

Planning
Application
Report –
Further
Information
FCC Reg. Ref.
LRD0052/S3

St. Mochta's LRD

Proposed Large-Scale
Residential
Development

At lands in the
Townland of
Porterstown, Clonsilla,
Dublin 15.

For Castlehorn
Developments
Luttrellstown Limited

December 2025

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1 INTRODUCTION

We, Stephen Little & Associates, Chartered Town Planners and Development Consultants, 26/27 Upper Pembroke Street, Dublin 2, D02 X361 are instructed by our client ("the Applicant"), Castlehorn Developments Luttrellstown Limited, Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6, to prepare this response to Further Information Planning Report.

It forms part of the response to the Planning Authority's Request for Further Information, dated 31st July 2025. The proposed LRD development applied for consisted of 302no. residential units in a mix of houses, duplexes and apartments ranging from 2 – 7 storeys in height comprising:-

- 97no. Houses (62no. 3-bed and 35no. 4-bed) ranging in heights of 2-3 storeys
- 205no. Apartment / Duplex Units (98no. 1-bed, 88no. 2-bed and 19no. 3-bed) across 4no. blocks comprising:
 - Block D ranging in height from 5-7 storeys accommodating 57no. apartment units;
 - Block E ranging in height from 5-7 storeys accommodating 77no. apartment units;
 - Block F ranging in height from 4-5 storeys accommodating 29no. apartment units and 10no. duplex units;
 - Duplex Blocks G1, G2, G3 & G4 3 storeys in height accommodating 32no. duplex and simplex units;
- The provision of 241no. car parking spaces and 993no. bicycle parking spaces;
- Private, communal and public open space provision including a new children's playground and active recreational facilities as well as all associated landscaping and boundary treatments;
- Vehicular access is provided off the existing Kellystown Link Road via the internal roads of Luttrellstown Gate (Phase 1).

The site is located within the Kellystown Local Area Plan development boundary and predominately in use as football pitches for St. Mochta's Football Club. A new purpose-planned sportsground for St. Mochta's FC formed the subject of a concurrent planning application with Fingal County Council issuing a final grant of permission on 19th June 2025. (Reg. Ref. FW25A/0033E). The site is generally bounded to the north by the Royal Canal and Dublin- Maynooth rail line, Diswellstown Road/ Dr. Troy Bridge to the east, by permitted Strategic Housing Development (ABP-312318-21 as amended by LRD0034/S3) known as Luttrellstown Gate (Phase 1) to the south and west.

We are pleased to note the generally positive assessment of the proposed development by the Planning Authority (see Section 2 below). We welcome this opportunity to provide Further Information and clarification to the Planning Authority in relation to those specific matters it has raised in its letter dated 31st July 2025.

The Applicant's formal Further Information response comprises this Report and the accompanying Further Information plans and particulars enclosed herewith. A list of enclosures is provided at the end of this Report.

The Applicant's Further Information response has been prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants with significant inputs from: -

- Waterman Moylan Consulting Engineers
- Enviroguide Environmental Consultancy
- O'Mahony Pike Architects
- Castlehorn Developments Luttrellstown Limited

We trust this submission will assist the Planning Authority in its further assessment of same and determination of the application.

2 PLANNING AUTHORITY'S ASSESSMENT

From our review of the Planning Authority's assessment (Planner's Report) and its request for Further Information, it is clear that the Planning Authority is generally satisfied with the broad principle and design approach of the proposed development.

The residual Further Information and clarification issues raised by the Planning Authority in its request for Further Information are addressed further below in this report, and in the plans and particulars that accompany the Applicant's Further Information Response.

2.1 Principle of Proposed Development

The application site is subject to the Zoning Objective "RA – Residential Area", as part of the wider new residential neighbourhood development planned for Kellystown.

Zoning objective 'RA – Residential Area' seeks to:

"Provide for new residential community subject to the provision of the necessary social and physical infrastructure."

The vision of this zoning objective is to:

"Ensure the provision of high quality environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities."

The Development Plan confirms that residential uses are 'permissible' under the RA zoning objective.

In their assessment of the application, the Planning Authority recognise that the site is subject to the 'RA- Residential Area' land use zoning, where they conclude that,

"Having regard to the land use zoning, the proposed development is considered to be acceptable in principle under the 'RA – Residential Area' land use zoning."

2.2 Density

The proposed development of 302no. dwellings comprising house, duplex and apartment units provides a net residential density of 76no. dwellings per hectare.

The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) sets national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. The 2024 Guidelines replace the Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities (2009).

Under the 2024 Guidelines, the application site can be reasonably categorised as a 'City – Suburban / Urban Extension'. Within these areas, the guidelines note,

*"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the **range 40 dph to 80 dph (net)** shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that **densities of up to 150 dph (net)** shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8)."*

The Guidelines' recommended density range, being an objective but not a Specific Planning Policy Requirement (SPPR), provides a degree of flexibility. The proposed development delivers a residential density of 76no. dph, which is consistent with the range recommended in the Guidelines.

In respect to proposed residential density, the Planning Authority concur with the classification of the site under the Compact Settlement Guidelines as a 'City – Suburban / Urban Extension' and concludes that,

"Therefore, the proposed density is within the acceptable range for a 'City – Suburban / Urban Extension' site as per the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)."

2.3 Core and Settlement Strategy

Within the FCC Planners Report, it is acknowledged that the Fingal Development Plan 2023–2029 designates Castleknock LEA as part of the Dublin City and Suburbs Consolidation Area to support housing and population growth. The plan prioritises compact growth near public transport to meet future housing needs. Castleknock LEA has a target of 2,623 housing units, with 509 already permitted, ensuring sufficient capacity. It is concluded that,

"The proposed development will actively contribute towards achieving the housing targets required to support the sustainable and planned growth of the settlement and the wider Blanchardstown Metropolitan Area."

2.4 Building Height

The scheme proposes a variety of building heights in response to site conditions and considered in the context of the scale of the settlement, neighbourhoods and the buildings.

The buildings along the eastern edge of the application site vary in height from 3 - 7 storeys. The 7-storey elements are located in the northeast corner of the site, corresponding with where a "Gateway building is indicated in the Kellystown LAP, and in the southeast corner adjoining permitted Luttrellstown Gate Phase 1 Block A. The building heights along the eastern side of the scheme provide a strong urban edge to the Eastern Development Area of the Kellystown LAP, having regard to the site boundary condition created by the Dr Troy Bridge - Diswellstown Road Overpass.

The buildings along the northern site boundary vary in scale from 3 - 7 storeys, providing a strong urban edge and passive surveillance to the railway and the Royal Canal. The proposed 3-storey duplex buildings create an appropriate urban block with buffering communal open space to the traveller accommodation site.

The Planning Authority acknowledge that the applicant has set out their third response to the 'Development Management Criteria' as required by SPPR 3 of the Building Height Guidelines. The Planning Authority affirm,

"Given the proximity of the site within the Dart+West corridor and BusConnects projects, the Planning Authority is satisfied in principle with the suitability of the site for higher buildings. Taking into consideration the submitted Site Sections and CGI Photomontages, the proposed building heights are deemed compatible with the approved high density development in the immediate vicinity."

2.5 Visual Amenity

The Planners Report acknowledges that the application site is located to the south of the Royal Canal (RPS 944a) and protected structures of Keeper's Cottage (RPS 699) and Kennan Bridge (RPS 698) adjoin the site to the north.

In respect of visual amenity, the Planning Authority state,

“The Planning Authority have reviewed the submitted photomontages, from critical viewpoints, including areas around the protected structures, and deem the proposed development visually pleasing. Given that the proposed DART+West cycle/pedestrian bridge is to be located between the application development and the protected structures to the north-west, the Planning Authority are satisfied that the proposed development will not negatively visually impact the setting of the protected structures.

In terms of the visual impact of the development on the Royal Canal (RPS 944a), the Planning Authority are satisfied with the separation distance provided between the existing Royal Canal and the proposed development. Given that the proposal includes a road, parking, pedestrian/cycle path and landscape buffer within the application site, and the trainline is directly adjacent to the site, the Planning Authority are content the proposed development shall not have a significant negative visual impact on the Royal Canal (RPS 944a).”

2.6 Childcare Facilities

Having regard to the requirements of the Childcare Guidelines, it is submitted that the creche on the ground floor of Block B, permitted within the Kellystown SHD scheme, has been designed with sufficient capacity to cater for the childcare space requirements of the consented Luttrellstown Gate Phase 1 scheme, subject application and concurrent Luttrellstown Gate Phase 2 scheme (99no. dwellings).

The Planning Authority agreed with the above conclusion and noted,

“The submitted ‘Community and Social Infrastructure Audit Report’ has satisfied the Planning Authority that adequate childcare provision has been permitted through Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3. The use of these childcare facilities for this development shall be dealt with by condition should permission be considered by the Planning Authority”.

2.7 Residential Amenity

In their assessment of residential amenity provided within the scheme, the Planning Authority generally note that the proposed development includes 302 residential units, with a good mix of apartment types. Over half of the apartments (53%) are dual aspect, exceeding the minimum requirement of 25%. In addition, 38% of the units are larger than the minimum size standards by at least 10%, and all ground-floor apartments achieve the required ceiling height of 2.7 metres. The Housing Quality Assessment confirms that all units provide satisfactory internal storage, which the Planning Authority finds acceptable.

Private amenity space is provided for all dwellings, either through balconies, terraces, or rear gardens. The balconies and patios meet depth and area standards, while houses have private gardens that comply with national guidelines. The design of duplex blocks near St Brigid’s Halting site minimises any potential overlooking by placing non-habitable rooms along sensitive boundaries. Overall, the layout is considered appropriate and protective of neighbouring residential amenity.

Daylight and sunlight assessments show that 83% of units comply with the Sunlight Exposure standard. For the minority of units falling below the threshold, compensatory measures such as larger floor areas, additional private/communal open space, and dual aspect layouts ensure quality living conditions. Furthermore, 97% of communal open spaces achieve compliance with BRE guidelines, ensuring good access to sunlight for shared outdoor areas.

The Planning Authority concludes that the proposed development will deliver an adequate level of residential amenity, with strong compliance on housing quality, private amenity provision, and daylight and sunlight performance.

2.7.1 Water Proposals

The Water Services Department of Fingal County Council have no objections to the proposed development in relation to surface water drainage, subject to condition, and therefore the Planning Authority concur with their opinion.

2.7.2 Transportation

Vehicular access is provided off the existing Kellystown Link Road via the internal roads of the permitted Kellystown development (Reg. Ref. ABP-312318-21, as amended by Reg. Ref. LRD0034-S3). In terms of pedestrian and cyclist infrastructure, the proposal has been designed with a well-interconnected footpath network providing permeability through the site, to the adjacent Kellystown Development. 2m wide footpaths throughout the site are proposed with a cycle path bordering the site to the north and east.

A total of 993no. cycle parking spaces are proposed as part of the development, with 889no. long stay and 104no. short stay cycle spaces. 241 no. car parking spaces are also proposed. A “mobility hub” has been provided, as requested by Fingal County Council. The mobility hub comprises 2 no. Go-Car spaces, visitor & EV car spaces, 6 no. short stay bicycle spaces and a bicycle repair station.

In their assessment of the proposals, the Planning Authority deem the quantum of cycle and car parking proposed to be in accordance with the applicable standards in the Development Plan and/or Compact Settlement Guidelines.

2.8 Appropriate Assessment

An Appropriate Assessment Screening Report, prepared by Enviroguide Consulting accompanied the application. This report concluded that the possibility of significant effects on any of the listed European Sites may be excluded and therefore, there is no requirement to proceed to Stage 2 of the AA Screening process and prepare a NIS.

The FCC Planners Report concludes that,

“Fingal County Council as the competent authority is satisfied with the contents of the submitted AA screening report and concurs with the overall conclusion. It is therefore considered that in view of the best scientific knowledge and in view of the conservation objectives of the relevant European sites, the proposed project, individually or in combination with another plan or project, will not have a significant effect on any European sites. A Stage 2 Appropriate Assessment is not required.”

2.9 Environmental Impact Assessment Screening

An Environmental Impact Assessment Report was prepared for the proposed development and accompanied the initial planning application.

Having assessed each chapter of the EIAR, the Planning Authority conclude,

“Having regard to the above, the likely significant environmental effects arising as a consequence of the proposed development have on the most part, been satisfactorily identified, described and assessed. Whilst the majority of the EIAR is compliant with Article 94 of the Planning and Development Regulations, 2001, as amended, the applicant is requested to submit additional information to address the concerns raised by NPWS regarding the lack of information in relation to the biodiversity, in particular Bats, Birds, and water relating to the Royal Canal. In order to ensure that an up-to-date reasoned conclusion is provided, the Environmental Impact Assessment will be completed following receipt of additional information.”

3 RESPONSE TO RFI ITEMS

We welcome the opportunity to provide further information and/or clarification in respect of the particular issues raised by the Planning Authority. We trust that our Further Information response will assist the Planning Authority in its further assessment and determination of this planning application.

Below, each of the items of further information is quoted in sequential order, followed in turn by the Applicant's Response to each item.

The responses below should be read in tandem with the plans and particulars that together form the 'Applicant's Response' (see Enclosures). Cross reference to the relevant material is provided for ease of reference.

3.1 Item 1 – Biodiversity EIAR

The applicant is requested to address and update accordingly the following aspects of the Environmental Impact Assessment Report (EIAR) raised by the Department of Housing, Local Government and Heritage in their submission with respect to Chapter 6 - Biodiversity

- a) The applicant is requested to submit an assessment of the possible effects of the proposed development on bat species based on dusk and dawn bat activity surveys of the development site to be carried out by bat specialists during the period of the year when bats are most active from May to August.***
- b) The applicant is requested to submit an assessment of the possible effects of the proposed development on breeding bird species based on bird surveys of the development site undertaken during the main bird breeding season from April to August.***
- c) The applicant is requested to submit an evaluation of the potential effects of dust transported from the proposed development during its construction phase into the Royal Canal pNHA adversely affecting the water quality and the ecology of this area***

Applicant's Response to Item 1

From the outset, we note that the Environmental Impact Assessment Report (EIAR) that accompanied the subject application considered both the subject site and the 99no. unit scheme referred to as 'Luttrellstown Gate Phase 2'. The latter scheme (Reg. Ref. FW25A/0233E) was refused permission on 24 July 2025.

Due to the refusal of permission for FCC Reg. Ref. FW25A/0233E, the enclosed Biodiversity Chapter addresses only the subject St. Mochta's LRD Scheme. For clarity, the EIAR assessed the two sites independently, with separate consideration of potential impacts, effects, and mitigation measures. Accordingly, the refusal of permission for the Luttrellstown Gate Phase 2 scheme has no bearing on the findings of the EIAR in respect of the subject LRD scheme, and the conclusions and mitigation measures proposed remain valid.

In relation to Further Information Item 1, we refer the Planning Authority to the enclosed EIAR Biodiversity Chapter Addendum which supplements the Biodiversity Chapter of the Environmental Impact Assessment Report (EIAR) submitted with the application. The original Biodiversity Chapter of the EIAR remains applicable, with its assessment, findings, and mitigation measures unchanged. The purpose of this Addendum is solely to provide clarification and supplementary information in relation to the specific biodiversity issues identified in the Further Information request.

We would note that any updates to the chapter in response to the Further Information Request are in red coloured font for ease of assessment.

- a) The Biodiversity EIAR Chapter has been updated to provide an assessment of the possible effects of the proposed development on bat species based on dusk and dawn bat activity surveys. This is presented in Section 6.3.1.4.2.2, 6.5.2, 6.5.3 and 6.6.2.4 and Table 6.7 of the Biodiversity EIAR Chapter.

The assessment notes that,

“Two dusk activity surveys were conducted at the Site on 20th August 2025 and 1st September 2025. Weather conditions were suitable for these surveys according to the guidance outlines in Collins (2023).

During the bat activity surveys, three species of bats were recorded. These include the common pipistrelle (Pipistrellus pipistrellus), soprano pipistrelle (Pipistrellus pygmaeus) and Leisler’s Bat (Nyctalus leisleri). All three species were primarily recorded along the central hedgerow, and woodlands along the eastern boundary of the Site, with a few individuals recorded along the central hedgerow of the Site.

The two rounds of transect surveys revealed valuable information in relation to bat usage of the Site. Only a low number of bats were recorded using the Site for commuting / foraging, specifically near the hedgerow habitats and woodland habitats of the Site, where most commonly occurring species in Ireland namely, common pipistrelle, soprano pipistrelle and Leisler’s bat, were recorded. Given that common pipistrelle, soprano pipistrelle and Leisler’s bat were also recorded within the 10km grid square encompassing the Site, it is presumed that the Site may support locally important populations of these common bat species for commuting and foraging, and of no importance to roosting populations of bat species in the local area. For these reasons, the Site of the Proposed Project has been assigned local level of importance for commuting and foraging bats, and less than local importance for roosting bats.”

Appropriate mitigation is proposed inclusive of bat friendly lighting as well as noting that additional green spaces proposed for the site will positively impact and offset some of the negative impacts from the loss of habitats for bats. As presented in Section 6.6.2.4, four summer bat boxes will be erected on site.

As confirmed in Table 6.21 of the Chapter, when the proposed mitigation has been implemented, the quality of the impact changes to positive.

- b) The Biodiversity EIAR Chapter has been updated to provide an assessment of the possible effects of the proposed development on breeding bird species based on bird surveys of the development site. This is presented in Section 6.3.1.4.3.2.2, 6.5.2, 6.5.3 and 6.6.2.6 and Table 6.7 of the Biodiversity EIAR Chapter.

Breeding Bird surveys occurred on 14th August 2025, 20th August 2025, and 27th August 2025.

When evaluating the results of the survey, the chapter notes,

“Considering the variety of bird species recorded both in the historical records and during the scoping and breeding bird surveys, it is considered that the Site contains resident and regularly occurring, locally important populations of bird species protected under the Wildlife Act, where the habitats on Site may provide suitable breeding habitats for these species. While red and amber listed bird species were recorded on Site, these species were not observed nesting or breeding at the Site itself. For these reasons, the Site of the Proposed Project has been assigned local level of importance for bird species.

Although negative impacts are envisaged due to the loss of suitable breeding habitats for bird species, the planting of street trees, woodlands, scrub and enhancement of hedgerows for the Operational Phase of the Proposed Development will provide a positive impact on bird species.”

As confirmed in Table 6.21 of the Chapter, when the proposed mitigation has been implemented, the quality of the impact changes to positive.

- c) The Biodiversity EIAR Chapter has been updated to provide an evaluation of the potential effects of dust transported from the proposed development during its construction phase into the Royal Canal pNHA adversely affecting the water quality and the ecology of this area. This is presented in Section 6.3.1.2.2, 6.5.2, and Table 6.7 of the Biodiversity EIAR Chapter.

It is concluded that,

“Impacts via air pathways such as dust may have a significant impact on the water quality of the Royal Canal pNHA located 17m from the Site. While there is a significant

vegetation buffer of mature hedgerow of approximately 6m wide along approximately 200m of the northern boundary, and vegetation buffer of 10m along the banks of the Royal Canal extending to 16m in parts, these factors along with the embedded mitigations in the CEMP for the control of dust emission may not significantly negate impacts via this pathway for the Construction Phase of the Proposed Development.

Impacts via air pathways such as dust may have significant impacts on the QIs of the Royal Canal pNHA such as protected floral species and otters (*Lutra lutra*) given the close proximity of the pNHA to the Site in the absence of embedded mitigation measures for dust control during the Construction Phase but not the Operational Phase.

Therefore, it is concluded that impact pathways via dust emission between the Proposed Development and Royal Canal pNHA is considered to potentially be significant, with minor level of impact, which at a national level would identify as slight impact levels to the pNHA."

As illustrated in Table 6.21, Mitigation 2: Standard surface water and ground water protection measures and Mitigation 3: Reduction of Dust Related Impacts relate to dust impacts on the Royal Canal. When mitigation has been implemented, the residual impact is imperceptible.

3.2 Item 2 – *Iarnród Éireann*

The applicant is advised that *Iarnród Éireann* have raised a number of concerns in relation to the proposed development. In this regard the applicant is requested to address the following items:

- a) *Iarnród Éireann* noted in their submission that the boundary of the planning application, as currently presented in the planning drawings, does not accurately reflect the ownership held by *Iarnród Éireann* /C.I.É. Specifically, the plans appear to show an encroachment into *Iarnród Éireann* /C.I.É lands, where an area has been incorrectly labelled as being "assigned to DART+ West infrastructure."

In this regard, the applicant is requested to clarify the extent of their land ownership and if the applicant does not have sufficient legal interest in the entire site area as outlined in red on the site layout plan submitted, submit revised drawings to accurately reflect their land ownership and remove any reference that lands are being assigned or transferred to the DART+ West Project.

- b) *Iarnród Éireann* noted in their submission that the proposed residential development is located on lands which are identified as critical to the delivery of the DART+ West Project, including of temporary and permanent acquisition.

*In this regard, the applicant is requested to clarify the impact that this will have on the proposed development. The applicant is also requested to engage with *Iarnród Éireann*/C.I.É and the DART+ West Project Team in order to reach an agreement regarding the use and access to these lands to ensure that the development does not impede or delay the construction and delivery of the DART+ West Project.*

- c) *Iarnród Éireann* noted in their submission that the boundary of the proposed development lies directly adjacent to the Broadstone to Sligo Railway Line. The site boundary shown on the plan drawings assumes that the property boundary to railway lands corresponds with the OSi mapping or existing fence lines. This approach is unreliable and may not reflect the full extent of railway lands acquired to construct, maintain and operate the railway. The applicant is therefore requested to engage with the third-party co-ordinator by email 3rdpartyapprovals@irishrail.ie and provide detailed cross sections with a view to agreeing the line of the proposed boundary.

*In this regard and following engagement with *Iarnród Éireann*, the applicant is requested to submit revised drawings to accurately reflect their land ownership*

Applicant's Response to Item 2

In the first instance, we refer the Planning Authority to the enclosed letter from Iarnród Éireann and accompanying Phasing Plan prepared by O'Mahony Pike Architecture.

- a) In respect of the boundary of the planning application, Iarnród Éireann confirm in their enclosed cover letter that,

"Castlethorn have separately furnished us and our technical advisors with CAD drawings of their proposed development, and we are satisfied with the boundary lines and development setbacks proposed as part of their subject LRD planning application."

We would like to clarify, the extent of the red line remains unchanged from application stage following correspondence with Iarnród Éireann.

- b) The applicant confirms that extensive engagement has taken place with Iarnród Éireann and the DART+ West Project Team, and agreement has been reached regarding the safeguarding of lands required for the delivery of the DART+ West Project. Within the enclosed letter, it is stated that,

"We wish to confirm our satisfaction with that Phasing Proposal, which would safeguard a suitable compound for the DART+ West Project plus a haul road access down to the Luttrellstown Link Road, as indicated in Figure 1 below, to facilitate the required DART+ West works at this location, comprising of a pedestrian overbridge, road junction upgrades in the area and the electrification of the railway line. We are separately engaged with Castlethorn about the possibility of those required junction upgrade works being carried out by Castlethorn as a separate works contract, but we are satisfied in any event that the proposed DART+ West compound and haul route would be sufficient to facilitate Iarnród Éireann and our appointed contractor in carrying out all required DART+ West works at this location if that is the ultimate outcome."

We note also that Iarnród Éireann have requested that Fingal County Council attach a condition to any grant of planning permission as detailed in the attached letter.

- c) In respect of the boundary of the planning application, Iarnród Éireann confirm in their enclosed cover letter that,

"Castlethorn have separately furnished us and our technical advisors with CAD drawings of their proposed development, and we are satisfied with the boundary lines and development setbacks proposed as part of their subject LRD planning application."

We would like to clarify, the extent of the red line remains unchanged from application stage following correspondence with Iarnród Éireann.

3.3 Item 3 – Transportation

In order for the Transportation Planning Section to fully assessed the proposed development, the applicant is requested to address the following:

- a) The applicant is requested to submit a cross-section of Porterstown Road and the development.***
- b) Cross sections 5-5 and 4-4 are shared surface roads with tree pits and a service corridor but the total width of the road space hard surfacing is up to 7m in places. Further discussion is advised in relation to the shared surface areas.***
- c) The applicant is requested to submit revised drawings which include the transitions of the roads, footpaths and active travel links from the proposed development to the permitted developments.***
- d) A Stage 1 Road Safety Audit must be completed and submitted by the Applicant.***

Applicant's Response to Item 3

In the first instance, we refer the Planning Authority to the enclosed Engineering Further Information Response Letter prepared by Waterman Moylan Consulting Engineers.

- a) The Waterman Moylan Response Letter confirms that a cross section of Porterstown Road and the subject development has been included within this Further Information Response – refer to STM-WMC-ZZ-00-DR-C-101 Porterstown Road Interface.

The response further notes that,

“The existing Porterstown Road is being upgraded as part of the adjacent Strategic Housing Development, currently under construction under planning reference SHDW/004/21 / ABP-312318-21. The upgrade works include provision of a new footpath, 2-way cycle track and verge on the western side of the road. The existing Porterstown Road has a varying carriageway width, so the western kerb is also being realigned to ensure a consistent width is provided along the length of the road.

On the eastern side of the carriageway, there is an existing verge/ditch taking runoff from the existing road, and an existing hedgerow providing buffer planting between the road and the subject site. The existing ditch and hedgerow are to remain unaltered under the subject development.

Waterman Moylan met with Niamh O'Connor from Fingal County Council's Transportation Section on the 21st August to discuss the additional information responses. The accompanying drawing no. STM-WMC-ZZ-00-DR-C-101 was presented at that meeting, and it was agreed that the interface between the site and Porterstown Road is acceptable in principle.”

- b) The Waterman Moylan Response Letter confirms that the design has been coordinated to facilitate best practice in traffic calming as outlined in DMURS.

It is further noted that,

“The proposed layout was subject to a Quality Audit, including a Stage 1 Road Safety Audit, carried out by an external auditor, Traffico. The full report is included in Appendix A, and is discussed further in Section 2.4, below.

The proposed shared surface carriageway width and speed reducing measures were discussed with Niamh O'Connor from Fingal County Council's Transportation Section on the 21st August, and FCC confirmed that the proposed homezone layout was considered acceptable in principle.”

- c) The Waterman Moylan Response Letter confirms that a cross section of Porterstown Road and the subject development has been included within this Further Information Response – refer to STM-WMC-ZZ-00-DR-C-101 Porterstown Road Interface, illustrating the transition of roads, footpaths and active travel links from the proposed developments to the adjacent permitted development.

It is further noted that,

“The proposal includes 2 no. vehicular accesses to the subject site: 1 no. vehicular connection to the existing Porterstown Road, and 1 no. vehicular connection to the south, to a new permitted road to be constructed as part of the permitted apartment block (LRD0034/S3), which in turn connects to Porterstown Road south-west of the development.

The northern vehicular connection to Porterstown Road is adjacent to the permitted Kennan Drive, forming a new crossroads. This is a priority junction and incorporates pedestrian crossings with tactile paving. There is a new 2-way cycle track under construction on the western side of the carriageway, with Stop markings set back to ensure vehicles yield to cyclists, in accordance with the Cycle Design Manual.

Additional Active Travel permeability is provided, with a shared pedestrian and cycle route proposed around the northern and eastern perimeters of the site. At the north-

west of the subject site, this Active Travel route includes a crossing over the Porterstown Road, connecting to the new footpath and 2-way cycle track under construction as part of the adjacent development. At the south-eastern corner of the site, this Active Travel route connects with the cycle and pedestrian infrastructure permitted as part of the adjacent apartment block (LRD0034/S3).

The accompanying drawing no. STM-WMC-ZZ-00-DR-C-101 was presented at the meeting with Niamh O'Connor from Fingal County Council's Transportation Section on the 21st of August. It was agreed in principle that the proposed transitions of the roads, footpaths and active travel links are appropriate."

- d) The Waterman Moylan Response Letter confirms that a Quality Audit, including a Stage 1 Road Safety Audit, was prepared by Traffico in May 2025. The full audit report was included in Appendix C of the Engineering Assessment Report, and is now appended to the enclosed response report – _refer to Appendix A. Several items were raised by the auditor, and the comments were taken on board in the design, as set out in the feedback form included in the final audit report.

4 CONCLUSION

We welcome this opportunity to provide further information in relation to specific matters raised by the Planning Authority. We trust that the enclosed material provides sufficient comfort to the Planning Authority in respect of the proposed development, to enable it to arrive at a favourable decision.

It remains our opinion that the proposed development is compliant with national, regional and county level planning policy guidance for residential development and will deliver a high-quality residential scheme. This includes compliance with the policies, objectives and design standards of the Fingal County Development Plan 2023-2029 and Kellystown Local Area Plan 2021.

It is also our professional planning opinion that the proposed revisions as a result of the further information requests are minor in nature to the overall development. It is concluded that there are no significant adverse planning impacts predicted arising from the proposed development and the proposal is otherwise consistent with the proper planning and sustainable development of this particular area.

It is our understanding that the proposals included in this submission are therefore compliant with the provisions of the Planning Scheme and are consistent with the requirements of the Planning Authority also.

We confirm that we continue to act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

5 ENCLOSURES

The following plans and particulars are included with this further information response to Fingal County Council:

1. Biodiversity EIAR Chapter prepared by DNV.
2. Phasing Plan prepared by O' Mahony Pike Architects.
3. Letter from Iarnród Éireann.
4. Engineering Further Information Response Report prepared by Waterman Moylan Consulting Engineers.
5. Cross Section Drawing prepared by Waterman Moylan Consulting Engineers.

STEPHEN LITTLE & ASSOCIATES
December 2025

Stephen Little & Associates are committed
to progressing and achieving sustainable
development goals.

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