



## **Response to Fingal County Council LRD Opinion Report**

Proposed Large-scale Residential Development (LRD) in  
St. Mochta's Lands, Kellystown LAP, Clonsilla, Co. Dublin

June 2025

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**Client Name:** Castlethorn Developments Luttrellstown Unlimited  
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## Quality Assurance – Approval Status

This document has been prepared and checked in accordance with  
Waterman Group's IMS (BS EN ISO 9001: 2015 and BS EN ISO 14001: 2015)

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## Comments

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## **1. Introduction**

### **1.1 Context**

This report forms part of a submission to Fingal County Council (FCC), in response to engineering items raised in the LRD Stage 2 Opinion report for the proposed residential development on lands at Kellystown, Clonsilla, Co. Dublin.

### **1.2 Planning Application Details**

Local Authority: Fingal County Council  
Planning Reference: LRD0052/S2  
Applicant: Castlethorn Developments Luttrellstown Limited  
Location: Kellystown, Clonsilla, Co. Dublin

### **1.3 Summary of Report**

Sections 2 and 3 of this report address the engineering items included in Fingal County Council's LRD Opinion report. Section 2 addresses Transportation items, while Section 3 addresses Water Services items. For clarity, the items from Fingal County Council's Opinion report are set out in bold italics, with the Applicant's response provided below each item.

## 2. Response to Transportation Items

### 2.1 Item No. I

***Address the Transport objectives of the LAP in the submission.***

**Response:**

The proposed road layout, pedestrian and cycle facilities have been developed in accordance with the Transport Objectives of the Local Area Plan. Please refer to Section 4.4 and 4.5 of the Traffic and Transport Assessment report which accompanies this planning submission under separate cover.

### 2.2 Item No. II

***Layout: The proposed layout is in accordance with the principals of DMURS.***

**Response:**

Noted. A detailed DMURS report, including a DMURS Statement of Design Consistency, accompanies this submission.

### 2.3 Item No. III

***Connectivity & Permeability: Good. The applicant should extend the red line boundary into Riverwood to connect to existing footpaths.***

**Response:**

Noted. The proposed layout has been revised to include the extension of the red line boundary in the north-eastern part of the subject site connecting to existing footpaths into Riverwood. Please refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100.

### 2.4 Item No. IV

***Taking in-Charge: Public services such as surface water drainage and streetlighting should be located in areas that are proposed to be taken in charge.***

**Response:**

All public services are located in areas that are proposed to be taken in charge. Refer to O'Mahony Pike drawing no. 156E-OMP-00-SP-DR-A9003 Taking in Charge Layout, which accompanies this planning submission under separate cover.

### 2.5 Item No. V

***The development would be constructed and maintained to the Council's standards for taking in charge. All the roads, including footpaths, verges, public lighting, open space, sewers, watermains or drains, forming part of the development, until taken in charge by the Council.***

**Response:**

All roads including footpaths, verges, public lighting, open space, sewers, watermains and drains which form part of the development are designed and shall be constructed and maintained to the Council's standards for taking in charge.

## 2.6 Item No. VI

***Proposed areas for taking-in-charge would be subject to the full rigours of the Council's formal 'taking-in-charge process' prior to any areas being agreed to be taken in charge.***

**Response:**

Noted.

## 2.7 Item No. VII

***The Councils Taking in Charge Policy/Specification Appendix 6 Section 8 states the following: "All roads to be taken in charge will be taken in charge at a minimum from the back of footpath/cycle path on one side of the road to the back of footpath/cycle path on the other side of the road in line with the definition of a road in the 1993 Roads Act Part 1 Section 2(1)".***

**Response:**

All roads to be taken in charge within the subject site are in-line with this Policy/Specification.

## 2.8 Item No. VIII

***The consequence of the above point, is that the Council's taking in charge policy, by default, requires all 'non in-curtilage carparking/on-street car parking spaces' located between the road carriageway and footpath on a street/road proposed to be taken in charge by the Council, to not be designated to any particular unit and to become public carparking spaces, unless otherwise agreed with the Council during the Councils formal taking-in-charge process.***

**Response:**

Noted. There are no on-street parking bays to be taking in charge that are proposed to be designated to any unit. All on-street parking bays will be managed and maintained by a management company and will not be offered for taking in charge.

Please refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100. In addition, refer to Taking in Charge Layout drawing no. 156E-OMP-00-SP-DR-A9003 prepared by O'Mahony Pike, which accompanies this planning submission under separate cover.

## 2.9 Item No. IX

***Metro-Station LAP: This needs to be referenced- Objective 7.7 Reserve an area within the LAP for potential development of a new railway station at Porterstown. There is an area assigned to Dart West Infrastructure for the Pedestrian/Cycle over bridge-Irish rail engagement.***

**Response:**

Whilst Objective 7.7 reserves an area within the LAP for potential development of a new railway station at Porterstown, the Metro West has been excluded from the National Transport Authority's Greater Dublin Area Transport Strategy since 2016, and the DART+ West proposals do not include the provision of a new Porterstown station for rail or light rail. Therefore, the subject site does not include provision for a future station (either light or heavy rail) at Porterstown or a light rail line along Diswellstown Road. Nevertheless, the Proposed Development provides no permanent structures at the location where a potential future rail station could be provided. Further information is provided in Drawing No.'s LS-01-PP, LP-01-IN prepared by Doyle & O'Troithigh and which accompany this submission under separate cover.

Regarding the Dart West Infrastructure, a portion of the north-western part of the subject site is designated for DART+ West infrastructure to facilitate the provision of the proposed level crossing design for the



Porterstown pedestrian crossing station. Please refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100, which accompanies this planning submission under separate cover.

## 2.10 Item No. X

***Internal Layout: Footpath continuity and crossing points and transitions to permitted developments should be shown more in detail.***

**Response:**

Footpath continuity, crossing points and transitions to permitted developments have now been shown more in detail. Please refer to drawing no. STM-WMC-ZZ-00-DR-C-100 prepared by Waterman Moylan and which accompanies this planning submission under separate cover.

## 2.11 Item No. XI

***There are some locations where the green spaces could be extended in buildouts on the north south sections of shared road.***

**Response:**

Noted. Please refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100, showing the green spaces that been extended in buildouts on the north-south sections of the shared roads.

## 2.12 Item No. XII

***Access or maintenance requirements for the bridge? Access or wayleaves required for FCC – further engagement required. Engineering details and material and drawings cross sections etc are required.***

**Response:**

Noted. Please refer to O'Mahony Pike drawing no. 156E-OMP-00-SP-DR-A9003 Taking in Charge Layout, to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100 Road Layout and Levels, and to Doyle O'Troithigh LP-01-PP Landscape Plan, LS-01-PP Landscape Section, LP-01-IN Landscape Plan, all of which accompany this planning submission under separate cover.

## 2.13 Item No. XIII

***Parking: FCC Zone 1 within 1.6km of the train station Accessible – 850m to 1km/hr walking distance to Coolmine train Station via River wood square- should include a link from the development under the bridge existing footpath.***

**Response:**

Noted.

Clonsilla Railway Station is located approximately 1800m to the north-west of the site and Coolmine Railway Station is located approx. 1100m to the north-east of the site, via the existing roads within the surrounding residential areas. These distances can be reached in approx. 25-minute walk or c. 6-minute cycling, and in c. 16-minute walk or some 5-minute cycling, respectively.

The greenway along the north bank of the Royal Canal, which has the potential to reduce both distance and walking time, is currently closed.

Please refer to Section 3.5.4 of the Traffic and Transport Assessment report which accompanies this response under a separate cover.

Please see the Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100, showing a link from the development under the bridge existing footpath.

## 2.14 Item No. XIV

***Terms of SRCSG Max 1.0 per unit and 1.5 for accessible. Query on Visitor parking proposed***

**Response:**

Noted. As per Chapter 5.3.4 and Table 3.8 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, the subject site falls under an Accessible Location: The nearest bus stop is approx. 450m away (c. 5-minute walking) which is served by the routes 37 and 70n. The route 37 has a frequency of 5-10 minutes during both peak hours. With the implementation of BusConnects routes, the route 64 will run every 8-15 minutes during the AM and PM peak hours. Furthermore, the nearest Railway Station is located approx. 1100 m from the Subject Site, which is served by the Dublin - M3 Parkway – Longford route. The frequency of service is 3-15 minutes during both peak hours. Following the implementation of the DART+ West service, it is expected the rail frequency will be increased to five minutes during all day.

As a result, for Accessible Location, the guidelines identify a maximum rate of 1.5no. car parking spaces per dwelling.

It is important to note that the Guidelines indicates that “*The maximum car parking standards do include provision for visitor parking*” (SRCSG, p. 58).

A comprehensive assessment to determine the maximum number of car parking spaces in accordance with this Standard is provided in Section 10.1 of the Traffic and Transport Assessment Report, which accompanies this planning submission under separate cover.

## 2.15 Item No. XV

***The compact settlement guidelines include visitor parking in the maximum rates, and no visitor parking is required within zone 1 for the FCC CDP. There is scope to reduce parking by a few spaces, if necessary, in the design.***

**Response:**

Noted.

The proposed car parking spaces are within the range set out in the Fingal Development Plan for Zone 1 and the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities for Accessible Location.

The proposed development is within Zone 1 of the Fingal Development Plan 2023-2029 as the Coolmine Rail Station is approx. 1,100 metres away from the site. In addition, the Clonsilla Rail Station is currently 1,800 metres from the site via the road network of the surrounding developments, but upon completion of the Kellystown Link Road, the distance between the site and Clonsilla Rail Station will be reduce to some 1450 metres.

Furthermore, the proposed development fall within accessible location of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities due the nearest bus stop is approx. 450m away (c. 5-minute walk) which is served by the routes 37 and 70n. The route 37 has a frequency of 5-10 minutes during both peak hours. With the implementation of BusConnects routes, the route 64 will run every 8-15 minutes during the AM and PM peak hours.

It is important to note that certain residents within the site will be situated at a greater distance from Coolmine Rail Station, beyond the boundary designated as Zone 1 in the Fingal Development Plan (as

referenced in Section 10.1.4 above). Consequently, the proposed car parking provision is considered to offer an appropriate balance between the relevant standards, considering the site's location, current and future accessibility for residents, and the range of housing typologies proposed.

Please see section 10.1 of the Traffic and Transport Assessment Report which accompanies this planning submission under separate cover and includes amendments to the proposed parking.

## **2.16 Item No. XVI**

***Cycle Parking – proposal acceptable – location of the blocks to the rear of the existing Traveller Accommodation development may need further consideration.***

**Response:**

Noted. Cycle parking has now been shown more in detail. Please refer to O'Mahony Pike Drawing nos. 1506E-OMP-00-SP-DR-A-1400 Bicycle Parking Layout, 1506E-OMP-00-ZZ-DR-A-5000 Bicycle Stores & 1506E-OMP-00-ZZ-DR-A-5001 Bicycle Stores, which accompany this planning submission under separate cover.

## **2.17 Item No. XVII**

***EV Parking: EV parking in this type of layout cannot be designated to any unit. If the area is to be taken in charge.***

**Response:**

Noted. Refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100 Road Layout and Levels, and to O'Mahony Pike drawing No.'s 156E-OMP-00-SP-DR-A9003 Taking in Charge Layout & 1506E-OMP-00-SP-DR-A-1500 Car Parking Layout, which accompany this planning submission under separate cover.

### **3. Response to Water Services Items**

#### **3.1 Item No. I**

***The site is wholly in Flood Zone C and therefore appropriate for development.***

**Response:**

Noted. A Flood Risk Assessment has nonetheless been prepared and accompanies this submission. The Flood Risk Assessment considers the risk of flooding from tidal, fluvial, pluvial, groundwater and human/mechanical error, assessing the likelihood, consequence, and risk of each. Where a flood risk is identified, mitigation measures have been implemented.

#### **3.2 Item No. II**

***The surface water drainage strategy, design and details are acceptable.***

**Response:**

Noted. The final surface water strategy is the same as presented at Stage 2. The strategy incorporates a Storm Water Management Plan through the use of various SuDS techniques to treat and minimise surface water runoff from the site. Attenuation and flow control are provided at the end of the SuDS Treatment Train, before discharging to the public network. For full details of the proposed surface water drainage strategy, please refer to Section 3 of the accompanying Engineering Assessment Report.

#### **3.3 Item No. III**

***Water Services have no comments or questions.***

**Response:**

Noted. The drainage and water supply strategies are set out in the accompanying Engineering Assessment Report.



# UK and Ireland Office Locations

