

LRD Planning  
Application to  
Fingal County  
Council

Response to  
LRD Opinion

**St. Mochta's LRD**

Proposed Large-Scale  
Residential  
Development

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

For Castlethorn  
Developments  
Luttellstown Limited

**JUNE 2025**

**Document Control: -**

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## 1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners and Development Consultants have been instructed by our client, Castlethorn Developments Luttrellstown Limited (*“the Prospective LRD Applicant”*), Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6., to prepare this Response to LRD Opinion to accompany a planning application for Large-Scale Residential Development (LRD).

We can confirm that an LRD Stage 2 meeting was held with the Planning Authority on 13<sup>th</sup> March 2025 as required under Section 32 of the Planning & Development Act 2000, as amended.

Within 4 weeks of the date of that meeting, Fingal County Council issued an LRD Opinion that the documentation submitted in accordance with Section 32B of the Act constitutes a reasonable basis for an LRD application, subject to the applicant addressing the issues raised in the Opinion.

This document provides the Applicant’s response to the specific issues in the LRD Opinion.

We refer otherwise to the Planning Application Report and Statement of Consistency for confirmation that the proposed scheme is consistent with the relevant National and Regional strategic planning policies, with the relevant Ministerial Guidelines and with the policies and objectives of the current Fingal County Development Plan 2023-2029 and Kellystown Local Area Plan 2021.

## 2 DESCRIPTION OF PROPOSED DEVELOPMENT

Following s.247 consultation and the Section 32C LRD meeting with the planning authority, planning permission is now sought for the proposed LRD development described in brief as follows: –

The application site (c.4.39 ha) is located within the Eastern Development Area (DA1) of the Kellystown Local Area Plan. It is predominately occupied by football pitches and club house facilities, in use by St. Mochta’s Football Club.

The site has an existing vehicular site entrance from and frontage to the Old Porterstown Road along its western boundary. St Brigid’s Traveller Accommodation site shares frontage with the Porterstown Road, to the south west corner of the site.

The site is otherwise generally bounded by Diswellstown Road/ Dr. Troy Bridge to the east, the Royal Canal and the Dublin-Maynooth Railway Line to the north, Abbey Cottage to the north west. It is bounded by permitted Strategic Housing Development (ABP-312318-21 as amended by LRD0034/S3), known as Luttrellstown Gate (Phase 1), to the south and west.

The proposed development consists 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).

Key Statistics	Proposed
Total Number of Units	302no. units
Red Line Area	4.39Ha
Net Site Area	3.96ha
Net Density	76no. units per ha
Unit Mix	<ul style="list-style-type: none"> <li>• 35no. 4 bed houses</li> <li>• 62no. 3bed houses</li> <li>• 19no. 3bed duplex units</li> <li>• 7no. 2 bed duplex units</li> <li>• 81no. 2bed apartments</li> <li>• 98no. 1bed apartments</li> </ul>
Car Parking	241no. spaces
Cycle Parking	993no. spaces

**Table 1: Key Site Statistics.**

Further details can also be found in the Schedule of Accommodation and Housing Quality Assessment, together with the Unit Type drawings, prepared by O'Mahony Pike Architects enclosed with this submission.

The relocation of St Mochta's FC will unlock the LRD application site for development. A planning application (FW25A/0033E) by the same applicant for proposed development relating to the relocation of St. Mochta's Football Club facilities to provide a purpose planned new sportsground facility and clubhouse south of the Kellystown Link Road, is due to be decided by Fingal County Council by 23 June 2025. The relocation of the St Mochta's FC grounds to the lands, zoned Open Space and neighbouring the existing school campus, is in accordance with Key Objective DA 1.1 for the Eastern Development Area of the Kellystown Local Area Plan.



Figure 1: Extract from Proposed Site Layout Plan Drawing prepared by O'Mahony Pike Architecture

### 3 APPLICANT'S RESPONSE TO LRD ISSUES RAISED

#### 3.1 Planning

*The site is within Development Area 1 of the Kellystown lap. In this regard, the proposed development is required to be in compliance with the relevant objectives of the LAP and the Key Objectives DA 1.1-DA1.16.*

- a) Objective DA 1.1 states "provide for the relocation of St. Mochta's Football Club to an appropriate site in the Open Space Area in the southern portion of the LAP land bank in close proximity to the existing schools' campus. The relocated facilities shall be constructed and finished on site by the developer to a suitable standard to be agreed with Fingal County Council prior to the re-development of the existing St. Mochta's Football Club site".*
- b) The Planning Authority acknowledges a current planning application for a clubhouse and playing fields in association with St. Mochtas has been submitted under FW25A/0033E (i.e. the relocation of St. Mochtas). This is appropriate having regard to Objective DA 1.1 of the LAP.*
- c) The applicant should be mindful of Objective DA 1.1 which requires the relocation of St Mochtas to be constructed and finished on site by the developer to a suitable standard to be agreed with Fingal County Council prior to the re-development of the existing St. Mochta's site (subject site). This aspect will be controlled by the Planning Authority, in the event of planning permission being issued.*

#### Applicant's Response

The application site (c.4.39 ha) is located within the Eastern Development Area (DA1) of the Kellystown Local Area Plan and has been designed in accordance with the Kellystown Local Area Plan and in particular, the Key Objectives of the Eastern Development Area. We refer to Section 9.1.1 of the enclosed Planning Application Report and Statement of Consistency prepared by Stephen Little and Associates which responds to each of these objectives in turn.

As acknowledged by the Planning Authority, in accordance with Key Objective DA 1.1, it may be noted that Castlethorn Developments Luttrellstown Limited made a planning application (FW25A/0033E) on 31 January 2025, which seeks permission for the relocation of St Mochta's FC grounds to the 'Open Space' zoned lands south of Kellystown Link Road. On foot of the recent submission of the Applicant's Response to the FI Request, a decision by the Planning Authority is due by 23 June 2025.

It is acknowledged that, in accordance with Objective DA 1.1, construction of the proposed development may only commence once the relocated facilities have been constructed and completed on site by the developer to a suitable standard, to be agreed with Fingal County Council.

- The applicant is required to carry out their due diligence regarding Appropriate Assessment (AA). A Stage 1 AA Screening Report is required. The applicant has noted in their Planning Report that an AA Screening Report will be prepared.*

#### **Applicants Response**

An Appropriate Assessment Screening Report, prepared by Enviroguide Consulting accompanies this application. This report concludes 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 applicant is required to carry out their due diligence regarding Environmental Impact Assessment (EIA). In this regard, the submitted planning report outlines that the applicant has concluded an EIA screening exercise and that an Environmental Impact Assessment Report (EIAR) is being prepared and will be submitted with the LRD application (Stage 3). The Planning Authority concurs with this as the cumulative dwelling unit threshold has been exceeded. Individually the proposed development of 302no units would fall below the threshold for a mandatory EIA for residential development (Section 10(b)i) - "Constriction of more than 500 dwelling units" of Part 2 of Schedule 5 of the Planning and Development Regulations 2001, as amended. However, having regard to the permitted development (374no. units), the cumulative number of units amounts to 676no. units which exceeds the threshold under (Section 10(b)()). An EIAR is required, in this regard.*

#### **Applicants Response**

We confirm that an Environmental Impact Assessment Report has been prepared for the proposed development and is enclosed with the application.

As well as the subject scheme (302no. dwellings), the EIAR considers a concurrent application for 99no. dwellings and the consented Kellystown SHD scheme, including 374no. dwellings (ABP-312318-21, as amended by LRD0034-S3). In combination, the proposed development and these other residential schemes would exceed the mandatory threshold for EIAR.

- The proposed density of 74 units per hectare (uph) is acceptable considering the location and accessibility of the site; density range (up to 150 dph) per the Compact Settlements Guidelines for Planning Authorities (2024) (accessible suburban/urban extension location). The proposed density is also acceptable regarding the density range (50-75 uph) per the Kellystown LAP.*

#### **Applicants Response**

We acknowledge and welcome the above comments from the Planning Authority.

The site can be best described as a 'City – Suburban / Urban Extension' site, located within 1km of high capacity commuter rail stations at Coolmine and 1.5km to Clonsilla, which are also planned to be electrified as part of DART+ West project.



**Figure 2: Site Proximity to Clonsilla and Coolmine Commuter Rail Stations. Extract from Design Statement prepared by O'Mahony Pike Architecture**

As confirmed above, 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. We refer the Planning Authority to Appendix A of this report for further detailed discussion in respect of how the proposed development is consistent with the Compact Settlements Guidelines (2024).

For further context, we refer to the enclosed Architectural Design Statement, prepared by O'Mahony Pike Architects, which demonstrates compliance of the application site and adjoining / adjacent lands with the density ranges identified in the Kellystown Area Plan (see Design Statement, 'Density', p.34). We would highlight that the Kellystown LAP identifies density ranges for Development Areas as opposed to per application / plot.

When the proposed development is considered in combination with concurrent application at Luttrellstown Gate Phase 2 (99no. dwellings) and permitted development at Luttrellstown Gate Phase 1 (SHD ABP-312318-21, as amended by LRD0034-S3) a net residential density of 64no. dwellings per hectare is achieved. This falls comfortably within the range of 50-75 dwellings per hectare required for the Eastern Development Area, consistent with the density objectives of the Kellystown LAP.



We note the importance of providing a viable and sustainable overall residential mix and density within the Eastern Development Area and consider that this has been provided through the permitted and proposed development identified above.



**Figure 3: Density in Context - Extract from Design Statement prepared by O'Mahony Pike Architecture**

We note the Council's acceptance of the proposed density of 76 units per hectare, which is within the acceptable range set out in both the Kellystown LAP and the Compact Settlements Guidelines (2024), and we refer to the O' Mahony Pike Design Statement for further detail.

- *No residential facilities (gym/laundry/concierge/social rooms etc.) are provided in the apartment blocks. This is a concern for the Planning Authority as it would result in an unsatisfactory standard of residential amenity serving future occupants. This should be addressed.*

### **Applicants Response**

We refer to the Architectural Design Statement prepared by O'Mahony Pike Architects which confirms.

*"We note the Planning Authorities' request for the inclusion of residential facilities in the apartment buildings. However, the apartment buildings are not designed as Build-to-Rent accommodation, which generally operates long-term rental arrangements, and where the provision of dedicated amenities and facilities is usually a characteristic element.*

*The apartment buildings have been designed to be fully compliant with the Design Standards for New Apartments and the Fingal Development Plan, and all appropriate regulations, such as dwelling size, mix, room size, communal amenity space, private amenity space and bicycle parking have been complied with. Internal communal amenities or facilities have not been included in order to maintain the financial viability of the project, and to avoid the imposition of management and maintenance costs on future residents. We note that the likely exit for these buildings is through an Approved Housing Body, where the cost per unit is a key metric in order to reach agreement on a successful development agreement*

*We further note Section 4.6 of the Design Standards for New Apartments Design Guidelines "...They should not generally be imposed as requirements by the planning authority in the absence of proposals from and/or the agreement of the applicant. The provision of such facilities is likely to have significant implications for management and maintenance costs for future residents."*

- *No community facilities have been proposed. A Community and Social Infrastructure Audit is required, per Objective DMSO78 of the Fingal Development Plan 2023-2029. a. Any social infrastructure/community facility needs to be attractive, of a high-quality design, visually interesting and have regard to Objective DMSO77 of the Fingal Development Plan 2023-2029.*

#### **Applicants Response**

We refer to the enclosed Community and Social Infrastructure Audit prepared by Stephen Little & Associates as requested in accordance with Objective DMSO78 of the Fingal Development Plan 2023-2029 which finds that the area is well serviced in terms of community infrastructure.

- *A detailed phasing plan is required, per Section 14.9.1 of the Fingal Development Plan 2023-2029.*

#### **Applicants Response**

We refer to the enclosed O' Mahony Pike Architects Design Statement which includes details on phasing.

- *A full Daylight and Sunlight Analysis is required, per Objective DMSO22 of the Fingal Development Plan 2023-2029.*

#### **Applicants Response**

As required by Objective DMSO22 of the Fingal Development Plan 2023-2029, a full Daylight and Sunlight Assessment has been prepared by Modelworks and is enclosed with this application.

- *The development is required to provide 10% of the units as age friendly accommodation, per Objective DMSO37 of the Fingal Development Plan 2023- 2029.*

#### **Applicants Response**

We refer to the Architectural Design Statement prepared by O'Mahony Pike Architects which confirms,

*"10% of the proposed housing units are designed to be age friendly accommodation, in accordance with Objective DMSO37 of Fingal Development Plan 2023-2029.*

*These units comply with the principles set out below:*

- *is well connected to local amenities*
- *is connected to the outdoors*
- *has accessible and adaptable toilets & bathrooms*
- *has easy to use fittings and fixtures*
- *has good security & technology system*
- *is easy to approach and enter*
- *is easy to move about in*
- *has a guest bedroom*
- *is energy and cost efficient.*

*The design team has referenced the publication "Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly Home" by Age Friendly Ireland, and some of these features are referred to in the diagrams on these pages.*

*The proposed age-friendly units include the following:*

- 12 no. H4A houses;
- 5 no. 3B/5P duplexes in Block F;
- 8 no. 2B/4P apartments in Block F;
- 1 no. 2B/3P apartment in Block F;
- 10 no. 2B/4P apartments in Block E;

*We note that in addition to the Age-Friendly units listed above, all of the 1 bedroom units in Block F are Universal Design units, which will make this building attractive as a sheltered housing or age-friendly community."*

- *A landscape/visual assessment is required, per Objective DMSO162 of the Fingal Development Plan 2023-2029. Internal views/photomontages of the proposed development should also be provided.*

#### **Applicants Response**

Please refer to enclosed Landscape and Visual Impact Environmental Impact Assessment Chapter prepared by Doyle & O'Troithigh Landscape Architects in accordance with *Objective DMSO162 of the Fingal Development Plan 2023-2029*.

Internal views/photomontages of the proposed development are also enclosed and have been prepared by Modelworks.

- *The LAP illustrates a Gateway building to the north-east corner of the site. The proposed 5-7 storey building (Block D) is appropriate in this regard. However, it should be of high architectural merit.*

#### **Applicants Response**

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. There is passive surveillance provided from Block D towards the canal and pedestrian/cycle route along the northern edge of the site.

The Architectural Design Statement prepared by O'Mahony Pike Architects explains that,

*"Block D had been designed so as to provide an appropriate gateway building, in accordance with the LAP. The building comprises two parts, with the main part being 7 storeys and the secondary part being 5 storeys, so as to provide an appropriate transition in scale from the nearby 3 storey houses. The main form has a brick finish, and it is intended that a rich, red/brown brick, similar to the one that has been used at the entrance to Luttrellstown Gate, would be used here, as this would distinguish Block D from the surrounding buildings, which are generally buff brick. Block D has a strong rhythm of windows on its facades, and the upper floor windows have a distinctive header panel of aluminium, and the corner balconies have a feature metal frame. Please refer to the CGIs and O'Mahony Pike drawings for further detail."*

- *In line with the recommendation of the Conservation Officer, the applicant is required to submit an assessment of the visual impact of Block D on the protected structures in the vicinity (i.e. Royal Canal, Former Clonsilla Schoolhouse and Kennan Bridge).*

### **Applicants Response**

Please refer to enclosed Landscape and Visual Impact Environmental Impact Assessment Chapter prepared by Doyle & O'Troithigh Landscape Architects in accordance with *Objective DMSO162 of the Fingal Development Plan 2023-2029*.

As requested by the Conservation Officer, the LVIA provides an assessment of the visual impact of Block D on the protected structures in the vicinity (i.e. Royal Canal, Former Clonsilla Schoolhouse and Kennan Bridge), where it is ultimately concluded that the proposal will not impact on the protected structures in the vicinity of the site.

- *The Planning Authority has concerns regarding the design of Duplex units "D1A & D1B". There are excessive door and window variations in terms of size and style along the front elevations across different levels. The door and window arrangement should be appropriately balanced.*

### **Applicants Response**

In the first instance, we refer to the Architectural Design Statement prepared by O'Mahony Pike Architects which confirms,

*"We note the Planning Authorities comments regarding the design of Duplex units D1A & D1B. However, the D1A and D1B duplex type has been designed to address the specific characteristics of their site, i.e. all first and second floor habitable rooms are orientated to face the street, and not to face the communal area to their rear, in order to avoid any overlooking of St. Brigids Court Traveller Accommodation. This arrangement necessitates that the three bedroom windows and the living room window for the duplex are located on the front elevation.*

*We have changed the size and alignment of some of the windows, and in our opinion the composition of windows, balconies and stairs has an attractive rhythm that will create a bright, well lit unit for future residents, and a well supervised streetscape."*

We refer to the enclosed Architectural Drawing pack prepared by O'Mahony Pike Architects for further detail.

- *"Block G1" in the south-west corner of the site consists of a row of terrace units which front onto an internal local road (north/south). There should be greater design and height variance between these Duplex units. A Monotonous row of terrace units should be avoided in the interest of urban design.*

### **Applicants Response**

We refer to the Architectural Design Statement prepared by O'Mahony Pike Architects which confirms,

*"We note the Planning Authorities concerns regarding Block G1, which is c. 83m in length. However, Block G1 should be considered as part of its wider streetscape, which is part of the route of the loop road through the Eastern Development Area. The duplex buildings and the terrace of houses (no.'s 68-74) that complete the urban block around St. Brigids Lawn Traveller Accommodation are a consistent 3 storeys in height, which we consider to be appropriate, given their position on the loop road that is the primary movement spine for this part of Kellystown, and the more urban character of this part of Kellystown. The subject scheme utilises 3 building typologies - The D1A/D1B duplexes, the D2A/D2B duplexes and the H4C houses to make this urban block, thereby providing variety.*

*It is our opinion that Block G1 should be considered as part of its wider streetscape, both in terms of its height and form. The consistent 3 storey height of the buildings on the western side of the loop road is in contrast with the varied heights on its eastern side, where there are 2 storey houses, and Block F, which is 4 and 5 storeys. In addition, the streetscape here is arranged so that there are views towards the public open space, creating a sense of openness.*

*Block G1 is a well-articulated and animated terrace with a rhythm therein provided by entrances and grouped balconies to breakdown the scale of this terrace. It is located within a street that has good architectural variety in terms of scale and built form set within a street that has good quality natural landscaping. It has also been designed having regard to its western context and we submit that it will sit comfortably within its overall, considered streetscape context”.*

We refer to the enclosed Architectural Drawing pack prepared by O’Mahony Pike Architects for further detail.

- *There should be design variance serving end-of-terrace units denoting their end- of-terrace/corner position, as appropriate.*

### **Applicants Response**

We refer to the Architectural Design Statement prepared by O’Mahony Pike Architects which confirms,

*“The subject scheme proposes specific end-of-terrace units for all house and duplex types that address a public streetscape. In general, the windows that are positioned on these end-of-terrace elevations are large windows which will provide good passive supervision of the streetscape, and a good quality of daylight into the dwelling.*

*All residential blocks, including the apartments, duplexes and houses, have been designed to be 4-sided so that there is good animation along all internal residential streets and external frontages within the scheme”*

We refer to the enclosed Architectural Drawing pack prepared by O’Mahony Pike Architects for further detail.

- *The apartment blocks and dwellinghouse designs (including materiality) should have cognisance of the surrounding developments including the residential development permitted under SHDW/004/21(ABP (ABP 312318) and amended under LRD0034/S3 to the south and west. An appropriate mixture of materiality should be considered.*

### **Applicants Response**

We refer to the Architectural Design Statement prepared by O’Mahony Pike Architects which confirms,

*“The subject scheme has been considered in the context of the permitted scheme to its south and west, Planning Ref. ABP-312318-21, as amended by LRD0034/S3.*

*The architectural treatment of the proposed buildings is strongly related to that of the permitted neighbouring scheme. The apartment buildings have very similar massing, finishes and balcony & window types. The houses have similar, pitched roof forms, and a similar palette of generous contemporary window types.*

*The diagram on this page (page 73 of the Design Statement) shows the relationship of material allocation between the permitted and proposed schemes. As with the permitted scheme, buff brick is the predominant material on the public streetscapes, with render used on secondary elevations. A darker, reddish/brown brick is proposed on Block D - this will be a similar brick to the one which has been used at the entrance to the adjoining scheme, and reflects the importance of both the locations of Block D and the entrance houses off the Kellystown Loop Road.”*

We refer to the enclosed Architectural Drawing pack prepared by O’Mahony Pike Architects for further detail.

- *The applicant should extend the red line boundary into Riverwood Square at the north-east corner of the site.*

### **Applicants Response**

As per the above request, the red line boundary has been extended into Riverwood Square at the north-east corner of the site as illustrated within the Architectural Drawing pack prepared by O'Mahony Pike Architects.

### 3.2 Housing Department and Part V Fulfilment

- *The developer has advised that the 20% Part V rate is applicable to this development, as such the Housing Department will consider this site for the delivery of Part V affordable units in addition to Part V social housing.*
- *The developer has indicated that the Part V units would be located in Blocks F, G1, G2, G3 & G4, these appear to be either apartment or duplex units. Given the mix of the unit types proposed for this development which includes 97 no. houses, the Housing Department request a revised mix of unit types is proposed for Part V which would include some houses. These will better reflect the mix of units in the overall development and the housing need for this area.*
- *A Part V validation letter will be required as part of the Stage 3 planning application. As such the Housing Department request that a full Part V proposal is submitted to PartV@fingal.ie for review and consideration which includes some houses and takes the below additional requirements into consideration: Fingal Development Plan 2023-2029 - Objective SPQHO22 – Accessible Housing: 30% of social housing (Part V) should be fully accessible and designed with a universal design approach to ensure the property will be flexible and can be changed as needed over the course of the occupants' lifetimes. This includes lift access to units where the entrances are not on ground floor, level access to balconies, terraces and communal areas, accessible bathrooms with level access showers (or designed to allow for easy conversion) and grounds for grabrails, a soft spot between the bedroom and bathroom for a future door and possible hoist installation, adequate circulation space, storage etc. in accordance with the current best practice guidance. Where these units are proposed as two-storey houses, it should include a bedroom and accessible bathroom on ground floor level. Fingal Development Plan 2023-2029 - Objective DMSO37 - Age Friendly Housing: new residential developments of more than 100 units should provide 10% of the units as age-friendly accommodation. Refer to the FCC publication: "10 ways to create Adaptable and Age Friendly Home." (March 2019) and other relevant and current best practice guidance.*
- *The Part V proposal should also include the below information: A brief outline of how the Part V obligation will be satisfied; Site location map; Site layout plan which identifies the location of the proposed Part V units (including which units meet the Accessible Housing and Age Friendly Housing requirements); All relevant drawings and floor plans; A schedule of accommodation detailing all units in the proposed development with the Part V units identified; Indicative unit costs*

#### **Applicants Response**

The applicant acknowledges the Housing Department's request regarding the Part V unit mix and confirms that this has been taken on board. A revised proposal has been prepared to include a more representative mix of unit types, including houses, to better reflect the overall development and local housing need. Please refer to the updated O'Mahony Pike drawings and Design Statement for further details.

Discussions are ongoing and fluid between the Applicant and Housing Department including the potential inclusion of houses as part of the Part V mix, which must ultimately be formally agreed with the Housing Department before development can commence on-site, subject to planning.

We refer to the enclosed Part V Validation Letter issued by Fingal County Council.



### 3.3 Parks and Green Infrastructure

- The Public Open Space and Play Provision requirements for this development are as follows:

	Units Total	Bedspaces Total	
3+ Bedroom Units	116	406	
1- and 2-Bedroom Units	186	279	
Unit Total	302		
Bedspace Total		685	
The Overall Public Open Space requirement for this application is		17125.00	sq.m
Net site area is	4.0800	hectares	
15% of site area is required on site to be Public Open Space	0.6120	hectares	
<b>Contribution Calculations</b>			
Open space requirement (hectares)	1.7125		
Provided on site (hectares)	0.8231	Class 1	Class 2
Remainder to be levied for contribution (hectares)	0.8894	0.6671	0.2224
Playground requirement (4 s.q. metres per unit)	1208	Square Metres	

- Open Space requirement of c. 8894sqm for the subject application.
- For the permitted development (ABP-312318-21, as amended by LRD0034/S3, the Public Open Space requirement was 20,375sqm), with c.27,869sqm of open space permitted (an excess of c. 7,494sqm).
- As outlined in the Schedule of Accommodation prepared by O'Mahony Pike Architects, c. 4,335sqm of this excess will be assigned to the subject scheme, resulting in a Public Open Space shortfall of c. 4,559sqm.
- Within the scheme, c. 8,231 sa (18.8%) of Class 2 Public Open Space is provided in the gross site area, with c. 6,455sqm (14.8%) provided in the net site area. The public open space strategy for the proposed scheme aligns with the principles of the Kellystown LAP, with a large public open space being provided along the eastern side of the residential site. We note that this area of public open space has increased in size and width since the S247 consultation. This is acceptable in principle.

#### Applicants Response

In terms of public open space requirements, we note that Objective CIO5038 states,

*"Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms."*

The proposed development of 302no. dwellings comprises:

- 35no. 4 bed houses (35 x 3.5 persons = 122.5)
- 62no. 3bed houses (62 x 3.5 persons = 217)
- 19no. 3bed duplex units (19 x 3.5 persons = 66.5)
- 7no. 2 bed duplex units (7 x 1.5 persons = 10.5)
- 81no. 2bed apartments (81 x 1.5 persons = 121.5)
- 98no. 1bed apartments (98 x 1.5 persons = 147)

The expected occupancy above results in a population equivalent of **685 people**. This would give a pro-rata public open space area requirement of min. **17,125sqm sqm**.

The quantum of Public Open Space proposed amounts to:

- **Class 2 POS = 0.8231ha (8,231 m2 )**
- **Class 1 POS = 0.4075ha (4,075m2 )**

In terms of Class 1 public open space, the public park permitted as part of the Kellystown SHD scheme (ABP-312318-21, as amended by LRD0034-S3) amounts to c. 27,869sqm. This is in excess of the requirements for the consented SHD dwellings, by c. 7,494sqm. As c. 3,419sqm of this has been allocated to the concurrent Luttrellstown Gate Phase 2 scheme (99no. dwellings), the remaining c. 4,075sqm is allocated to the subject scheme in terms of Class 1 open space provision.

8,231sqm of Class 2 Open Space is provided within the gross site area, resulting in a public open space shortfall of c.4,819sqm.

We would highlight, that in addition to the Class 1 and Class 2 public open space areas identified above, there is also a significant quantity of 'Environmental Open Space' proposed within the scheme, which will be of benefit to the new residential neighbourhood. We consider that these spaces further enhance the visual and natural amenity in this area.

The Kellystown LAP is clear in that Class 1 POS is provided to the south of the Kellystown Link Road. The Applicant has facilitated delivery of the schools, burial grounds, new sportsground for St. Mochtas and c. 2.8 Ha of Class 1 public parkland (under Luttrellstown Gate Phase 1) on the full extent of lands under their ownership to the south of the Kellystown Link Road. There is a considerable swathe of additional Public Open Space to be delivered further west including an 8 Ha public park, urban farm, off-leash dog park and additional green and blue corridors. The Applicant is in continuing and active negotiations with the adjoining third party landowner with a view to acquiring both the Central Development Area lands to the north of the Kellystown Link Road and a substantial swathe of Open Space zoned lands to the south of the Kellystown Link Road and we would respectfully submit that additional public open space lands will be forthcoming as will the ultimate realisation of the full development vision for the Kellystown LAP lands.

- *Existing trees, hedgerows, and field boundaries have been protected and retained as far as is practicable in the development proposal. Clarity is required in relation to hedgerow retention and removal. It is noted that hedgerows 10 & 19 are not mentioned for retention in the Local Area Plan, however the applicant needs to show that there is no net canopy loss because of this development.*

### **Applicants Response**

Doyle & O'Troithigh working with the Project Team and informed by the Project Arborist detailed the trees and hedgerows to be retained as part of the project works. Along with the tree and hedgerow protection plan prepared by the Project Arborist the retained vegetation is illustrated on the landscape plans.

Through the retention of the western boundary hedgerow and the extensive planting across the site lands including the street scape and eastern linear park, post construction the vegetation canopy on site will be greater than that currently present. The species contained in hedgerows 10 and 19 will also inform the selection of species being proposed as part of the detailed design development and compliance with planning of the site wide landscape scheme.

We refer the Planning Authority to the enclosed Landscape Pack prepared by Doyle & O'Troithigh Landscape Architecture and the Arborist Pack prepared by The Tree File Consulting Arborists for detail on existing trees, hedgerows and field boundaries as well as proposed planting.



- *As no site walkover has yet been conducted for this particular phase, a comprehensive and conclusive assessment of the habitats and likely species on Site cannot be accurately summarised at this point. The applicant should clearly state when this will be undertaken.*

#### **Applicants Response**

As part of the detailed design phase and compliance with planning stage of the site development works, Doyle + O'Troithigh with the Project Arborist and Ecologist will undertake a site walkover and site survey to survey all the flora and fauna on site. This will be undertaken with reference to the Foulkes et al County Hedgerow Survey. The information gathered under this survey will inform the detailed design of the landscape scheme in particular species mix and location.

- *Boundary treatment to the rear of houses 68 - 74. This layout is not ideal and needs to be reconsidered.*

#### **Applicants Response**

Doyle + O'Troithigh, the appointed landscape architects, in coordination with project architects, O'Mahony Pike Architects, have revised the boundary location and type to the rear of houses 68-74.

The revised layout has provided greater separation between the units and the adjoining traveller accommodation. The addition of buffer planting, access pathways and an amenity area to the rear of these units allows for the development of a considered landscape boundary which will provide a green buffer to the adjoining traveller accommodation. The space itself is a private, self-contained communal open space area accessible only to the residents of duplex and simplex units adjoining to the east and west. A 2m high rear wall is envisaged to the rear of the private gardens for house no's 68-74. Hedge and tree planting at the northern edge of the communal open space area will further protect the residential amenity of these houses.

We refer the Planning Authority to the enclosed Landscape Pack prepared by Doyle & O'Troithigh Landscape Architecture and the Architecture Pack prepared by O'Mahony Pike Architects for detail on the proposed boundary treatment to the rear of houses 68-74.

- *There are opportunities for more street trees within the development.*

#### **Applicants Response**

As part of the planning design development, Doyle + O'Troithigh in consultation with the M+E Consultants, have proposed a street planting regime in coordination with the lighting layout along with reference to the Forest of Fingal Guidelines. Previously as part of preplanning the proposals for street tree planting had been limited as the coordination exercise had not been fully completed. This coordinated approach has ensured that each street is tree lined in a considered manner which will allow for the street trees to establish and mature without impact on the surrounding development. As part of the post planning detailed design the selection of tree species will be informed by the site walkover survey. The trees will be columnar in type reducing potential impact with vehicles, pedestrians and cyclists.

See landscape plan LP-01 prepared by Doyle & O'Troithigh Landscape Architecture for the proposed location of the coordinated street trees and lighting columns. In all cases the trees are located to the side and or rear of the object being illuminated by the light column

### 3.4 Transport and Access

We refer the Planning Authority to the enclosed Engineering Response to LRD Opinion Report prepared by Waterman Moylan Consulting Engineers.

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

#### Applicant Response

We refer to Sections 4.4 & 4.5 of the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Consulting Engineers which addresses the transport objectives of the LAP.

Waterman Moylan Consulting Engineers confirm that the proposed road layout and pedestrian and cyclist facilities have been developed in accordance with the LAP.

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

#### Applicants Response

The above comment is noted.

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

#### Applicants Response

We accept the Planning Authority's positive assessment of connectivity and permeability with the scheme.

As per the above request, the red line boundary has been extended into Riverwood Square at the north-east corner of the site, connecting to existing footpath into Riverwood. We refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100 for further detail.

- *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.*

#### Applicants 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 is attached to this planning application.

- *The development would be constructed and maintain to the Councils 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.*

#### Applicants Response

We accept the Council's requirements. The development will be constructed and maintained to the Council's standards for taking in charge, including all roads, footpaths, verges, public lighting, open space, sewers, watermains, and drains until formally taken in charge.

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

#### **Applicants Response**

The requirements are noted.

- *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)".*

#### **Applicants Response**

We acknowledge and accept the Council's Taking in Charge Policy as outlined in Appendix 6, Section 8, and confirm that all roads proposed to be taken in charge will comply with the definition set out in the 1993 Roads Act.

- *The consequence of the above point, is that the Councils 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.*

#### **Applicants Response**

Noted. Waterman Moylan confirm that "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."

- *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 this is for the Pedestrian/Cycle over bridge- Irish rail engagement.*

#### **Applicants Response**

Metro West has been excluded from the National Transport Authority's Greater Dublin Area Transport Strategy since 2016.

The Greater Dublin Area Transport Strategy 2022 – 2042 by the National Transport Authority provides an outline of potential public transport projects up to 2042. It provides for DART+West expansion, but no other rail or light rail proposal serving the Blanchardstown area before 2042. The Strategy does not contain proposals for a future station (neither light rail nor heavy rail) at Porterstown or a light rail line along Diswellstown Road.

However, the Local Area Plan further identifies that "There is a possibility that a portion of the land at the extreme north-eastern part of the site (next to Diswellstown Road) may be the location of a future train station and/or future Metro West transport node. As such, the land use in this area must be of a

temporary nature, of a material which do not require strong foundations and which can be removed without causing any impact on the surrounding developed land.”

While there appears to be no support at strategic level for the development of a train station or node at Porterstown, or any plans to extend a rail service over and above DART+ West to the Dublin 15 lands before 2042, the proposed development is consistent with the provision of the Kellystown LAP object DA 1.8.

In this respect, within the application site the north eastern corner comprises public open space lands. This does not require foundations and is reversible should the need arise to facilitate a transport node in the future. The proposed open space use is consistent with the ‘RA’ land use zoning of the County Development Plan and with the Kellystown LAP indicative layout plan (Fig 6.3) for the Eastern Development Area.

We refer to the enclosed architectural and landscape plans which show the proposed public open space situated in this location. In the event that the potential for a new rail/light rail station at Porterstown became a real prospect, the proposed layout and finish of the space can be amended to form a more formal threshold space adjacent to the rail station. Please refer to the Landscape Design Report prepared by Doyle O’Troithigh Landscape Architecture for further detail in this regard.

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

#### **Applicants Response**

We accept the Council’s comments regarding internal layout. Footpath continuity, crossing points, and transitions to permitted developments have been addressed. We refer to the enclosed architectural, engineering and landscaping packs.

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

#### **Applicants Response**

Waterman Moylan Consulting Engineers note the above and state,

*“Please refer to Waterman Moylan Consulting Engineers 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.”*

- *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.*

#### **Applicants Response**

Noted. Please refer to O’Mahony Pike drawing no. 156E-OMP-00-SP-DR-A9003 Taking in Charge Layout, to Waterman Moylan Consulting Engineers drawing no. STM-WMC-ZZ-00-DR-C-100 Road Layout and Levels, & to Doyle & O’Troithigh LP-01-PP Landscape Plan, LS-01-PP Landscape Section, LP-01-IN Landscape Plan, which are attached to this planning application

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

### **Applicants Response**

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.

As per the above request, the red line boundary has been extended into Riverwood Square at the north-east corner of the site, connecting to existing footpath into Riverwood. We refer to Waterman Moylan drawing no. STM-WMC-ZZ-00-DR-C-100 for further detail.

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

### **Applicants Response**

In the first instance, we refer the Planning Authority to the enclosed Traffic and Transport which provides a justification for the proposed car parking rational.

A total number of 241 no. Car parking spaces are proposed.

We refer the Planning Authority to the Schedule of Accommodation and Architectural Design Statement, prepared by O'Mahony Pike Architects, and to the Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers, for further information on car parking rationale.

As the nearest bus stop is approximately c. 450m (5 minute walk) which is served by routes 37 & 70n. The former has a frequency of 5-10 minutes and therefore, the site is considered to be an 'Accessible Location'. As per SPPR 3, car parking at such locations should be substantially reduced. The maximum rate of car parking provision for residential development shall be 1.5 no. spaces per dwelling. The proposed development proposes at total of 241no. spaces, equating to 0.8 spaces per dwellings, well below the maximum quantum.

The development supports sustainable forms of transport through high quality cycle facilities and public realm. The site is in walking distance to Blanchardstown Centre, offering numerous facilities and services. There are a number of public bus services in proximity to the site as well as train station within 1.1km.

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

### **Applicants 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 are attached to this planning application.

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

#### **Applicants Response**

Noted. Refer to Waterman Moylan Consulting Engineers drawing no. STM-WMC-ZZ-00-DR-C-100 Road Layout and Levels, and to O'Mahony Pike drawing Nos. 156E-OMP-00-SP-DR-A9003 Taking in Charge Layout & 1506E-OMP-00-SP-DR-A-1500 Car Parking Layout, which are attached to this planning application.

### **3.5 Water Services**

- *The site is wholly in Flood Zone C and therefore appropriate for development.*
- *The surface water drainage strategy, design and details are acceptable.*
- *Water Services have no comments or questions.*

#### **Applicants Response**

The above is acknowledged and accepted.

We refer to the enclosed engineering documentation prepared by Waterman Moylan Consulting Engineers for detail on the proposed water service arrangements.

### **3.6 Conservation**

- *Conservation requires similar to Planning, an assessment of the visual impact of Block D on the protected structures in the vicinity (i.e. Royal Canal, Former Clonsilla Schoolhouse and Kennan Bridge).*

#### **Applicants Response**

Please refer to enclosed Landscape and Visual Impact Environmental Impact Assessment Chapter prepared by Doyle & O'Troithigh Landscape Architects in accordance with *Objective DMSO162 of the Fingal Development Plan 2023-2029*.

As requested by the Conservation Officer, the LVIA provides an assessment of the visual impact of Block D on the protected structures in the vicinity (i.e. Royal Canal, Former Clonsilla Schoolhouse and Kennan Bridge), where it is ultimately concluded that the proposal will not impact on the protected structures in the vicinity of the site.

- *Visualisations should include views from Kennan Bridge and also from Dr. Troy Bridge looking down at the proposal.*

#### **Applicant Response**

We refer to the enclosed Photomontages prepared by Modelworks which include views from Kennan Bridge as well as Dr Troy Bride overlooking the proposed scheme.

- *It is requested that a planted buffer to the northern boundary with the rail line be strengthened, particularly in the NE and NW corners. The tow path to the canal sits lower than the ground level of the site but there are gaps in the vegetation cover especially around the supports for the Dr. Troy Bridge (NE corner) so proposal should provide a deeper planted buffer area along the north boundary from what is outlined.*

**Applicants Response**

At the time of pre-planning for the subject application, planting proposals to the northern boundary had not been finalised. Arising from Planning Authority feedback, the northern boundary has been revised allowing for the development of a green buffer of tree, hedge and herb layer planting.

The proposed planting will knit with the planting to the rail line enhancing the existing buffer planting between the site lands, rail line and the Royal Canal. The species contained in hedgerows 10 and 19 will inform the selection of species being proposed as the buffer planting to the northern boundary.

We refer the Planning Authority to the enclosed Landscape Pack prepared by Doyle & O'Troithigh Landscape Architecture and the Architecture Pack prepared by O'Mahony Pike Architects for detail on the proposed northern boundary.

- In the NW corner there is a reservation area for Dart+ West pedestrian bridge. Whilst the Dart project is subject to Judicial Review it would be worth including visualisations that show views both with and without the proposed ramps for the Dart+West pedestrian bridge and set out how the landscaping/planting around this will look.

**Applicants Response**

Please refer to enclosed Landscape and Visual Impact Environmental Impact Assessment Chapter prepared by Doyle & O'Troithigh Landscape Architects in accordance with Objective DMSO162 of the Fingal Development Plan 2023-2029 and Photomontages prepared by Modelworks which include views for the Dart+West pedestrian bridge.

Stephen Little & Associates are committed  
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development goals.

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