the impact of Noise on the proposed development from the surrounding road network. Please refer to this document, which forms part of this submission.*

**5. A Housing Quality Assessment (HQA) which provides the specific information regarding the proposed apartment/duplex units as required by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December, 2020). The assessment should also demonstrate how the proposed apartments/duplexes comply with the various requirements of those guidelines, including its specific planning policy requirements.**

*Response:*

*A comprehensive Housing Quality Assessment detailing all of the requirements set out above, has been prepared by Darmody Architecture and forms part of this submission.*

**6. A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of external finishes, the treatment of balconies and boundary treatments.**

*Response:*

*A comprehensive Materials and Finishes report detailing all of the requirements set out above, has been prepared by Darmody Architecture and forms part of this submission.*

**7. Landscaping Proposals, including a report that provides appropriate rationale and details, and addresses the comments contained within the Planning Authority's submission on this pre-application, and as contained within the report of Parks & Landscape Services (dated 1st February). Issues to be addressed, include, but are not limited to, the quality, quantity and location of the proposed open spaces; impacts on trees, replacement planting, and provision of play areas and details of integration of SuDS.**

*Response:*

*Please refer to the Landscape Architect's Report which has been prepared by Murrays and Associates, which outlines the requirements set out above. Additional information and details on SuDS is provided by CS Consulting Engineers. Please refer in particular to CS Consulting Report and Drawing No.s, MILL-CSC-ZZ-XX-DR-C-0010 & MILL-CSC-ZZ-XX-DR-C-0011, which forms part of this submission.*

**8. A report, that includes relevant surveys, that fully addresses potential impacts on ecology and biodiversity including, where appropriate, potential impacts on bats.**

*Response:*

*Please refer to the Ecologist Report which has been prepared by Altemar Environmental Engineers, which addresses the potential impacts on ecology and biodiversity.*

**9. A report that address potential impacts on Archaeology.**

*Response:*

*Please refer to an Archaeological Assessment Study prepared by Archaeological Consultancy Services Unit, which addresses South Dublin County Council's point raised on Archaeology, and forms part of this submission.*

## Appendix A - Response to ABP & SDCC Pre-Application Consultation Opinions

### An Bord Pleanála Pre-Application Consultation Opinion - Case Reference: ABP-308982-20

**10. Drainage details such as would address and respond to comments within the internal report from the Water Services of South Dublin County Council, and having regard to the submission from Irish Water (dated 18th January 2021).**

*Response:*  
Please refer to Drainage Details prepared by CS Consulting Engineers outlining all of the requirements set out above. In particular, refer to CS Consulting Report and Drawing No.s, MILL-CSC-ZZ-XX-DR-C-0005, MILL-CSC-ZZ-XX-DR-C-0006, MILL-CSC-ZZ-XX-DR-C-0007, which forms part of this submission.

**11. Additional CGIs/visualisations/3D modelling.**

*Response:*  
A number of CGIs/Visualisations have been prepared by Darmody Architecture and are included within the Appendix B section of the Architectural Design Statement.

A Townscape & Visual Impact Assessment has also been prepared by the Landscape Architects, Murrays and Associates, which illustrates the impact of the proposed development on the surrounding lands. Please refer to this document, which forms part of this submission.

**12. Existing and proposed surveys/ drawings/sections etc that clearly show the volume of land to be cut and filled/ that clearly indicate finished floor levels and ground levels. Finished floor levels should also be shown relative to existing residential units and relative to those permitted units (not yet constructed) to the south-east of this site.**

*Response:*  
Please refer to Proposed Cut & Fill drawing which has been prepared by CS Consulting. Please refer in particular to CS Consulting Drawing No. MILL-CSC-ZZ-XX-DR-C-0014, MILL-CSC-ZZ-XX-DR-C-0015 and T060-CSC-ZZ-XX-RP-C-0005\_Construction Management Plan Report, which forms part of this submission. An existing site survey is also included in Darmody Architecture Drawing No. EX-001.

Finished Floor Levels are indicated for all proposed residential units, and levels have been included relative to the permitted development south-east of the subject site. Please refer in particular to Darmody Architecture Proposed Site Plan, Drawing No. PA-001.

**13. Existing floor plans, elevations, sections detailing existing structures on site as well as demolition plans, where applicable. If applicable, the development description should refer to any demolitions proposed.**

*Response:*  
A detailed set of Existing floor plans, elevations, sections of the existing structures on the site to be demolished have been prepared by Darmody Architecture. Please refer in particular to Darmody Architecture Drawing No.s, EX-001, EX-100, EX-101, EX-102.

Further details of the demolition plans for the existing structure is included within CS Consulting Engineers Construction Management Plan, which forms part of this submission.

**14. All supporting technical/ environmental reports to be updated as required.**

*Response:*  
All relevant Technical and Environmental reports have been updated as part of this submission.

**15. A plan of the proposed open spaces within the site clearly delineating public, communal and private spaces.**

*Response:*  
All proposed open spaces, and communal open spaces are clearly identified on Darmody Architecture's Proposed Site Plan PA-001, and illustrated within Sections 8.1 & 10.1 of the Architectural Design Statement. The areas of proposed Public and Communal Open Spaces are also noted on Darmody Architecture's summary schedule of accommodation, which forms part of this submission. Please also refer to Murray & Associates Landscape design reports and drawings that illustrate the proposed detail.

**16. A report that addresses any aviation issues having regard to the location of the site relative to Casement/Baldonnell Aerodrome.**

*Response:*  
Please refer to Section 4.2.2 of a Statement of Consistency report, which has been prepared by the Planning Consultant, Manahan Planners which addresses the issues set out above.

**17. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.**

*Response:*  
A site layout plan indicating areas to be taken in charge has not been prepared as it is the Applicant's intention not to offer any areas of the proposed development to be taken in charge, and the site will be managed by a management company.

**18. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.**

*Response:*  
Please refer to Section 5.17 of the Statement of Consistency which has been prepared by the Planning Consultant, Manahan Planners. This section responds to the information set out in the relevant Article above described in the Regulations.

## Response to SDCC Issues raised in Pre-Application Process

### Zoning and Council Policy

The applicant is required to engage with the adjoining landowners and consider an Area Plan approach to provide an adequate basis to conclude that the proposed development is cognisant of its location within a wider RES-N zoned landbank and that the proposed street layout/ access from Mill Road and open space provides adequate connections and will not preclude the delivery of development on the remaining RES-N lands. The applicant should also explore the possibility of extending the site to provide frontage to Mill Road.

*Response:*  
The applicant has due consideration for the placement of the proposed development within the wider Mill Road area. A Masterplan drawing has been prepared by Darmody Architecture which illustrates the location of the subject site within a wider development approach to the local area. The proposed site layout also proposes potential vehicular connections to the north, and to the permitted residential development in the adjoining lands to the south. Please refer in particular to Darmody Architecture Drawing No.s PA-001 & PA-002. Due to the site constraints, it is considered not possible to extend the site, or provide direct frontage onto Mill Road for the application.

### Building Heights

The Planning Authority is not satisfied that this site justifies the proposed greater heights, having regard to its location from the centre of Saggart, the location to the closest Luas stop (approximately 1.6-1.8km from the site), the moderate bus services in the area and its current dependence on vehicular movement. The applicant is required to provide further justification (in addition to Section 5.2 of the Statement of Consistency submitted) to demonstrate appropriate sustainable links from the development to the public transport services.

The Planning Authority has concerns regarding the proposed heights. These concerns are related to the development and local context, planning policy, and relationship with the activities of the local aerodrome. The applicant is therefore encouraged to review the design approach and considerably lower the heights of the proposed buildings on the site and revisit the overall layout in the interests of:

1. Legibility
2. Sense of place
3. Gradual change in building heights with no marked increase in proximity to existing housing.
4. Operations of the local aerodrome.
5. Compliance with County Development Plan policy.

**Note:** the highest proposed structures on the site are located to the southern end of the site. This may have an impact on proposed dwellings and open space located directly to the north of these structures.

*Response:*  
The layout of the proposed development has carefully considered the location of the 2no. Apartment blocks within the subject site and in relation to the wider context. The design approach and height of these two apartment blocks strives to create a strong sense of place, add to the legibility of the layout and offers a gateway landmark to the lands to the east, for potential future development. The southern area of Block A is the tallest in height at 8no. storey height and stands as an urban marker in the wider Citywest lands to the east. Block A is located against the tall mature wooded eastern boundary, and it is approx. 57m from the permitted 3 storey duplex building in the adjacent site to the south with the mature wooded southern boundary separating the 2 distinct character areas. The design approach of gradual change and stepping down to 5 & 3 storey heights for the remainder of Block A, and Block B is in response to the 2/ 3 storey proposed adjacent housing and duplex units on the site, to ensure the blocks are not considered overbearing or overlooking. The configuration of the 2no. Apartment blocks has due regard to the site orientation to allow for a high level of daylight and sunlight into the communal courtyards, link spaces and to the individual apartment units. Please refer to the Architectural Design Statement and Planning Report prepared by the Planning Consultant, Manahan Planners.

To ensure improved connectivity to/from the site, the layout accommodates a pedestrian and cyclist link through the existing lands

of the Citywest campus with a new route proposed to provide a direct connection to the Saggart Luas stop. This route is identified in Darmody Architecture's Proposed Site Plan, PA-001, and is approximately 1km in length. Additional detail on this connection is outlined in NRB Consulting Engineers transportation report, and the Landscape Architects, Murrays and Associates, Landscape Masterplan.

Internally, the site layout accommodates a number of functional and high quality open amenity spaces. POS 01 is located centrally within the scheme to offer a generous and passively supervised green space for the residents and visitors. The legibility of this primary open space is extended throughout the site by POS 2, 3 & 5 which act as pocket parks for the adjacent streets and add to a variety of linked character amenity spaces.

### Density

Given the site location, public transport provision and existing connectivity, and the characteristics of the site adjacent to the N7, it is recommended that the applicant revise the proposals to provide a development of a lower density (c45-50ha per ha) in a new planning proposal. The site is zoned for residential and the Planning Authority is supportive of a residential scheme at an appropriate density.

*Response:*  
The Density of the proposed development is 59.36u/ha. The applicant is satisfied that the proposed density is sustainable for this largely greenfield site considering its location and proximity to quality residential amenities such as Saggart Village and to existing public transport modes such as the Luas and Dublin Bus.

The quantum of car and bicycle parking proposed with a direct pedestrian/ cycle link to the Luas Saggart stop through the adjacent Citywest Campus lands are design strategies that will support a higher residential density.

Please refer to a Statement of Consistency & Material Contravention report outlining the support for the density proposed, which has been prepared by the Planning Consultant, Manahan Planners, and forms part of this submission.

## Response to SDCC Issues raised in Pre-Application Process

### Unit Mix

The mix of the apartments is heavily weighted in favour of one and two bed apartment units. Section 11.3.1(i) of the CDP states that the mix of dwellings should contribute to the overall dwelling mix in the locality and that with the exception of student accommodation proposals that include a high proportion of one-bedroom dwellings (over 10%) shall be required to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. The applicant should demonstrate the mix of tenure in the immediate area of the site and further demonstrate how the proposed dwelling type is in balance with existing dwellings in the area. The applicant is encouraged to review whether any more three bedrooomed units (including apartments) could be incorporated into the proposal.

*Response:*  
Please refer to a Social Infrastructure Audit report outlining the support of the unit mix has been prepared by the Planning Consultant, Manahan Planners, and forms part of this submission.

### Tenure

The applicant has not stated within their submission whether the units would be for private sale or the rental market. This should be clarified by the applicant.

*Response:*  
The Applicant has confirmed that this is not a Build to Rent Scheme (BTR).  
Please refer to the Planning Report prepared by the Planning Consultant, Manahan Planners.

### Part V

The applicant engaged with SDCC at the pre application stage regarding social housing provision. The applicant now subsequently advises that 10% of the units will be submitted to the local authority. This conforms to Policy H1 Objective 2.

**A Part V area schedule was submitted with the application. This identifies 28 Part V units. This comprises 14 2-bedroom duplex units and 14 3-bedroom duplex units. Both of these blocks are located in the north of the site adjacent to the N7.**

*Response:*  
The number of units proposed for Part V is 28no. units, which is 10% of the total number proposed. These units are proposed within Apartment Block A, with provision for 10no. 1 Bedroom apartments, and 18no. 2 Bedroom apartments. Please refer in particular to Darmody Architecture Drawing No.s PA-A-100-V, PA-A-101-V, PA-A-102-V, PA-A-103-V, PA-A-104-V, and Darmody Architecture Part V Schedule.

## Response to SDCC Issues raised in Pre-Application Process

### Design, Layout and Visual Amenity

The Planning Authority has the following concerns regarding the overall design, including:

**1. It is not obvious from the proposed design layout how the proposed development will address and connect with the Village of Saggart, to which it will ultimately belong. The proposals appear to be designed in isolation from the overall Saggart area and relies heavily on its connection with the N7. The Planning Authority is concerned that it will become a ‘motorway-estate’, heavily dependent on vehicular movement (the Luas being located approximately 1.7km from the site)**

*Response:*  
An integrated Master plan prepared by Darmody Architecture illustrates the connectivity and permeability proposed. Please refer to Darmody Architecture’s drawing PA-002, which illustrates the potential future masterplan of the Citywest lands, and indicates connections to the existing Saggart Luas stop, and pedestrian connection to Saggart village centre. This drawing shows the proposed development within the subject site, and it’s connection to adjoining sites and lands.

Furthermore, to address the connectivity to/from the site, the layout proposes a pedestrian and cyclist link through the existing lands of Citywest Campus to the East to provide a direct connection to the Saggart Luas stop. This route is identified in Darmody Architecture’s Proposed Site Plan, PA-001, and is approximately 1km in length.

**2.The lack of demonstration how the proposed development will link with the housing development approved under SDA13/0221. This includes linking into the open space and pedestrian connectivity to this development. Planning permission SDA13/0221 will expire in 2023, notwithstanding, this permitted development / site must be considered within the overall design proposals for development on the subject site.**

*Response:*  
The permitted residential development to the south of the subject site has been considered in the overall design approach and is illustrated on the Proposed Masterplan and Site Plan. The layout addresses this point that South Dublin County Council has raised, and a proposed vehicular connection is proposed up to the southern boundary that can link with the permitted road layout. The location of POS 04 within the layout responds to the permitted open space in the adjoining lands, and planted green buffer to the east of the entrance road will be used to join the proposed and permitted developments. Please refer in particular to Darmody Architecture Drawing No. PA-001.

**3.How the proposed development addresses the undulating topography of the lands and how these changes in levels will impact on adjacent properties and how the development will be viewed from the N7. It is unclear how much cut and fill will be required. In this regard the Planning Authority recommend that a full site survey be carried out, to include existing contours. Proposed development drawings, including cross sections should clearly show the volume of land to be cut and filled and should clearly illustrate all finished floor levels and ground levels. A waste management plan should be submitted with the final application.**

*Response:* Please refer to Drawings and Reports prepared by CS Consulting Engineers outlining all of the requirements set out above. Please refer in particular to CS Consulting Drawing No. MILL-CSC-ZZ-XX-DR-C-0014, MILL-CSC-ZZ-XX-DR-C-0015 and T060-CSC-ZZ-XX-RP-C-0005\_Construction Management Plan Report, which forms part of this submission. An existing site survey is also included in Darmody Architecture Drawing No. EX-001.

**4.The proposed internal streets do not appear to incorporate DMURS requirements and the hierarchy of streets is unclear from the submitted drawings; all internal streets will be 6m wide, this is unacceptable.**

*Response:*  
The layout addresses this point that South Dublin County Council has raised and a hierarchy of the internal street network has been clearly identified by proposing a 5.5m and 6m wide street network and change in materials with raised tables. Please refer to compliance reports and Transportation Assessment Report prepared by NRB Consulting Engineers that forms part of this submission.

**5.The truncation of long streets should be addressed with the placement of highly designed structures or the incorporation of vistas towards the Dublin Mountains or other features in the immediate vicinity of the lands, i.e. church spires.**

*Response:*  
The layout addresses this point that South Dublin County Council has raised and allows for vistas to the south, west and east lands. The relocation of POS01, POS02, and POS05 provides distance between the residential units and the 2no. Apartment blocks, which affords visual connections to the immediate vicinity and towards the Dublin Mountains to the south.

**6.The exploration of opportunities for enhanced green energy technologies on site should be considered.**

*Response:*  
Please refer to a Sustainability Report prepared by Renaissance Engineering, Mechanical and Electrical Engineer, which forms part of this submission.

**7.The applicant should demonstrate that a single access will not cause a bottleneck or capacity issues on the road network.**

*Response:*  
Please refer to a Transportation Assessment Report in response to the above, prepared by NRB Consulting Engineers, and forms part of this submission.



## Response to SDCC Issues raised in Pre-Application Process

**8. The location of the apartment blocks to the south and east, in close proximity to existing 1-2 storey dwellings, is questionable. The relocation of these apartment blocks to the north and east should be considered. As per building heights section of this report (see above), lowering of the building heights should be encouraged to be in line with County Development Plan policy.**

*Response:*

*We are satisfied that the proposed location and height of the apartment blocks will create a strong sense of place and offer a landmark gateway to the Citywest Hotel & Conference Centre amenity lands to the east, for potential future development. The southern area of Block A is the tallest in height at 8no. storey height, and is an urban marker for the legibility of the proposed development and future development of the Citywest Campus. Block A is located against the tall mature wooded eastern boundary, and it is approx. 57m from the permitted 3 storey duplex building in the adjacent site to the south with the mature wooded southern boundary separating the 2 distinct character areas. The design approach of gradual change and stepping down to 5 & 3 storey heights for the remainder of Block A, and Block B is in response to the 2/3 storey proposed adjacent housing and duplex units on the site, to ensure the blocks are not considered overbearing or overlooking.*

*Please refer to a Material Contravention Statement which outlines the justification for the proposed heights, which has been prepared by the Planning Consultant, Manahan Planners*

**9. With regards to the layout of the public open space, it is questionable if the open spaces located to the south-east and western boundary of the site are functionable and of a significantly high quality. The applicant is encouraged to relocate these spaces into a central area of the development to ensure their usability, increase the passive surveillance and provide for a higher quality of space for the residents. It is not appropriate to suggest open space with a proposals to provide a future through-route through it (south east corner of site).**

*Response:*

*The layout has taken consideration of South Dublin County Council's point raised. The site layout has been designed to ensure the usability and quality of the proposed open spaces, and POS 01 has been relocated to the centre of the scheme to offer a generous, high quality, and passively supervised green space for future residents. The legibility of this primary open space is extended throughout the site by POS 2, 3 & 5 which act as pocket parks for the adjacent streets and add to a variety of linked character amenity spaces. With a proposed provision of approximately 19.4% public open space, this excludes areas of future through roads and service roads.*

*All proposed public open spaces are clearly identified on Darmody Architecture's Proposed Site Plan, and illustrated within Sections 6.0 & 8.0, 8.1 of the Architectural Design Statement.*

**10. The proposed removal of a number of trees and hedgerows proposed (as per the Arboricultural Impact Assessment and A Tree Impact Plan submitted). It is strongly recommended that hedgerows are retained within the development and that the removal of any trees is minimised. Significant mitigation measures should be provided where removal is proposed, in the interests of Climate Action and Adaptation and to help limit the surface water run-off from the site.**

*Response:*

*A number of existing trees and hedgerows are to be retained and incorporated into the public open spaces and buffer zones. Please refer to the Landscape Masterplan, Landscape Design Statement, & Arboriculture Impact Assessment prepared by the Landscape Architects, Murrays and Associates, and forms part of this submission.*

**11. Significant on-street car parking. There should be a mix of proposed parking on this site both in-curtilage and on-street. The applicant is also encouraged not to over provide on street parking so as to encourage the development of pedestrian friendly streets. This includes limiting parking in front of parks and utilising DMURS standards for internal road widths to reduce traffic speeds and promote pedestrian safety/comfort.**

*Response:*

*The car parking quantity and location, road hierarchy and layouts proposed, complies with DMURS and best practice. The layout has addressed South Dublin County Council's point raised, and car-parking has been removed from the perimeter of centrally located Public Open Spaces. A number of safe pedestrian crossing points are also proposed, which allow for safe permeability across and through the site.*

*Please refer to compliance reports and Transportation Assessment Report prepared by NRB Consulting Engineers, and forms part of this submission.*

## Response to SDCC Issues raised in Pre-Application Process

### Residential Amenity

**The future planning submission should include detailed information regarding the average daylight factor, and rooms should achieve above the minimum standards. It should also include shadow boundary blocks of the approved permission to the south (SDA13/0221) to clarify the permitted heights of these buildings, and this relationship to the 25 degree rule.**

**For further clarity separation distances of 22 metres are required between directly facing habitable room windows. This distance should be greater where greater building heights and extra floors are proposed. This should be marked out on the site layout plan to demonstrate compliance between the proposed and existing dwellings.**

*Response:*  
Please refer to a detailed report titled, 'Daylight ADF & Sunlight development Performance' prepared by Chris Shackleton Consulting that accompanies this application. Darmody Architecture has worked closely with Chris Shackleton Consulting in the design of the individual apartment units within Blocks A & B to achieve 99% compliance rate on ADF as defined by the BRE Guidelines.

Separation distances are maximised where possible between opposing habitable room windows. The separation distance from the higher Apartment Block A from its neighbouring Block, is more than 25.5m.

*Please refer in particular to Darmody Architecture drawings PA-001, PA-A-100, PA-A-101, PA-A-102, PA-A-103, PA-A-104.*

### Noise

**A noise assessment was submitted in support of the application which identifies the site as 'having a range of noise levels associated with a 'Low to Medium to High Risk' based on the proximity to the N7 road'. A full acoustic design statement will be submitted with the full application. This shall include appropriate mitigation measures such as boundary treatments and/or acoustic treatments to the proposed buildings. It is important that surveys are carried out at peak traffic times in the morning and evening to ascertain what the level of noise would be during these busier times.**

*Response:*  
An Inward Noise Assessment report has been prepared by Acoustic Consultant, AWN, which outlines the impact of Noise on the proposed development from the surrounding road network. Please refer to this document, which forms part of this submission.

### Standard of Accommodation and open space

*Response:*  
A comprehensive Housing Quality Assessment report detailing compliance with residential standards has been prepared by Darmody Architecture and forms part of this submission. This includes detailed schedules of the proposed quantum of dual aspect units which is more than 50%, and the areas provided for communal and private amenity space. Details of this is illustrated within Sections 10.1 & 10.2 of the Architectural Design Statement.

*All proposed public open spaces are clearly identified on Darmody Architecture's Proposed Site Plan, and illustrated within Sections 6.0 & 8.0, 8.1 of the Architectural Design Statement.*

### Parking and Access

*Response:*  
Please refer to compliance reports and Transportation Assessment Report prepared by NRB Consulting Engineers, which gives addresses South Dublin County Council's point raised for parking and access, and forms part of this submission.

### Landscaping

*Response:*  
Please refer to compliance reports and drawings prepared by the Landscape Architects, Murrays and Associates, which addresses South Dublin County Council's point raised on Landscaping issues, and forms part of this submission.

### Drainage and Water Supply

*Response:*  
Please refer to compliance reports and drawings prepared CS Consulting Engineers, which addresses South Dublin County Council's point raised on Drainage and Water Supply issues, and forms part of this submission

### Archaeology

*Response:*  
Please refer to an Archaeological Assessment Study prepared by Archaeological Consultancy Services Unit, which addresses South Dublin County Council's point raised on Archaeology, and forms part of this submission.

### Screening for Appropriate Assessment

*Response:*  
Please refer to reports and drawings prepared by Altamar Environmental Engineers, which addresses South Dublin County Council's point raised on Appropriate Assessment issues, and forms part of this submission.

### Screening for Environmental Impact Assessment

*Response:*  
Please refer to reports and drawings prepared by Altamar Environmental Engineers, which addresses South Dublin County Council's point raised on Environmental Impact Assessment issues, and forms part of this submission.

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**Other specialised services include**

- BER Assessments** (commercial and domestic)
- Conservation Consultancy**
- Project Management**
- Health & Safety** (Project Supervisor Design Process PSDP)
- Fire Certificate Applications**
- Project Appraisal**
- Sustainability**
- Expert Witness**

Darmody Architecture is a member of the Royal Institute of the Architects of Ireland, the Royal Institute of British Architects and the Docklands Business Forum.

