

Planning Department
Dublin City Council
Civic Offices
Wood Quay
Dublin 8
D08 RF3F

15 August 2024

Re: Large Scale Residential Development – Stage 2 LRD Meeting Request for a Development of 408 no. Residential Units at Clongriffin, Dublin 13
Response to DCC Opinion – DCC Ref. LRD6064/24-S2

Dear Sir/Madam

This letter accompanies an LRD application submitted on behalf of the Land Development Agency (LDA) (the applicant). This letter constitutes the Statement of Response to the specific information requested by Dublin City Council ('DCC') as set out in its Notice of LRD Opinion ('the LRD Opinion') (DCC Ref. LRD6064/24-S2) issued on 5 July 2024, following an LRD Meeting that took place on 11 June 2024.

The LRD Opinion states that following consideration of the issues raised during the LRD Meeting the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Planning and Development Act, 2000, as amended, requires further consideration and amendment to constitute a reasonable basis for an application for Large-Scale Residential Development. The Notice advises that the application should be accompanied by:

- (a) A Statement of Response to the issues set out in the LRD Opinion. This letter constitutes the Statement of Response.
- (b) A Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. In this regard, a Planning Report and Statement of Consistency accompanies the planning application. The submitted Report cross references drawings and documents submitted with the application, as appropriate.

Table 1 summarises the issues raised in the LRD Opinion under the headings used in the LRD Opinion in the left column, and a response in the corresponding right column. Where a direct response to the issue is not provided the table referencing the relevant submitted document and/or drawings that addresses the specific issue.

Table 1: Statement of Response to the Issues set out in the LRD Opinion and Specific Information requested by DCC

Item to be Addressed	Statement of Response
1. Planning and Design	
1.1 Vents and Structures in the Communal Open Space	
<p><i>From the documentation submitted as part of the Stage 2 LRD Opinion submission received 21st May 2024, the usability of the proposed courtyard spaces is unclear due to the location of vents and a centralised energy system. This is particularly the case at Block 6 where the proposed first floor plans show 2 no. large centrally placed energy systems. These 2 no. large centrally placed energy systems were not identified on the Section CC drawing submitted. Due to the extensive nature of the vents and energy system, the overall usability of the courtyard as an amenity space is questionable; particularly in relation to the location of children's play areas within the courtyards. It is noted that during the opinion meeting additional information was presented in relation to the finishes/treatments of the energy systems. Additionally, a re-orientation of the vents had also been presented, which were both welcomed, however, this opinion report is formed on the information submitted to the Planning Authority as part of the Stage 2 LRD Opinion submission received 21st May 2024.</i></p>	<p>The design and layout of the proposed development has been amended to remove both of the previously proposed energy plant elements within the central courtyard of Block 6.</p> <p>The design and siting of the proposed vents have been reconfigured and relocated closer to the inside facades of the buildings framing the courtyards. This revised design optimises the layout and design of the courtyard spaces by opening up the spaces and thereby enhancing their functionality and attractiveness.</p>
1.2 Internal Residential Amenity – Daylight / Sunlight Impact Assessment	
<p><i>More clarity is needed on which units are not meeting the required standards. Clear identification of adversely affected properties in the surrounding area is required. The number of properties affected and their locations will need to be identified.</i></p>	<p>The submitted Daylight and Sunlight Assessment has been reviewed, restructured and is presented in two separate reports, as follows:</p> <ul style="list-style-type: none"> • Report 1 of 2 (Daylight and Sunlight Performance Assessment) - This report focusses on the daylight / sunlight performance of the proposed development and its associated amenity and public open spaces within the redline application boundary. • Report 2 of 2 (Daylight & Sunlight Impact

Item to be Addressed	Statement of Response
	<p>Assessment) - This report focusses on the assessment of impacts arising from the development on existing neighbouring / surrounding properties located outside the redline application boundary.</p> <p>Section 5 of the submitted Daylight & Sunlight Impact Assessment (report 2 of 2) clearly identifies properties along Belltree Avenue to the north and Park Street to the west that are affected by the proposed. In addition, a summary is also provided in Section 12 (pg. 69) of the submitted Architectural Design Statement.</p> <p>The submitted Report 1 of 2 also includes high resolution floor plans which illustrate on a floor-by-floor basis which units fall below the BRE standard and to what extent. It also outlines compensatory measures that have been provided for each of the affected units.</p> <p>Similarly, for the existing dwellings to the north and west of the site, composite elevations for each of the existing properties are now included in the main body of Report 2 of 2.</p> <p>Each individual property has been assessed and reported to clearly detail how each individual property is performing and which windows are affected.</p>
<p><i>The report language needs to be consistent with the Development plan - Section 5.3 of Appendix 16 of the Dublin City Development Plan 2022 – 2028 refers. The language used for impact classification should reflect guidelines set out in the BRE guide (BR 209) "Site Layout for Daylight and Sunlight, A Guide to Good Practice" 2022 3rd Edition. The guidelines in the documents are intended to be used in conjunction with recommendation in BS EN17037, and CIBSE Lighting Guide (LG10): daylighting and window design.</i></p>	<p>This has been applied and the language and classifications used with regard to daylight impact are consistent with BRE Guide 209, specifically Appendix H.</p>
<p><i>The Planning Authority would rather see those units that "majorly fail" highlighted by the metrics as opposed to those the slightly fail.</i></p>	<p>The Spatial Daylight Autonomy (sDA) results for all units within the scheme are provided in Appendix B of Report 1 of 2 (Daylight and Sunlight Performance</p>

Item to be Addressed	Statement of Response
	<p>Assessment). These results are summarised in section 5.1 of the body of the report. The results are also accompanied with notes of the author's professional opinion, which provide additional context to the daylighting results. The classification of results in the submitted report clearly identify those units which are failing along with their respective compensatory measures.</p>
<p><i>Concerns regarding impact on Sunlight to Private Garden Spaces. Page 32 of the Daylight/Sunlight Assessment identifies the impact of the development on Park Terrace North and Lake Street as being substantial. No justification or compensatory measures are detailed and are required.</i></p>	<p>Sub-section 5.3 of the submitted Report 2 of 2 (Daylight & Sunlight Impact Assessment) provides a detailed assessment of sunlight impacts on nearby properties.</p> <p>Further assessment of the two affected properties (identified as 29 and 43 Belltree Avenue on pg. 72 of the report) is provided by having regard to more detailed shadow casting diagrams for the garden spaces of these properties (on pg. 73-78 of the report) to demonstrate that the private gardens of these properties would still benefit from good sunlight penetration during the warmer months of the year (from mid-April to the end of August) when gardens are typically more intensely used by residents.</p>
<p><i>Further elaboration needed on the compensatory measures proposed for units failing daylight/sunlight. The Planning Authority request that genuine and robust compensatory measures be highlighted and listed.</i></p>	<p>The submitted Report 1 of 2 (Daylight and Sunlight Performance Assessment) has been reviewed and amended since the DCC Stage 2 Opinion was issued to clearly identify units which fall below the recommended standards. These results are summarised in section 5.1 of the body of the report and are accompanied with notes of the author's professional opinion, which provide additional context to the daylighting results. The classification of results in the submitted report clearly identify those units which are failing along with their respective compensatory measures. Full details of the compensatory measures are set out in Appendix C of Report 1 of 2 (Daylight and Sunlight Performance Assessment).</p>
<p><i>The figures and diagrams included in the documents that were submitted were illegible.</i></p>	<p>The submitted reports have been reformatted. Figures have been enlarged and presented in higher</p>

Item to be Addressed	Statement of Response
<p><i>Larger maps, easier to blow up, include north point for ease of viewing.</i></p>	<p>resolution to provide greater clarity. Similarly, drawings for adjacent existing dwellings have been enlarged so each property and the impacted windows are clearly identified.</p> <p>Larger scaled drawings have been included in the appendices of Report 1 of 2 (Daylight and Sunlight Performance Assessment) to provide greater clarity in this regard.</p>
<p><i>The percentage of amenity space receiving 2 hours of sunlight on 21st March just meets the standards at 51.5%. Preference would be for this to be increased if possible.</i></p>	<p>The omission of the previously proposed plant structures at the podium level courtyard within Block 6 has resulted in an increase in useable community open space and an improvement on the overall percentage of amenity space which receives ≥ 2.00 hours of sunlight on 21 March from a previously recorded 51.5% to 64.9%.</p>
<p>Single aspect north facing units i.e. within 45 degree angle of due north</p>	
<p><i>It is noted that the orientation (i.e. south, north facing etc.) and aspect (single, dual etc.) were not included as part of the Housing Quality Assessment (HQA). Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.</i></p>	<p>The submitted Housing Quality Assessment for each block includes aspect and orientation for all units. Further detail on aspect ratios can be found in Section 9 (pg. 44-45) of the submitted Architectural Design Statement.</p> <p>The compensatory measures associated with the aspect of the identified units are discussed in detail in Appendix A of the submitted Architectural Design Statement. Compensatory aspects in relation to the Daylight/Sunlight Impact Assessment of these units are listed in Appendix C of the submitted Report 1 of 2 (Daylight and Sunlight Performance Assessment).</p>
<p><i>As stated within the Architectural Design Statement; Over 60% of the apartments are dual aspect and there are no single aspect north-facing apartments. However, it is noted that details on the aspect and orientation were not included as part of the HQA and it is considered that the proposal appears to include a number of single aspect north-east and north-west facing units which were not addressed within the Stage 2 LRD Opinion submission received 21st May 2024. For example, at Block 5 Units 05-01-24, 05-01-25, and 05-01-26 are single aspect north-west facing units (repeated to upper floors). Additionally, it is considered that the KLD window of 1-bed unit 05-01-26 (unit repeated to upper floors) is within a 45 degree angle of due north. These units overlook</i></p>	

Item to be Addressed	Statement of Response
<p><i>the internal courtyard and, as shown within the Daylight/Sunlight Impact Assessment, the KLD's appear to fail to meet the BRE 209 Guidance. Orientation and aspect should be stated within the HQA and the compensatory measures for any units failing the Daylight/Sunlight Impact Assessment shall be listed or preferably addressed by a redesign.</i></p>	
<p>Screening</p>	
<p><i>1.8m high screens shall be placed between adjoining balconies and patios.</i></p>	<p>The design of the scheme has been amended to incorporate 1.8 m high screens, as shown on the submitted floor plans and elevations of each block.</p> <p>The submitted Architectural Design Statement address this matter in Chapter 12 where full details of the proposed privacy screening are provided.</p>
<p><i>Obscure Windows to the K/L/D of ground floor unit 2A 00-11 in Block 6 which directly adjoins the outdoor area of the crèche should be omitted. Privacy measures for this terrace should be detailed having regard to its location adjacent to the outdoor area.</i></p>	<p>The submitted Architectural Design Statement outlines on pg. 66 privacy measures for the unit adjoining the creche play area. It is noted that the enclosure of the play areas has been reconfigured to maximise privacy to the adjacent ground floor unit 6-00-11 and its terrace to the east. Straight bar metal fencing in a curved arrangement will ensure the play area does not directly adjoin the residential terrace and allow views out while blocking oblique views in from passers-by.</p> <p>Windows to the flank of unit 6-00-11 facing the play area will be high level windows raised substantially to minimise any potential impacts and screening is provided to the west facing cheek of the terraced area.</p>
<p>1.3. Cultural and Community Uses – CUO25</p>	
<p><i>A Social and Community Infrastructure Audit was not included as part of the Stage 2 LRD meeting request pack received 21st May 2024, however, a Social and Community Infrastructure Audit is required as part of the Stage 3 application.</i></p>	<p>A Social and Community Infrastructure Audit (SCIA) is submitted with the application.</p>

Item to be Addressed	Statement of Response
<p><i>As noted during the Opinion meeting crèche/childcare provision will be determined by the results of the Childcare Demand Assessment. A full Childcare Demand Assessment including an audit of existing facilities within the locality and demographic analysis of the locality is required.</i></p>	<p>Sub-sections 5.2.2 and 5.2.5 of the SCIA provides an audit of existing childcare facilities and parks / play facilities in the area.</p> <p>Sub-section 6.1.2 provides a Childcare Demand Assessment.</p> <p>A demographic analysis of the area is provided in Section 3 of the submitted SCIA.</p>
<p><i>In line with the Dublin City Development Plan 2022-2028, the optimum provision would be 5% Community and Arts/Cultural space (i.e., 1,437 sqm) and a crèche. The Social and Community Infrastructure Audit of the surrounding area is vital for determining the quantum of existing amenities and demand for new community/cultural facilities in the locality. The applicant is urged to engage with existing local community groups and Dublin City Council's Arts Office as part of the Audit. Additionally, the Childcare Demand Assessment will determine the quantum of childcare spaces required, as well as the childcare demand arising from the existing population.</i></p>	<p>Section 6.5.4 of the submitted Planning Report and Statement of Consistency sets out the detailed response to this issue. In addition, the submitted SCIA provides an audit of existing community, arts and cultural facilities in the area, including a childcare demand assessment at section 6.1.2 that identifies the demand for additional childcare provision and a lack of capacity in the area.</p> <p>Sub-section 6.3.2 of the submitted SCIA details an appropriate delivery mechanism in the form of an appropriate planning condition to facilitate engagement with local community groups and the Dublin City Council's Arts Office.</p>
<p><i>Consideration should be given to the ground floor community/arts/cultural spaces and commercial uses in terms of opening hours, i.e. a selection of different times of closing/uses so that the street is not empty after 5pm. The Planning Authority asks the applicant to be cognisant of the uses of the units on ground floor i.e. sale and lease of the units. Additionally, the applicant is requested to consider quality privacy measures and frontage design at ground floor level. Measures such as window coverage glazing/stickers can negatively impact vitality of frontage. In this instance oblique glazing would be a positive design response, the Planning Authority will actively promote the principles of good frontage design.</i></p>	<p>Section 6.3.2 of the submitted Community and Social Infrastructure Assessment suggests appropriate wording for a planning condition to be attached to a grant of permission that will serve as an appropriate delivery mechanism for the proposed community, arts and cultural uses.</p>
<p>1.4 Public Open Space</p>	
<p>The DCC Opinion quotes from the submitted Planning Statement in respect of public open</p>	<p>This matter is addressed in detail in section 6.5.6 of the submitted Planning Report and Statement of</p>

Item to be Addressed	Statement of Response
<p>space provision and children’s play facilities and then goes on to state that:</p> <p><i>‘It is noted that the open space strategy is reliant on the proximity to Fr Collins Park, The previous permission on site had a large BTR element with a relaxation of minimum open space standards. The submitted Design Report notes in terms of tenure that 90% of the proposed units will be cost-rental and 10% will be Part V social housing. Thus it is submitted that a landscape masterplan detailing phasing and open-space provision for the wider lands within the control of the LDA should be submitted as part of the Stage 3 submission.’</i></p>	<p>Consistency.</p>
<p>2. Appropriate Assessment - The following comments relate to the AA Screening Report submitted as part of the Stage 2 LRD Opinion submission received 21st May 2024:</p>	
<ul style="list-style-type: none"> • <i>Source – Receptor – Pathway model to be used (rather than 15km radius); all sites within a 15km do not have to be included (if applicant wishes to include them put them into an Appendix);</i> • <i>Focus on the potential of the development to have an impact on what sites and what are those two or three sites and put them to the front of the report.</i> • <i>Findings of AA Screening– wording should use the exact wording of the Directive itself and reflect the requirements of the Directive.</i> 	<p>The submitted Screening Report for Appropriate Assessment was reviewed and updated by OPENFIELD Ecological Services following the issue of the LRD Opinion to address the matters raised.</p> <p>The submitted AA Screening Report states that the methodology employed in the preparation of same is consistent with the guidance ‘document prepared for the Environment DG of the European Commission entitled ‘Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC’ (EC, 2021).’</p> <p>The submitted AA Screening Report presents a Stage 1 Appropriate Assessment Screening for the proposed development and provides the necessary information that is required for the competent authority (DCC) to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European site.</p>
<p>3. Drainage (Surface water management and flood risk) - The Drainage Planning, Policy and Development Control (DPPDC) section has no objection to a Stage 3 planning application being</p>	

Item to be Addressed	Statement of Response
submitted for this LRD scheme, subject to the following items being addressed:	
<p><i>Clarification is required on the storage volumes provided in the existing attenuation pond. This pond appears to have been designed to store the 30 year rainfall event. However, current policy requires the 100 yr rainfall event (+20% climate change) to be catered for. In the absence of evidence to demonstrate that the existing pond can cater for this event, the applicant shall attenuate flows on site to 2l/s. The applicant is advised to consult with the Drainage Planning, Policy and Development Control (DPPDC) section prior to submission of a Stage 3 planning application.</i></p>	<p>A response is provided under sub-section 6.1.2 of the submitted Engineering Services Report, prepared by CS Consulting Group.</p>
<p><i>The details of the SuDS devices proposed for public areas shall be agreed with the Drainage Planning, Policy and Development Control (DPPDC) section. In particular, the road gully and permeable paving arrangement needs to be revised. The inspection chambers shall be in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0.</i></p>	<p>A response is provided under sub-section 6.2.2 of the submitted Engineering Services Report, prepared by CS Consulting Group.</p>
<p><i>The proposed tree pits shall be designed by a landscape architect, and agreed with both DCC Parks and the Drainage Planning, Policy and Development Control (DPPDC) section.</i></p>	<p>A response is provided under sub-section 6.3.2 of the submitted Engineering Services Report, prepared by CS Consulting Group. The submitted landscaping details provide full details of the proposed tree pits, including appropriate growing medium, root barrier, size and plants. The trees shall be as per Dublin City Council requirements. The tree pit details are shown on RMDA Drawing No. 08 (Tree Pit Details) and are discussed in the accompanying Landscape Rationale statement.</p>
<p><i>The full extent of areas and infrastructure to be taken in charge by Dublin City Council shall be clarified. Surface water drainage infrastructure, including SuDS devices within these areas must be in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0, and the requirements of the DPPDC section. Private drainage infrastructure is not permitted in</i></p>	<p>The applicant confirms that the road/street network and associated infrastructure is proposed to be Taken in Charge by Dublin City Council as set out and indicated on the submitted Taking in Charge Plan Drawing No. CLN-CCK-LRD-SI-00-DR-A-000010. The internal communal open space areas are to be maintained by a private management company.</p> <p>Refer also to sub-section 6.4.2 of the submitted</p>

Item to be Addressed	Statement of Response
<i>public areas, or areas intended to be taken in charge.</i>	Engineering Services Report, prepared by CS Consulting Group.
4. Transportation - The applicant is advised that the following points are to be addressed within the final LRD application documentation:	
<p><u>Bus Connects Proposed D3 Route:</u></p> <ul style="list-style-type: none"> <i>The applicant is requested to provide revised plans and detailed information that ensures compliance with the requirement of the NTA Bus Connects D3 Bus Route on the adjoining road network from Marrsfield Avenue to Lake Street and Clongriffin Road. It is a requirement that this route be protected and the realignment of the road shall be identified within the planning application.</i> <i>Further dialogue and consultation with the Transportation Planning Division to ensure compliance with the requirements of the NTA is required on this matter.</i> 	A response is provided under sub-section 9.1.2 of the submitted Traffic and Transport Assessment, prepared by CS Consulting Group.
<p><u>Taken in Charge:</u></p> <ul style="list-style-type: none"> <i>A Taking in Charge drawing should be submitted outlining proposed areas to be taken in charge. This plan should outline the public and private areas demarcated and provide footpath widths at 5m intervals on proposed footpath areas to be taken in charge in this regard. It is a requirement that the roads taking in charge proposal extends from back of footpath to back of footpath. Piecemeal taking in charge is not support by the Roads Authority.</i> <i>The applicant shall be aware that all on-street parking spaces identified on the proposed layout will be taken into charge. On-street car parking spaces cannot be assigned to the development and will be for general public use.</i> 	<p>The submitted Taking in Charge Plan Drawing No. CLN-CCK-LRD-SI-00-DR-A-000010 clearly shows the extent of areas to be taken in charge is submitted with the application.</p> <p>A response is provided under sub-section 9.2.2 of the submitted Traffic and Transport Assessment, prepared by CS Consulting Group.</p>
<p><u>Internal Access and works on roadway requires review:</u></p> <ul style="list-style-type: none"> <i>A Stage 1 Road Safety Audit should be</i> 	A response is provided under sub-section 9.3.2 of the submitted Traffic and Transport Assessment,

Item to be Addressed	Statement of Response
<p><i>provided which examines the proposed access roads within the development, and any impact with the existing road network.</i></p> <ul style="list-style-type: none"> • <i>All internal road proposals should demonstrate compliance with DMURS.</i> • <i>All access proposals require to be fully auto tracked. Auto tracking of access proposals e.g. cars, refuse, emergency, substation, deliveries etc. is required including junctions, turning areas, parking spaces and laybys and turning circles proposed. Swept path analysis should ensure that there is no overhanging onto footpath areas to ensure no impediment to pedestrians.</i> • <i>Pedestrian priority should be provided across the site. Measures including contrasting materials, signing, and road marking, etc. should be incorporated to ensure that vehicles entering/leaving the development are aware that pedestrians/cyclists have priority across the site and that vehicles must yield right-of-way.</i> 	<p>prepared by CS Consulting Group.</p>
<p><u>Car parking:</u></p> <ul style="list-style-type: none"> • <i>Submit a Car Parking Management Plan, in particular with details on how car parking will be managed on the site and how the set down/drop off areas and time constraints will be managed.</i> • <i>Details on the potential for car share spaces such as Go Car or similar should be examined. These shall be located on-street.</i> • <i>All car parking spaces should be provided on a site layout plan where the various uses are colour coded/numbered to differentiate between the areas for drop off/set down, uses as well as the accessible parking and EV parking spaces. All on-street spaces to be taken in charge shall be identified in line with the Taking in Charge drawing.</i> 	<p>A Proposed Parking Allocation Plan (no. CLN-CCK-LRD-SI-00-DR-A-000011) has been prepared by CCK Architects and is submitted as part of the planning application documentation.</p> <p>A response is provided under sub-section 9.4.2 of the submitted Traffic and Transport Assessment, prepared by CS Consulting Group.</p>

Item to be Addressed	Statement of Response
<p><u>Cycle parking:</u></p> <ul style="list-style-type: none"> • Detailed drawings of the bicycle stores to be provided outlining type and quantum per store/area, ensuring functionality and ease of access, including the type of bicycle stands proposed and distance between each stand. Ensure bicycle stores are located at the most convenient areas close to stairs/lifts in the undercroft area. Ensure the access doors to these stores are appropriately located. • Revised site layout clearly delineating the location of all visitor bicycle parking, distances between each stand and shelter for bicycle parking. • Areas for Cargo bikes, and electric bicycle charging stations and quantum of spaces per area should be outlined in submitted drawings. • Details on how bicycle stores are to be managed should be provided i.e. with access to certain areas for residents. 	<p>Full details for all bicycle parking arrangements within the scheme are shown on submitted Drawing Nos. CLN-CCK-LRD-B5-ZZ-DR-A-000400 and CLN-CCK-LRD-B6-ZZ-DR-A-000400, for Blocks 5 and 6 respectively. The number of regular cycle spaces and cargo bike spaces are clearly annotated and shown for each bicycle store.</p> <p>Section 5.3 of the submitted Servicing, Operations & Car Parking Management Plan sets out the management regime for the proposed bicycle parking provision.</p>
<p><u>Servicing and Operations:</u></p> <ul style="list-style-type: none"> • Demarcated loading and servicing areas should be provided. This is to ensure that servicing can be carried out without impact on other road users. • Details on how waste will be transferred from storage areas to collection areas to be outlined. • A Servicing and Operations management plan should be submitted with any forthcoming LRD application and should include details of all anticipated servicing and operational requirements e.g. times for deliveries (weekly/daily or similar) for the residential components of the development, including set down location for servicing and delivery vehicles. • Swept path analysis should be examined to ensure that servicing vehicles do not overhang the footpath/pedestrian areas in their 	<p>A Servicing, Operations & Car Parking Management Plan is submitted with the application. Section 4 address servicing and operational management of the scheme and Section 5 addresses parking management for cars, bicycles and motorcycles. This document is read in conjunction with the submitted Operational Waste Management Plan (OWMP) that provides additional detail on the proposed operational waste management procedures.</p> <p>The submitted swept path analyses demonstrate that servicing vehicles (including refuse collection vehicles) would not interfere with, or overhang dedicated pedestrian routes in carrying out their manoeuvres.</p>

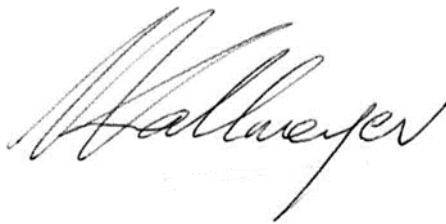
Item to be Addressed	Statement of Response
<i>manoeuvres."</i>	
<p>5. Parks, Biodiversity and Landscape Services - The following recommendations of the Parks, Biodiversity and Landscaping Services should be addressed within the final application documentation:</p>	
<p><i>Grant Park – concern on the overall ground/soil conditions of the site, which should be addressed in a landscape report. Complete replacement of the existing ground/soil may be required. Around the park no ad hoc parking to be allowed, with double yellow lines required around all perimeter roads boundary around the park. The park is intended to be taken in charge, subject to Park Services agreement and all the construction level details will be required to be submitted as a condition with any planning approval.</i></p>	<p>The submitted Landscape Design Rationale report states that replacement topsoil is required in order to ensure a healthy substrate for the parkland. It is proposed to replace the top 600mm soil with new imported high-quality topsoil, which will ensure good growth for new planting.</p> <p>The submitted Landscape Masterplan (Drawing No. 01) shows no on-street car parking is proposed on the roads surrounding the proposed pocket park.</p> <p>The submitted Taking in Charge Plan (Drawing No. CLN-CCK-LRD-SI-00-DR-A-000010) shows the extent of areas to be taken in charge which includes the totality of the proposed pocket park (and its surrounding roads).</p>
<p><i>Regarding streetscape, tree planting species proposed are unsuitable for SUDS. New guidelines being issued by Dublin City Council and we will issue draft list of species onto landscape architect.</i></p>	<p>The submitted Landscape Masterplan (Drawing No. 01) specifies tree planting species in accordance with the new guidelines for tree types in the proposed SUDS tree pits. The submitted Schedule of Planting specifies species, variety and girth of trees.</p>
<p><i>Concerns raised regarding sunlight/ daylight assessment, Block 6 communal open space is just at 51.5% which is marginal in terms of sunlight. Measures required to address.</i></p>	<p>The revised design for the podium level courtyard in Block 6 has resulted in an increase in the proportion of area benefiting from sunlight penetration. In this regard, 64.86% of the useable podium amenity area receives 2 hours of sunlight on 21 March. This equates to an area of 1,693 sqm. Given that the required quantum of communal open space for Block 6 at 1,646 sqm, 100% of the required area of communal amenity space receives 2 hours of continuous sunlight penetration on the 21 March.</p>
<p><i>Biodiversity: Ecological impact assessment report to look at invasive species to survey the sites that were left vacant for a long time.</i></p>	<p>Enclosed with the application is a Desktop Ecology Study that was prepared by ALTEMAR. It confirms that the National Biodiversity Data Centre's online viewer was consulted in order to determine whether there have been recorded sightings of invasive</p>

Item to be Addressed	Statement of Response
	<p>species in the wider area. The Report states:</p> <p><i>'The proposed development site is not located within a designated site under the NATURA 2000 network. There are no specific records of protected flora and fauna within the site boundaries. No protected species or invasive species were noted on site.'</i> [Emphasis added in bold]</p> <p>A visual inspection of the site by Ronan Mac Diarmada & Associates has confirmed same – refer to the submitted Landscape Design Rationale Report.</p>
<p><i>Draft taking in charge plan should be included with the application.</i></p>	<p>As noted earlier, a Taking in Charge Plan - Drawing No.CLN-CCK-LRD-SI-00-DR-A-000010 is submitted with the application.</p>
<p>6. Archaeology - The following recommendations of the Archaeology Section should be addressed within the final application documentation:</p>	
<p><i>An updated desktop Archaeological Impact Assessment (AIA) was included with the submitted S2 documents, as requested by this office at the S247 meeting. This report has been reviewed by this office, and it is noted that the site has been fully archaeologically resolved by way of excavation carried out in the past. The surrounding landscape has been shown to be of a highly significant archaeological nature, including an early medieval ringfort located directly to the east, previously excavated and fully recorded. A number of pits were also previously excavated within the red line boundary of the site. These excavations highlight the past nature of the landscape, which was not only domestic but potentially ritual, in nature. The character of the landscape has changed dramatically in the recent past, from rural to high density modern developments. There is almost no indication of the archaeological significance of the area left in the modern landscape.</i></p>	<p>Section 4 of the submitted Archaeological Impact Assessment (AIA) confirms DCC's observations, and has been updated to include section 4.3, as discussed below.</p>
<p><i>This office would therefore recommend that an interpretation strategy highlighting the archaeological and historical significance of the</i></p>	<p>Section 4.3 of the submitted AIA recommends that heritage signage be provided to highlight the significant archaeological heritage of the landscape.</p>

Item to be Addressed	Statement of Response
<p><i>landscape be included in any proposed mitigation for the site, for example, using signage and place-making.</i></p>	<p>It is recommended that the provision of Information Panels that reflect this rich archaeological heritage would assist in providing a sense of place to the new residents. Such panels would include illustrations and text designed to be informative and readily accessible to the general public, fostering an interest and pride in the heritage of the area.</p> <p>It is submitted that this matter could be appropriately dealt with at compliance stage and that such details could be conditioned for the agreement with the Planning Authority and in consultation with the City Archaeologist. It is submitted that an appropriate trigger for the provision of the panels would be post-completion of the development but prior to the occupation of the first residential unit.</p> <p>Figure 3.3 of the submitted Landscape Design Rationale report shows indicatively the potential location for such an information panel at the entrance to the proposed pocket park off Lake Street.</p>

I trust that the submitted documents have comprehensively addressed all of the matters raised by the Planning Authority and I look forward to an early and favourable decision.

Yours faithfully,



Hennie Kallmeyer
Declan Brassil & Co.