

**Statement of Response
to An Bord Pleanála
Opinion**

**Proposed SHD Planning
Application**

**Blackglen Road
Sandyford
Dublin 18**

**On behalf of
Zolbury Ltd.**

August 2022



Planning & Development Consultants

63 York Road,

Dun Laoghaire

Co. Dublin

www.brockmcclure.ie

Table of Contents

1	INTRODUCTION.....	3
2	REQUIREMENT FOR THIS STATEMENT	4
3	RESPONSE TO ISSUES RAISED.....	7
	3.1 ARCHITECTURAL DESIGN APPROACH.....	7
	3.2 CONNECTIVITY.....	16
4	RESPONSE TO SPECIFIC INFORMATION REQUESTED.....	26
5	RESPONSE TO DUN LAOGHAIRE RATHDOWN OPINION	35
6	CONCLUSION	37



1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, have prepared this Statement of Response on behalf of **Zolbury Ltd. Unit 9, Ardcavan Business Park, Ardcavan, Wexford, Ireland Y35 XT53.**

This Statement of Response is submitted with the application documentation in respect of the proposed Blackglen Strategic Housing Development [SHD], for a new residential scheme comprising 360 no. residential units, associated resident amenity facilities and a childcare facility in the form of 9 no. new apartment buildings.

This response has been prepared with direct input from:

- O'Mahony Pike Architects (*Design Architects*)
- KSN Project Management (*Project Managers*)
- Brock McClure Consultants (*Town Planning Consultants*)
- O'Connor Sutton Cronin Consulting Engineers (*Design Engineers*)
- Gannon & Associates Landscape Architects (*Landscape Architects*)
- Enviroguide (*Arborist & Ecologists*)
- IAC Archaeology / Archaeology Heritage (*Archaeology*)
- Rob Goodbody (*Architectural Heritage*)
- O'Connor Sutton Cronin Consulting Engineers (*Electrical Engineers*)
- O'Connor Sutton Cronin Consulting Engineers (*Traffic & Transport Consultants*)
- O'Connor Sutton Cronin Consulting Engineers (*Daylight and Sunlight*)
- Modelworks (*Verified Views and LVIA*)
- Enfonc Ltd (*Noise Impact*)
- ISM Ireland (*Telecommunications*)
- O'Hurlihy Access Consultancy (OHAC) (*Universal Access*)
- Transport Insights (*Traffic & Transport*)

2 Requirement for this Statement

This report is a response to the issues raised by An Bord Pleanála following the pre-application consultation in respect of the proposed SHD (ABP Pre-Application Reference ABP-311917-21 refers).

In May 2022, An Bord Pleanála issued a Notice of Pre-Application Consultation Opinion on Blackglen Pre-Application Request which stated the following:

*“Following consideration of the issues raised during consultation process and having regard to the opinion of the planning authority, **An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.**”*

The opinion sets out that the following issues need to be addressed in the documents submitted with any application for permission in respect of the proposed development. These matters can be summarised as follows:

1. Architectural Design Approach
2. Connectivity

The opinion of An Bord Pleanála in relation to these matters and the response from the applicant are identified in Section 4 of this document for convenience purposes.

Furthermore, An Bord Pleanála requested the submission of the following specific information with any planning application for permission:

An updated Architectural Design Statement

1. A Traffic and Transportation Impact Assessment (including justification of two access points proposed off Blackglen Road).
2. A Road Safety Quality Audit, as applicable should be submitted in support of the proposed access and traffic arrangements.
3. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the Development Plan other than in relation to the zoning of the land, indicating why permission should, nonetheless be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.
4. In accordance with section 5(5)(b) of the Act 2016, as amended, any application made on foot of this application should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objective of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.
5. Additional details and/or revised proposals in relation to site services, having regard to the report of the Drainage Planning Section of the Planning Authority. Additional detail and/or revised proposals in relation to the SuDS, attenuation measures and drainage calculations; Further consideration is also required with Irish Water to confirm the feasibility of connection to the network.
6. A Housing Quality Assessment
7. A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically with regard to potential overlooking, overshadowing, and overbearing.
8. Details of a Green Infrastructure Plan, Landscaping Plan, Arboricultural Drawings, and Engineering Plan that take account of one another.



9. Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. Proposals for play equipment, street furniture including public lighting and boundary treatments should be submitted. Justification of quantum and quality of open space provision, both communal and public open space. Clarity with regard to change in levels, compliance with Development Plan standards and planting details.
10. A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban Housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments, Particular regard should be had to the requirement to provide a high quality and sustainable finishes and details which seek to create a distinctive character for the development.
11. A social Infrastructure Capacity Assessment (including school capacity assessment)
12. Additional CGIs are required, as well as a Landscape and Visual Impact assessment with photomontages, to include consideration of winter views from the surrounding areas.
13. A full response to matters raised within the PA Opinion and Appended Dun Laoghaire Rathdown County Council Department comments submitted to ABP on 10.11.12.
14. Where an EIAR is not being submitted, the applicant should submit all necessary information referred to in article 299B (1)(b)(ii)(II) and article 299B (1)(c) of the Planning and development Regulations 2001-2018 for the purpose of EIAR Screening.
15. An up-to-date Ecological Impact Assessment, inclusive of Bird and Bat Survey
16. A site layout plan indicating what areas, if any, are to be taken in charge by the Planning Authority.
17. Site Specific Construction and Demolition Waste Management Plan (including consultation with the project engineer for the Blackglen Road Improvement Scheme and with DRDCC traffic department)

Section 5 of this report sets out the applicant's and design team's response to the above requested items.

In addition, the opinion sets out that the applicant shall notify the following authorities in the event of the making of an application for permission:

1. Irish Water
2. National Transport Authority
3. Transport Infrastructure Ireland
4. Minister for Culture, Heritage and the Gaeltacht (Built Heritage and Nature conservation)
5. Heritage Council
6. An Taisce
7. Waterways Ireland
8. DLR Childcare Committee

It is confirmed that a full digital copy of the planning application currently under consideration has been furnished to the authorities referenced. We confirm that the digital copy was the preferred format for prescribed bodies of the formal strategic housing development planning application. Where required by the prescribed body a USB of the digital material has also been issued.

In addition to the above, we note that the application form in respect of Strategic Housing Development references the following information:

12 (e) Where An Bord Pleanála notified the applicant of its opinion that the documents enclosed with the request for pre-application consultations required further consideration and amendment in order to constitute a reasonable basis for an application for permission, a statement setting out any changes made to the proposals in consequence.

A statement setting out the key changes made to the proposal as a consequence of the opinion requesting further consideration of the Architectural Design Approach and Connectivity for the scheme has been incorporated into Section 3 of this report.

12 (f) Where An Bord Pleanála notified the applicant that specified additional information should be submitted with any application for permission, a statement setting out that such information accompanies the application.

As set out above, Section 4 of this report sets out the applicant's and design team's response to the above requested items

3 Response to Issues Raised

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development:

The opinion of An Bord Pleanála in relation to these matters and the response from the applicant are identified below.

3.1 Architectural Design Approach

Further justification for increased heights and higher densities at this location, based on the applicable Dun Laoghaire-Rathdown County Development Plan, the perspective applicant should fully address the issue raised by the PA in their opinion, explicitly addressing issues regarding the transitional zone, noting the surrounding established urban context and the potential visual impact, in particular noting the high amenity lands and the foothills of the Dublin Mountains to the southwest.

Response:

To further justify the proposed height and density at this location, OMP have justified the architectural design approach with three main points:

1. Zoning
2. Density
3. Height

Zoning

The subject site is zoned ‘A’ – “To protect and/or improve residential amenity.’ It is located in a ‘Transitional Zone’ between the built up urban areas and the high amenity lands at the foothills of the Dublin Mountains. The scheme demonstrates a high quality architectural approach that responds fully to the site context.



Figure 1 – Zoning Map with site outlined in Red (Source DLRC Development Plan 2022-2028)

The cross section below along Woodside Road, accompanied by the verified view 09, illustrates the reduction in building height in response to DL RCC comments and successful reduced visual impact with high development setback distances and landscape visual screening to the edge. This design response is considered an appropriate reduction in scale adjoining the transitional area along Woodside Road having regard to the zoning objective 'G' and 'B'.



Figure 2 - Location of Cross Section



Figure 3 - Proposed Cross Section Block C



Verified View 09 - Tripartite Proposal



Verified View 09 - Current Proposal

Figure 4 - Current Proposal shows a reduced height on Block C3 by 2 no. stories

1. Density

The site is located on lands with zoning objective ‘A’ for residential development. The ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’, identify a number of locations suitable for apartment development primarily. These are defined as:

- ‘Central and / or Accessible Urban Locations
- Intermediate Urban Locations
- Peripheral and / or Less Accessible Urban Locations.

As such in terms of proximity and accessibility considerations within the 2020 Apartment Guidelines, the site can be described as a ‘Intermediate Urban Location’ .

Intermediate urban locations are defined in the Apartment Guidelines by the following criteria:

- Sites within or close to i.e., within reasonable walking distance (i.e., up to 10 minutes or 800-1000m), of principal town or suburban centre or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e., between 10-15 minutes or 1000-1500m) of high-capacity urban public transport stops or within reasonable walking distance (i.e., between 5-10 minutes or up to 1000m) of high frequency urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) of reasonably frequent urban bus services.

The proposed development is in keeping with this urban typology as described in the 'Guidelines' for the following reasons:

- The Blackglen site is within 1900m of the Luas line, although this is slightly further than the recommended 1500m, the site is a well-connected location with bus services and a walkable distance to the Luas.
- The site is located on a Quality Bus Corridor with a bus stop located on the roadside boundary. The 44B bus route runs from Glencullen to Dundrum Luas Station and the 114 bus route runs from Simon's Ridge to Blackrock Station. Both Dundrum Town & Blackrock Station have numerous bus routes to neighbouring districts as well as Dublin city Centre.
- A DART service is also available at Blackrock Station. Glencairn is the closest Luas stop to the development and is located within 5 minutes' cycle or 20 minutes' walk. A park and ride facility is also available at Glencairn Luas Stop.
- The TFI 90 Minute Fare, which was introduced by TFI, includes the flexibility to transfer between Dublin Bus, Luas and most DART, commuter rail (zones 1 to 4 in the Short Hoop Zone) and Go-Ahead Ireland services in Dublin – just touch on your last journey within 90 minutes of the first.

Having regard to the site's location within the catchment area of the Section 49 LUAS Development Contribution Scheme, the proximate Glencairn and Sandyford Luas stops, and existing bus stops, it is our professional planning opinion that the subject site can be considered an Intermediate Urban Location. The subject development has therefore been designed with increased building height and density in accordance with National level guidance.

Details in respect of compliance with the standards contained in the Sustainable Urban Housing: Design Standards for New Apartments, 2020, are set out in the accompanying Housing Quality Assessment and Schedule of Accommodation by O' Mahony Pike Architects (OMP). In particular, the guidelines contain a number of Specific Planning Policy Requirements (SPPRs) of relevance.

The revised scheme has been adjusted in response to comments received at the Tripartite stage which now represents a reduced scale of development of 360 apartment units (a reduction of 40 units) with a reduced gross density of 97.3 units per hectare. It is our contention that restricted densities of less than 50 units per hectare is inappropriate given the large site holding of circa 3.7ha, the residential zoning objective on the lands and other relevant National Planning Policy. It is noted that National Planning Objective (NPO 13) "seeks to base planning of performance criteria rather than blanket numerical restrictions and standards should be subject to a degree of tolerance".

The Planning Department themselves note that Policy RES3 of the County Development Plan is aligned with NPO.13 in that "it seeks to promote higher densities in order to make efficient use of land resources but must protect residential amenity". The question of what is considered appropriate and acceptable density on this site must be measured in terms of the design response and the integration of the proposed buildings with the site characteristics and surrounding context measured against the relevant performance criteria.

In addition, the apartment block typology is favoured as the appropriate residential model which provides for a more compact arrangement of residential units and pattern of development on the site. This approach generates a limited internal road network compared to other sprawling housing models which result in extensive land use for traffic infrastructure. As a result, a low site coverage is achievable and provides the opportunity to maximise on the extent of open space provided, ensuring



that the landscape infrastructure takes centre stage. As a result, generous areas for landscape and open space are afforded to residents while protecting the open, sylvan character of the site and respecting the character of the adjoining surrounding context.

The resultant scheme provides for 47% of open space with only 23.6% site coverage. It was acknowledged by DLRC that *“It is considered that by providing an apartment development and reducing site coverage that larger tracts of land are available for public/communal open space. This also assists in retaining a natural and sylvan setting to the wider site. The Planning Authority considers this is an appropriate way of developing the site, capable of providing much-needed housing, in line with the site’s zoning objective but also allowing for a landscape strategy that sits well in its context of a transitional area in the urban fringe with rural lands in its vicinity”*

The design approach and development strategy is supported by reference to the following performance criteria which demonstrates the overall quality of the proposed development.

- Overlooking and Privacy
- Building Layout and Separation Distances
- Stepping down of building height and scale transitioning to edges
- Justification for increased height at centre
- Landscape buffer / tree trail treatment to site perimeter
- Daylight and Sunlight assessment
- Shadow cast analysis
- Wind/Microclimate assessment
- Landscape Visual Impact assessment
- Housing quality assessment and Dual Aspect Ratio
- Development Amenities and Facilities





Figure 5 - Main Landscape Plan

Performance Criteria

A feature of this proposed development is the careful integration of apartment buildings within the landscape taking into account the sloping nature and topography of the site, its setting and its immediate surrounding context. Through considered site analysis and optioneering at the outset, the proposed site layout emerged whereby buildings followed the natural slope of the land by stepping up with the contours to integrate with the landscape and rolling hillside. This informed the positioning and orientation of buildings which in the case of the B blocks resulted in clustered forms along the lower hillside with gaps in-between creating courtyards to allow for views and a sense of openness. The access road serving the apartment buildings follows the natural contour lines to avoid abrupt and steep transitions in gradient while also ensuring there is minimal cut and excavated ground works.

The layout and access approach is acknowledged by DLRCC, noting that “the proposed layout and access is considered to be an adequate response to the site’s physical characteristics”.

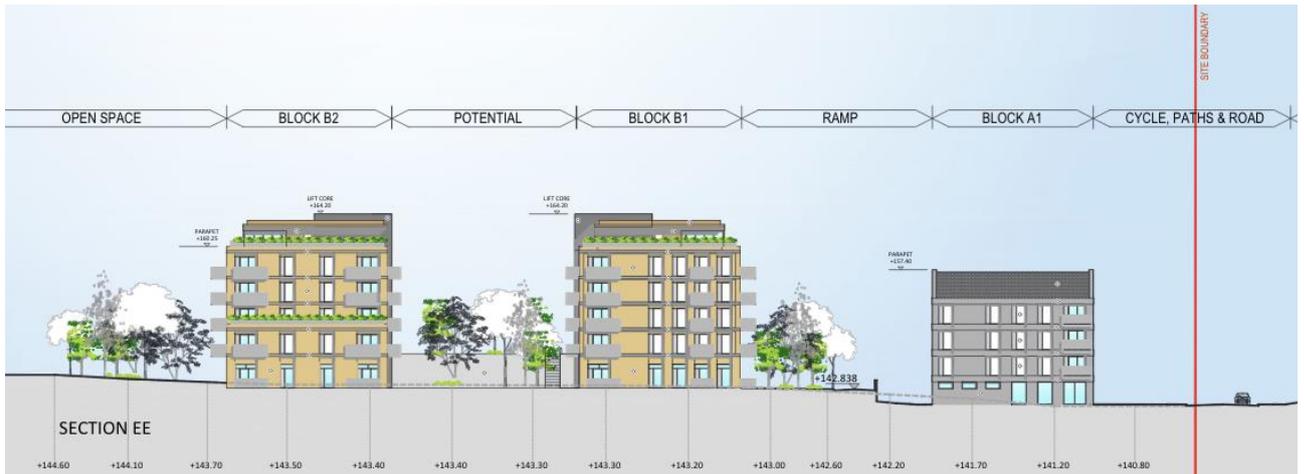


Figure 5 - Cross Section FF

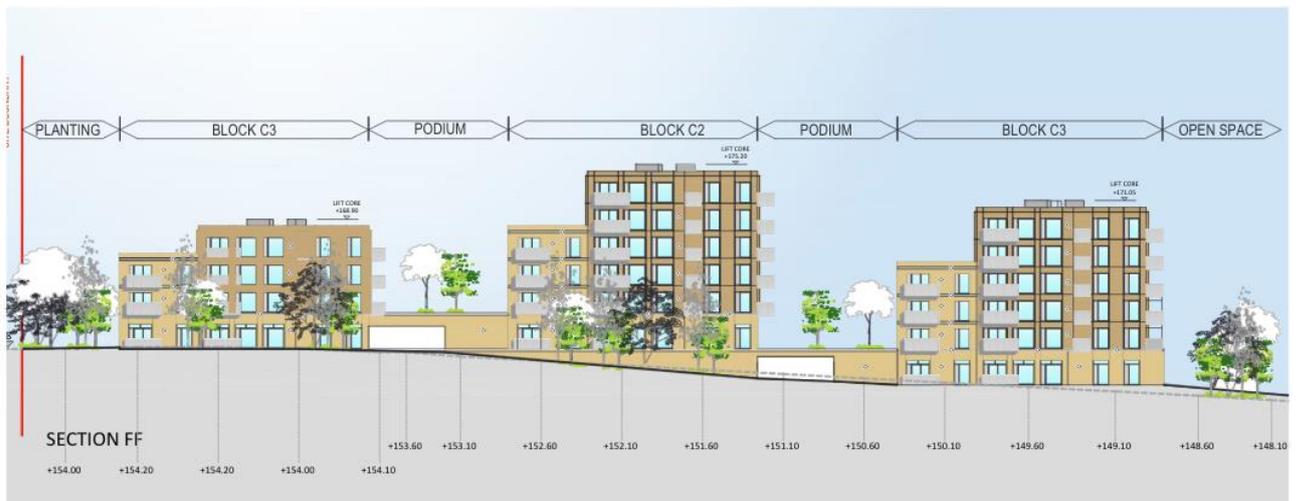


Figure 6 - Cross Section EE



Figure 7 – Cross Sections EE and FF

The scheme demonstrates that a sensitive approach is taken through the integration of buildings with the landscape character. Various performance criteria are used to analyse and test the quality of the scheme in relation to various parameters, all of which demonstrate that the design, building layout, form and heights are well considered and appropriately modulated to ensure that the residential amenity of adjoining properties are protected and are not adversely impacted by this proposed development. Furthermore, there is no resulting negative visual impact from the proposals as referenced in the LVIA report.

The adjusted scheme design takes account of the comments received at the Tripartite stage meeting and the resultant reduction in height, scale and massing to specific sensitive views particularly along Woodside Road to the Southwest and Slate Cabin Lane to the Southeast, illustrate the improvements and the very slight to moderate impact these buildings will have on the surrounding receiving environment.

In the Architectural Design Statement, it is clearly illustrated how the various performance criteria demonstrate an appropriate design response in respect of height and the protection of existing residential amenities. This is achieved by arriving at a density which is not predetermined by blanket numerical restrictions but is the outcome of the design process, response to the site characteristics and the establishment of key design principles which underpin an appropriate design and development strategy for this site and its context. It delivers sustainable densities on residentially zoned lands while providing much needed housing supply.



Figure 8 – Separation Distances

Height

Following comments received at the Tripartite stage meeting, the building heights have been reduced by 2 storeys in certain locations, namely block C3 and blocks B3+B4 in response to the comments received. In addition, the entirety of Block D is removed from the development. This was originally proposed as an 8 storey 'tower house' typology element intended as a visual marker in the landscape and located at the centre of the site between the upper and lower hillside character areas to anchor and signify the main, central green open space. The design team have agreed to remove this element given the feedback in respect of the perceived impact in relation to height and visual prominence.

These key significant modifications now result in a scheme with a reduced baseline height of predominantly 4 storeys. Buildings step down to a lower shoulder height of 2-3 storeys to nestle into the sloping topography and to also respond to the interface along the Northern and Easterly boundaries to create a more appropriate transition in scale adjoining existing residential properties.

Given the large, expansive nature of the site with an area of circa 3.7 Hectares, there is an opportunity for slightly increased height at the centre of the site and a significant distance away from any sensitive boundaries with existing residential development. As such, the site to a certain extent has the potential to set its own context for development with the potential for greater building heights in specific locations. As such, elements of the C and B blocks contain an additional 1-2 floors providing 5-6 storeys buildings in height. The top floors of the B blocks are designed as a setback penthouse level which reduces the visual mass of these buildings which are finished in a rustic brown metal cladding.

Taking account of the proposed modifications incorporated into the scheme in relation to the building heights and massing, we contend that the adjusted proposals and height strategy is appropriate for this site and is in line with national policy.



Responses to tripartite meeting: Scale and Massing

1. Reduced overall density and massing from tripartite presentation with the removal of block D
2. Reduced the height of block B3 by 1 storey
3. Reduced the height of block B4 by 2 storeys
4. Reduced the height of block C3 by 2 storeys

Key

 Removed element

 Rotated Blocks



Current Proposal

In addition to reducing the overall height and density, the current proposal has rotated and moved block B2 + B3 to increase the internal separation distances between these blocks.

3.2 Connectivity

Further justification for increased heights and higher densities at this location, based on connectivity, capacity, and frequency of public transport and specifically consideration and compliance with Section 3.2 of the Urban Development and Building Height Guidelines 2018. SPPR3 of the Urban Development sets out, inter alia, that in the event of making a planning application, the applicant shall demonstrate that at the scale of the relevant city / town that the site is well served by public transport with high capacity, frequent service, and good links to other modes of public transport. The applicant is requested to have regard to this policy, as well as other relevant policies at a local and national level, as may be applicable to the proposed development.

Response:

Urban Development And Building Height Guidelines (2018)

Section 1.14 of the Building Height Guidelines states that the statutory position of conflicting Development Plans, as follows:

“Accordingly, where SPPR’s are stated in this document, they take precedence over any conflicting policies and objectives of development plans, local area plans, and strategic development zone planning schemes. Where such conflicts arise, such plans / schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”

We contend that the proposed development satisfies SPPR3 (A) of The Urban Development and Building Height Guidelines for Planning Authorities 2018, and in respect of section 3.2 of the guidelines, we note the following justification in respect of the relevant criteria as listed below:

At the scale of the relevant city/town

Connectivity

“The site is well served by Public Transport with high capacity, frequent service and good links to other modes of public transport”.

The site is served by public transport with high capacity, frequent service and good links to other modes of public transport. The Glencairn Luas stop (with park and ride) on the Green line is 1.9km from the proposed site, a 27-minute walk or 9 minute cycle from the site entrance. The LUAS provides frequent high capacity services to and from the City Centre. There are bus stops on Blackglen Road and Lamb’s Cross which provide good connectivity to the surrounding area and other modes of public transport. The 44b Bus route at Lambs Cross which connects to Dundrum Luas Station and the 114 Bus, which runs to Blackrock DART station.

The TFI 90 Minute Fare, which was introduced by TFI, includes the flexibility to transfer between Dublin Bus, Luas and most DART, commuter rail (zones 1 to 4 in the Short Hoop Zone) and Go-Ahead Ireland services in Dublin – just touch on your last journey within 90 minutes of the first.

These modes of transport provide direct connections through the city region, including the city centre, where residents can easily transfer to other routes and modes for onward connectivity.

Transport infrastructure in the immediate area is being upgraded by way of the Blackglen Road Improvement Scheme, which is now underway. The scheme includes new bus stops and cycle lanes along Blackglen Road that will directly enhance the accessibility and connectivity of the subject site.

It is also noted that Sandyford Road is identified in the Development Plan 2022 as having a 6-year Road Objective, which if delivered, will significantly increase the capacity of the road network, which may support additional bus services available to future residents of the proposed development, in line with Bus Connects.

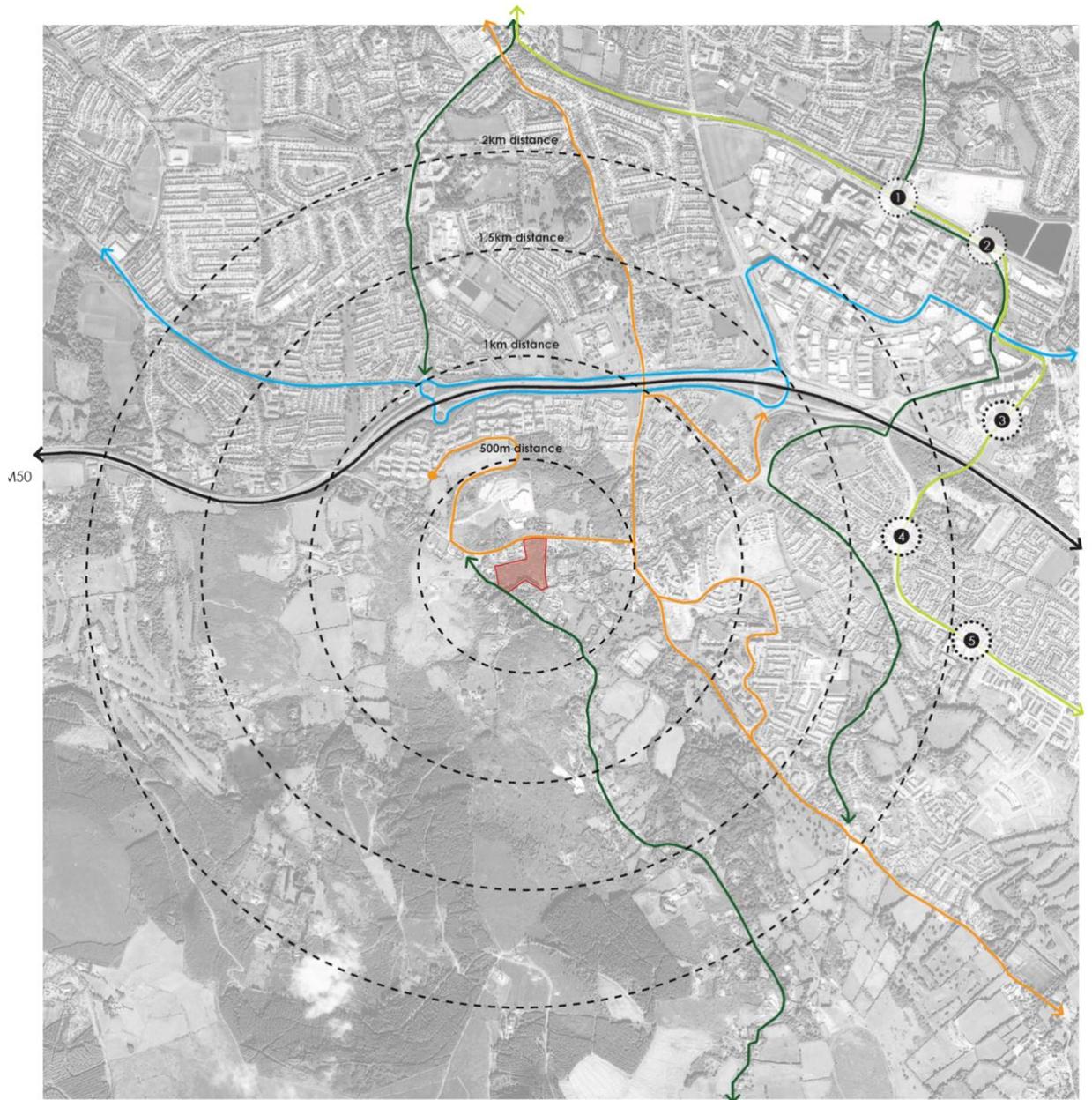


Figure 9 - Map showing public transport

Public Transport Key

- | | | | |
|---|-------------------------|---|---------------------|
|  | S8 Orbital Bus Route |  | L33 Local Bus Route |
|  | P13 Peak Time Bus Route |  | LUAS Green Line |
|  | Stillorgan LUAS Stop |  | Sandyford LUAS Stop |
|  | Central Park LUAS Stop |  | Glencairn LUAS Stop |
|  | The Gallops LUAS Stop | | |



At present, two Dublin Bus routes are located within 120 meters of the site entrance. The northern boundary of the site is located approximately 110m (2 minute walk, 1 min cycle) from the nearest bus stop, Blackglen Court Stop 3533 east and stop 3494 west, which is served by Dublin Bus Service No. 44B and Go ahead service 114.

The Dublin Bus operated service 44B operates on weekdays only whilst the Go- Ahead operated service 114 operates on a daily basis seven days a week and offers frequent services as summarised in Table 2.1 below.

Operator	Route No.	Route	Mon -Fri	Sat	Sun
Dublin Bus	44B	Dundrum Luas – Glencullen	5	-	-
		Glencullen – Dundrum Luas	5	-	-
Go Ahead	114	Rockview – Blackrock Station	17	15	10
Bus		Blackrock Station - Rockview	17	15	10

Table 1 - Bus Service [Source:TFI]

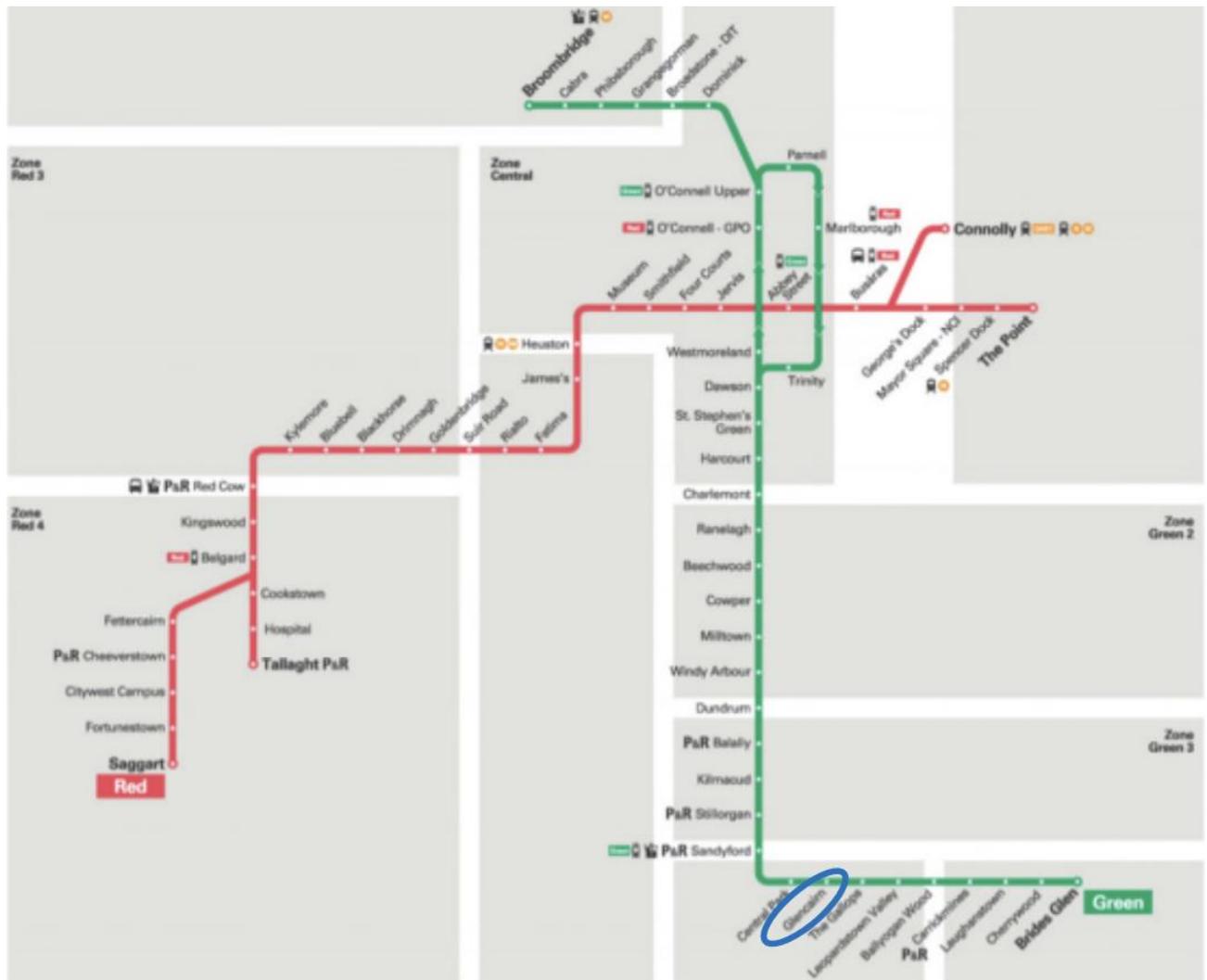


Figure 10 - Luas Greenline Destinations [Source: Luas]

As stated above the closest LUAS Green Line interchange (Glencairn) is located approximately 1.9km (22-minute walk) walking distance to the east of the subject site via the Hillcrest Road and Kilgobbin Road. The LUAS Greenline currently provides access to Sandyford, Dundrum and the City Centre to the north and intermediate destinations along its route (Figure 2.6). Table 2.2 below summarises the frequency with which the Luas Green Line service operates. Dublin Bus Route 44B as introduced previously also provides direct access to Luas Greenline services at Dundrum whilst Go Ahead service 114 provide direct bus access to Luas Greenline services at Sandyford.

Time	Monday – Friday	Saturday	Sunday
Peak	9	14	12
Off Peak	13	16	14

Table 2 - Luas Service Frequency (minutes)

Character Area

“Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into / enhance the character and public realm of the area having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual impact assessment, by a suitably qualified practitioner such as a chartered landscape architect”.

These proposals are supported by a Landscape Visual Impact Assessment (LVIA) provided by Richard Butler from Model works.

At the scale of the district / neighbourhood / street

Public Contribution

‘The proposals outlined responds to its overall natural and built element and make a positive contribution to the urban neighbourhood and streetscape’.

The character and public realm area within the site provides for an openness with high quality public open space at its centre. This open space is activated by a public pedestrian and cycle route through the site providing permeability and ease of access to connect to Fitzsimmons Woods.

In addition, to this public route, the arrangement of buildings along Blackglen Road activate this edge and the street by providing ‘own door’ accessible apartments at ground level combined resident amenities and facilities integrated into an attractive landscape plan around the arrival court into the development formed by the gap framed by Blocks A1 and A2.



Figure 11 - Ground Floor pedestrian / cycle access and internal routes

Key

-  Pedestrian and Bicycle Access
-  Pedestrian Routes
-  Cycle Route

Building form and material expression

- *“The proposals are not monolithic and avoid long, uninterrupted walls of building in the form of slab blocks with material / building fabric well considered”.*
- *“The proposal enhances the urban design context for public spaces and key thoroughfare.... thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure”.*
- *“ The proposal makes a positive contribution to the improvement of legibility through the site and wider surrounding neighbourhood area within which the development is situated and integrate in a cohesive manner.”*

The building form and material expression of the proposed buildings forming the streetscape along Blackglen Road have been carefully articulated to provide an attractive streetscape composition with a series of pitched roof ends expressed and providing a rhythm to the street. The design of the apartment buildings within the centre of the site are informed by the site physical characteristics and the sloped nature of the land. The lower hillside comprises of the 'B' blocks which are arranged as clusters of splayed elements set into the hillside and stepping back up the contours to integrate into the natural slope. The upper hillside is characterised by the 'C' blocks which step down in height along its edges adjacent to existing residential properties.



Building Form and Material Expression

Material Palette 01



1.



2.



3.



4.

Material Palette 01

1. Brickwork in Kingscourt - Engels Mystique laid in stretcher bond with flush mortar joints
2. Pigmented pre-cast concrete in a hue to complement the brickwork. Aggregate type and size range to be consistent between Material 1. Different finishes are used in different locations with varying degrees of aggregate exposure
3. PPC aluminium in a RAL 7038 finish is used to compliment the brickwork
4. Slate roof tiles used to compliment the neighbouring Blackglen Road cottages to the East



Material Palette 02



1.



2.



3.



4.



5.



6.

Material Palette 02

1. Brickwork in Kingscourt - Engels Mystique laid in stretcher bond with flush mortar joints
2. Pigmented pre-cast concrete in a hue to complement the brickwork. Aggregate type and size range to be consistent between Material 1. Different finishes are used in different locations with varying degrees of aggregate exposure
3. PPC aluminium in a RAL 7038 finish is used to compliment the brickwork
4. Anodised aluminium in a brushed bronze finish is used to compliment the brickwork
5. Brickwork in Kingscourt - Grey laid in stretcher bond with flush mortar joints
6. Dry stone wall made from excavated stone from the site

Material Palette 03



1.



2.



3.



4.



5.

Material Palette 03

1. Brickwork in Kingscourt - Engels Mystique laid in stretcher bond with flush mortar joints
2. Pigmented pre-cast concrete in a hue to complement the brickwork. Aggregate type and size range to be consistent between Material 1. Different finishes are used in different locations with varying degrees of aggregate exposure
3. Anodised aluminium in a brushed bronze finish is used to compliment the brickwork
4. PPC aluminium in a RAL 7038 finish is used to compliment the brickwork
5. Dry stone wall made from excavated stone from the site

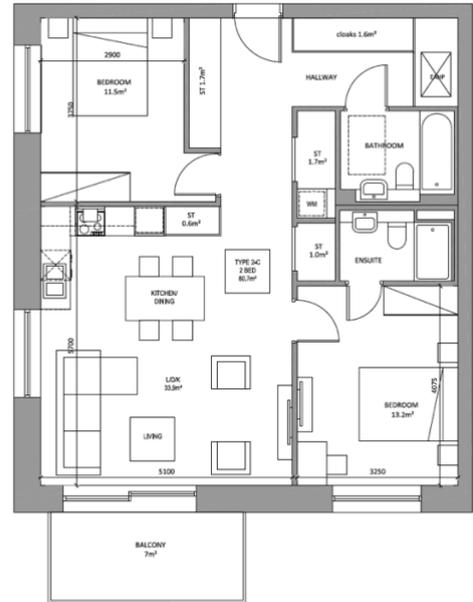
Typical Unit Typologies

“The proposal positively contributes to the mix of uses and /or building / dwelling typologies available in the neighbourhood”.

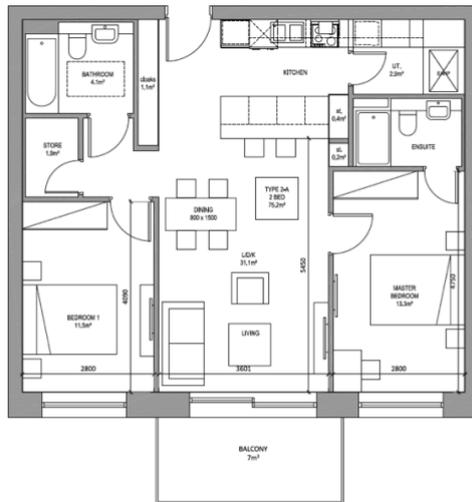
The provision of apartments provides for an alternative an affordable model to the more established, traditionally larger 3 and 4 bedroom private housing typology in the immediate vicinity. The proposed development will comprise of a mixture of apartment type and sizes from 1 bed, 2 beds, and 3 beds, providing additional choice and badly needed supply in the area which is supported by high employment in nearby Sandyford.



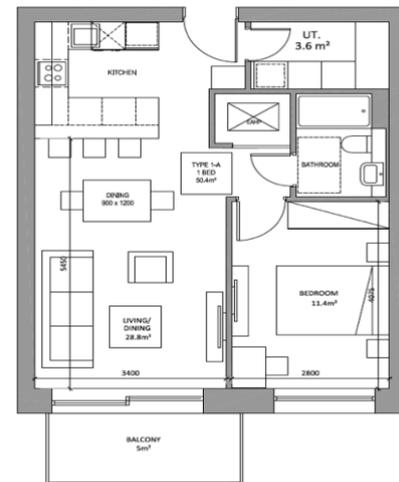
Type 2B - 2 Bed Corner Unit



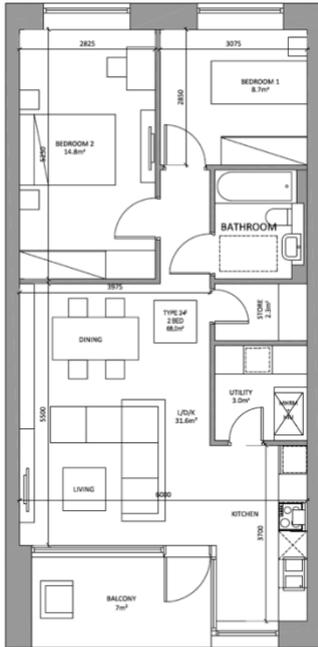
Type 2C - 2 Bed Corner Unit



Type 2A - 2 Bed Dumbbell Unit



Type 1A - 1 Bed Unit



Type 2F - 2 Bed Through Unit



Type 3A - 3 Bed Corner Unit

At the scale of the site / building

- “The form, massing and height of the proposed development is carefully modulated so as to maximise access to natural daylight, ventilation and views and maximise overshadowing and loss of light.”
- “Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building research establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd Edition for BS 8206-2:2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.”
- “Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or effective urban design and streetscape solution.”

These aspects are supported by a detailed daylight and sunlight assessment which is prepared by OCSC and submitted as part of this application.

It is noted that specific assessments to support proposals at some or all of the scales described above have been provided with the application and include the following:

- Micro-Climature Assessment
- Architectural Conservation Report
- Ecological Report

In summary, we are of the opinion that the height and density is appropriate given the zoning and rationale in relation to the developments site-specific characteristics, context and setting as set out above.



Figure 12 - Consolidated Concept Plan

4 Response to Specific Information Requested

In its Opinion An Bord Pleanála also requested submission of the following specific information with any application for permission:

1. **An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections, and national and local planning policy. The statement should specifically address height, scale, and massing, finishes of the blocks, the design relationship between the individual blocks within the site, as well as the PA comments as to the transitional nature of the site in a peripheral urban location and the interface along the site boundaries, the statement should be supported by contextual plans and contiguous elevations and sections.**

In addition, the Design Statement should include consideration of the comments provided by the planning Authority Heritage Officer and how the proposed design responds to the derelict cottage outside of the site boundary with historic associations with Padraic Colum and Countess Marchievicz.

Response:

Please refer to OMP's Design Statement and Response to ABP and DLRCC Opinion which addressed all of the points outlined above. With regards to how the design responds to the derelict cottage outside the site boundary, firstly the ruined structure to the northern boundary was formerly two semi-detached stone-built cottages.

The ruined cottages adjacent to the application site are not protected structures and have not been included in the survey carried out by the National Inventory of Architectural Heritage. The site is not in an architectural conservation area and not adjacent to or close to an architectural conservation area. The site and its surrounding area is zoned residential.

It is proposed to develop the lands to the west of the cottages, between Blackglen Road and Woodside Road. The proposal includes a spine road running between the two abounding roads, with apartment buildings distributed at intervals on either side of the road. The proposed spine road would run past the ruined cottages on an alignment parallel to the rear wall and at a distance of approximately 25 metres. Alongside this road to the south-west of the cottages an ESB substation would be located. The area between the proposed road and the cottages is to be part of the landscaped perimeter of the site.

The proposed layout will keep the apartment buildings at a remove from the cottages, the closest being a two-storey section of an apartment building at a distance of 30 metres, though at a higher elevation than the cottages. The five-storey element of that apartment building would be 40 metres from the cottages.

Given that the application site and the area in general have been zoned for residential purposes the planning authority has accepted that development will occur. The layout now proposed will ensure that development is kept away from the immediate vicinity of the two cottages and the proposal to retain a belt of landscaping along the boundary of the site near the cottages and to locate the nearest building at a reasonable distance will ensure that the effect on the character and setting of the cottages will be minimised.

2. **A Traffic and Transportation Impact Assessment (including justification of two access points proposed off Blackglen Road). The TIA should include a detailed statement, demonstrating how the proposed development will tie in with the road network, along Blackglen Road and Woodside Road, in particular with respect to pedestrian and cycle routes and the Blackglen Road Improvement scheme.**

Please find submitted with this application full Traffic Impact Assessment prepared by O'Connor Sutton Cronin (OCSC) which sets out how the proposed development ties in the existing road network along Blackglen Road and Woodside Road in particular in respect to pedestrian and cycle routes and the Blackglen Road Improvement Scheme.

The northern boundary of the site is located approximately 1.9km (25 min walk, 9 min cycle) from Glencairn Train Station (Green Luas Line). This station provides access to Brides Glen in the east, and



Broombridge in the north. This forms part of the wider Luas network throughout the Greater Dublin Area and links the site directly to Dublin City Centre and the Red Luas. In addition, the northern boundary of the site is located approximately 110m (2 minute walk, 1 min cycle) from the nearest bus stop, Blackglen Court Stop 3533 east and stop 3494 west, which is served by Dublin Bus Service No. 44B and Go ahead service 114.

These services operate during peak hours, every 30 mins, and provide connections to nearby urban centres such as Sandyford and Blackrock. Neither bus route currently provides connections to the city centre. It is noted that BusConnects plan for the area include the introduction of bus services 86, 87, 88 and L33.

The bus connection available in the area, including Blackglen Road itself:

- No. 44 Dublin Bus - available from Blackglen Road which travels between Glencullen and the Dundrum Luas Stop.
- Go Ahead 114 – available from Blackglen Road which operates between Blackrock and Simons Ridge, Sandyford. This route allows easy public transport links to the Dart and Coastal Dublin towns and Villages and their associated amenities.
- No. 47 to Poolbeg street and 118 from Kilternan to Eden Quay are also available from the Murphystown Way Bus Stop.
- No. 44 Bus is available from the Kilgobbin Road and travels from Enniskerry to Dublin City University every 30mins.

No's 44,47 and 114 bus stops are all within reasonable walking distance of the site at Blackglen Road (c.15-20mins).

The local cycle facilities consist of Radial and Orbital Cycle Routes, which span most of the county. The radial routes mainly service north-south movements, while the orbital routes service east-west movements. The closest connection is on the R117, which is approximately 450m (1 min cycle) from the northern boundary of the site.

Currently there are no pedestrian infrastructure present along Blackglen Road. As stated previously, construction commenced in summer 2021 on the Part 8 road improvement scheme at Blackglen Road and works are expected to last 18 months. This scheme will improve walking and cycling infrastructure in the immediate vicinity, which will significantly improve accessibility for this development. The improvement entails the upgrade of 2.02 km of road, and includes the following transport infrastructure related items:

- Construction of pavement, footpaths and cycle lanes which are currently not present along Blackglen Road;
- Upgrading of existing signalized junctions at Lambs Cross and Grange Road/Harold's Grange Road/Kellystown Road/College Road and new toucan crossing on Blackglen Road;
- Upgrading of bus stops on Blackglen Road, Sandyford Road and Enniskerry Road.

Specific to this site, walkways and cycle lanes will be added to both sides of the road adjacent to the site frontage. These upgrades will tie into the larger network and provide access to a variety of public transport services, including bus routes and the Luas Green Line.

The development will be accessed via Blackglen Road. One main access to the development will be provided, with a second pedestrian access just east of this. The second access will provide access to a portion of car parking for the site only.

The most significant issue in the application relates to the deficiency of the local road network, which undoubtedly restricts the delivery of residential units. However, this impediment to development is now on a clear timeline to resolution, with construction of the Blackglen Road widening works having commenced in 2021. As already stated, the upgrade works will provide a new network of cycle paths and footpaths to link the site back to the Neighbourhood Centre and wider employment areas. The improved connectivity of the site enables the delivery of residential units in accordance with national planning policy.

3. ***A Road Safety Quality Audit, as applicable should be submitted in support of the proposed access and traffic arrangements.***

Response:

Please find submitted with this application Road Safety Audit prepared by Bruton Consulting Engineers and the Traffic Impact Assessment prepared by OCSC which details the proposed access and traffic arrangement.

4. ***A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the Development Plan other than in relation to the zoning of the land, indicating why permission should, nonetheless be granted, having regard to Consideration specified in section 37(2)(b) of the Act of 2000.***

Response:

A detailed Material Contravention Statement has been prepared by Brock McClure and accompanies this planning applications. The Material Contravention statement provides justification as to where the proposed development materially contravenes the Development Plan.

The relevant provisions of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 as they relate to the matters of building height, mix of units, residential density, and Transitional Zones are outlined in the submitted Material Contravention Statement

5. ***In accordance with section 5(5)(b) of the Act 2016, as amended, any application made on foot of this application should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objective of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.***

Response:

Enclosed with this application, is a combined Planning Report and Statement of Consistency Report. In section 9 of this combined report, Brock McClure presents the proposed development and how it is consistent with the relevant Strategic Planning Documents.

In Section 10 of the report, Brock McClure detail how the proposed development has regard to the Local Planning Document, the Dun Laoghaire Rathdown Development Plan 2022-2028.

6. ***Additional details and/or revised proposals in relation to site services, having regard to the report of the Drainage Planning Section of the Planning Authority. Additional detail and/or revised proposals in relation to the SuDS, attenuation measures and drainage calculations; Further consideration is also required with Irish Water to confirm the feasibility of connection to the network.***

Response:

Please find attached Engineering Report prepared by OCSC which provides details in relation to the SuDS, attenuation measures and drainage calculations for the proposed development. In addition, OCSC have also prepared an additional standalone response to the pre planning comments Ref PAC/SHD/108/21 regarding the proposed development. In this document OCSC have addressed items pertaining to the Drainage Planning Report Date: 26th November 2021.

A Pre-Connection Enquiry Form (IW Ref Nr. CDS21001337) was submitted 26th February 2021 to Irish Water for a total of 450 no. residential units. Feedback on this enquiry has been received and states that the development is feasible subject upgrades to the existing network. A new Pre-Connection Enquiry Form (IW Ref Nr. CDS22002623) was submitted 06th April 2022 to Irish Water for a total of 360 no. residential units. Feedback on this enquiry has been received and states that the development is feasible without infrastructure upgrade by Irish Water. Refer to Appendix G of the Engineering Report by OCSC for Confirmation of Feasibility. A subsequent Statement of Design Acceptance was issued by Irish Water on 12th May 2022. Refer to Appendix G of Engineering Report for a copy of this letter.



7. **A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculation and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standard in terms of dual aspect and proportion of apartment which exceed the floor area by 10%. In the interest of clarity clear delineation / colour of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect and which apartment exceeds the floor area by 10%.**

Response:

Please refer to OMP's Appendix D – Housing Quality Assessment which sets out the developments compliance with minimum standards.

Please see Appendix A – Part V and Appendix C – Dual Aspect for colour coding

8. **A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically with regard to potential overlooking, overshadowing, and overbearing. The report shall include full and complete drawings including levels and cross sections showing the relationship between the proposed development and adjacent residential development, and comprehensive Daylight and shadow Impact Assessment.**

Response:

We refer to the detailed Landscape Visual Impact Assessment (LVIA) report prepared by Modelworks, which includes updated photomontages, submitted with this application which supports the position that the adjusted design would not result in any negative visual impact.

The main sensitivities in the area are the existing low density residential properties to the east and west along Blackglen Road, to the south east in the Slate Cabin Lane area, and along Woodside Road. While low density residential use is generally sensitive to the introduction of higher density development typologies, there are factors that indicate there is some capacity (and requirement) to accommodate change:

- Generally, the existing houses' amenities derive principally from
 - a) their detached typology and large size,
 - b) their correspondingly large gardens which are well vegetated, limiting visibility of the surroundings apart from framed views,
 - c) the views north over Dun Laoghaire Rathdown towards Dublin Bay afforded by their elevation, and
 - d) the generally high degree of visual enclosure generated by the quantity of trees in the area.

The proposed development generally does not threaten any of these conditions.

- The existing development pattern cannot be considered sustainable and the area is due to undergo substantial, planned change
- It is county-level and national policy to consolidate and densify the urban area to make the most efficient possible use of physical and social infrastructure. The implication of this is that new high density typologies -i.e. taller buildings -will be introduced to previously low density areas, unavoidably changing their character and the composition of views from the public realm and private property

The specific views along Slate Cabin Lane and Woodside Road reference above now take account of the adjusted building height and design following the Tripartite Stage Meeting.

These illustrate an appropriate response that the proposals would not be out of context in terms of scale or overbearing and would not result in any significant negative visual impact.



1 Verified View 03



2 Verified View 05



3 Verified View 07



4 Verified View 08



5 Verified View 09



6 Verified View 12

The overall building form and layout is set up by a series of key adjacencies and continuation of existing building lines. These set up a series of building blocks, each responding to different conditions.

The following section explain the sectional relationships and stepping down towards the boundaries relative to the separation distances to the existing residential neighbouring properties. These have been used throughout the design process in order to reduce the impact of the proposal on adjacent neighbouring properties.

The separation distances between the proposed development and the surrounding Blackglen Road properties to the North are 12m at a podium level and 20m between adjacent residential windows. In addition to the considerable setback distance provided along the North Eastern boundary, the visual impact from Blackglen Road is diminished further by the presence of the existing tree belt which provides a continuous 'green veil' along the East, South and Western boundaries to the site.

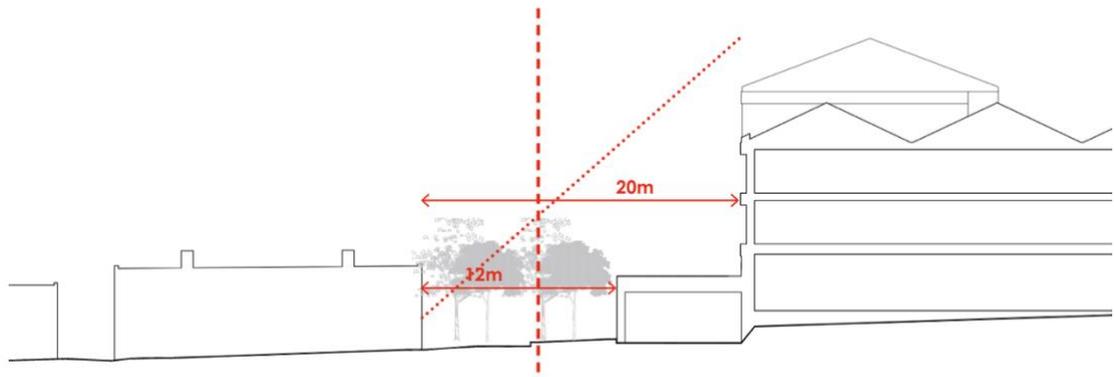


Figure 13 – Separation distances to the north

The separation distances between the proposed development and the surrounding Blackglen Road properties to the East are 40m. In addition to the considerable setback distance provided along the Northern boundary, the visual impact of the proposal is reduced with the three storey shoulder height facing East towards the neighbouring property.

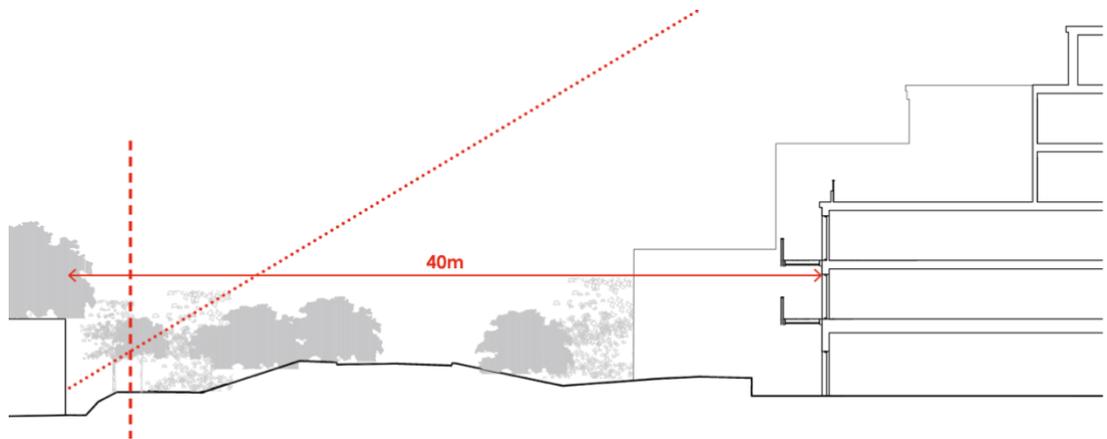


Figure 14 – Separation distances to the east

The separation distances between the proposed development and the surrounding Blackglen Road properties to the North are 33m. In addition to the considerable setback distance provided along the Northern boundary, the visual impact from Blackglen Road is diminished further by the presence of the existing mature tree belt which provides a continuous ‘green veil’ along the Northern and Eastern boundary to the site.

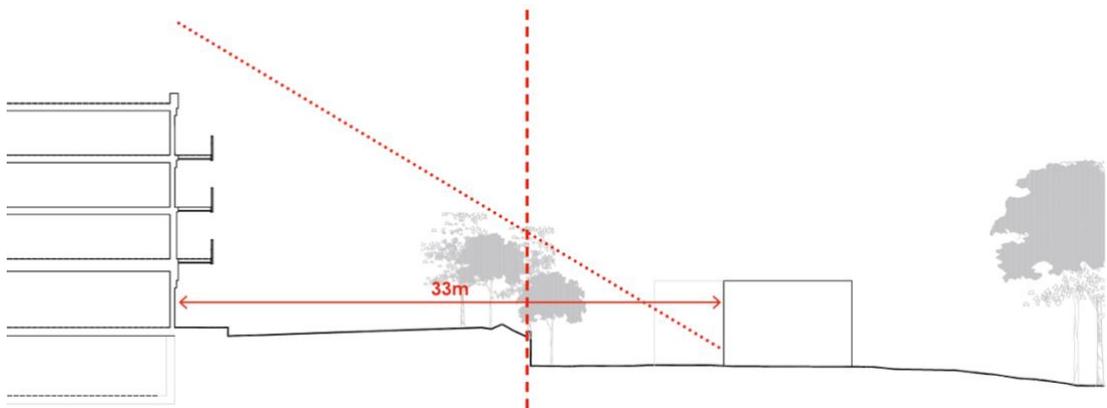


Figure 15 - Separation distances along northern boundary

In addition to the LVIA prepared by Modelworks, OCSC have also prepared a Daylight and Sunlight Report which also considers any potential daylight or sunlight impact the proposed development may have on properties adjacent to the site. The analysis also shows that the proposed building has imperceptible daylight and sunlight to windows impact to neighbouring properties. The overshadowing images have demonstrated that the only impact to adjacent properties will be to those located to the East of the proposed development. A minimal impact will be perceived on March 21st after 3 p.m.

9. Details of a Green Infrastructure Plan, Landscaping Plan, Arboricultural Drawings, and Engineering Plan that take account of one another.

Response:

Please find attached Landscape Design Rationale and Accompanying drawings prepared by Gannon and Associates which sets out details in relation to Green Infrastructure Plans and Landscaping Plan. In addition, Enviroguide have prepared a Arboricultural Report and accompanying drawings to include Tree Protection plan and Tree Survey Constraints Plan. Furthermore as noted previously above OCSCS have prepared a Engineering Report and drawings which have been submitted with the application.

10. Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. Proposals for play equipment, street furniture including public lighting and boundary treatments should be submitted. Justification of quantum and quality of open space provision, both communal and public open space. Clarity with regard to change in levels, compliance with Development Plan standards and planting details. Where compliance with the relevant Development Plan is not proposed clarity in this regard should be provided and as applicable justification having regard to S.37 (2)(b), and material contravention statement.

Response:

In response, Gannon + Associates have provided a complete drawing package coupled with a Landscape Design Rationale which illustrate the hard and soft landscaping proposals demonstrating a high quality landscape design of public and communal open space has been provided for.

The concept of an ecological park along the Green Ribbon provides meaningful public space that is functional, aesthetic and creates a unique sense of place for the future residents and the wider community.

A quality audit has been provided for in the Landscape Design Rationale, coupled with a way finding plan in the form of the Green Ribbon Eco Trail map also accompanies this application.

A detailed drawing outlining the provision of public open space which is in excess of the development plan standards is also included.

All levels and details have been illustrated within our landscape drawing package.

11. A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban Housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments, Particular regard should be had to the requirement to provide a high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Response: Aramark

Please refer to the Building Lifecycle Report prepared by Aramark, which reviews the outline specification set out for the proposed development and explores the practical implementation of the

design and material principles which has informed design of building roofs, façades, internal layouts and detailing of the proposed development.

Building materials proposed for use on elevations and in the public realm achieve a durable standard of quality that will not need regular fabric replacement or maintenance outside general day to day care. The choice of high quality and long-lasting materials, as well as both soft and hardscape in the public, semi-public and private realm will contribute to lower maintenance costs for future residents and occupiers.

12. A social Infrastructure Capacity Assessment (including school capacity assessment).

Response:

Please refer to Brock McClure's Social Infrastructure Capacity Assessment, which sets out details of the requirement for social Infrastructure, within and around the proposed development.

13. Additional CGIs are required, as well as a Landscape and Visual Impact assessment with photomontages, to include consideration of winter views from the surrounding areas.

Response:

Please refer to Modelworks submitted CGI's and Landscape and Visual Impact Assessment which include the necessary photomontages.

14. A full response to matters raised within the PA Opinion and Appended Dun Laoghaire Rathdown County council Department comments submitted to ABP on 10.11.21.

Response:

Please refer to Section 5 of this report which provides responses to matters raised within the PA Opinion and the Appended Dun Laoghaire Rathdown County Council comments submitted on 10th November 2021.

15. Where an EIAR is not being submitted, the applicant should submit all necessary information referred to in article 299B (1)(b)(ii)(II) and article 299B (1)(c) of the Planning and development Regulations 2001-2018 for the purpose of EIAR Screening.

Response:

Please refer to the attached Statement in accordance with Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, (as amended). This Statement is to be read in conjunction with the Environmental Impact Assessment (EIA) Screening Report that was also prepared in relation to the proposed strategic housing development.

The purpose of the Statement and the EIA Screening Report was to identify and assess any potential for environmental impact as a result of the Proposed Development and to determine if EIA is required for the Proposed Development and indicate how available results of relevant assessments of effects on the environment have been carried out pursuant to relevant European Legislation.

The Statement, in conjunction with the EIA Screening, determined that, based on best scientific knowledge, that the Proposed Development is unlikely to result in significant effects on the environment and, as such, an Environmental Impact Assessment is not required.

16. An up-to-date Ecological Impact Assessment, inclusive of Bird and Bat Survey.

Response:

Please refer to the accompanying Ecological Impact Assessment, which includes a bird and Bat survey, provided by Enviroguide.

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

Response:

It is intended that the proposed development will not be offered to be taken in charge by Dun Laoghaire Rathdown County Council.

18. Site Specific Construction and Demolition Waste Management Plan (including consultation with the project engineer for the Blackglen Road Improvement Scheme and with DRDCC traffic department).

Response:

A Site-Specific Construction and Demolition Waste Management Plan has been included with the submission (Z040-OCSC-XX-XX-RP-C-0003). The construction of this development will only commence following the completion of the Blackglen Road Improvement Scheme, however consultation with the various stakeholders will be actioned during the Detailed Design Stage.



5 Response to Dun Laoghaire Rathdown Opinion

- a. **Based on relevant national planning guidance (in the form of section 28 Guidelines and Department Circulars), it is considered that the site comprises a peripheral urban location, for which appropriate densities are identified to be in the range 35-50 (broadly below 45 dwellings per hectare net, according to the Apartment Guidelines).**

Please see response to ABP Opinion Section 2.1 Item 01 Architectural Design Approach for OMP's Design response.

- b. **Having regard to the information contained within the documentation submitted, serious concerns arise in terms of the proposed scheme and its accordance with the County Development Building Height Strategy and the Urban Development and Building Height Guidelines, 2018.**

Please see response to ABP Opinion section 2.2 item 02– Connectivity for OMP's Design Response

- c. **A revised set of photomontages should be provided including winter views to allow for a comprehensive assessment of year-round visual impacts. Additional views should be incorporated from certain relevant locations as outlined above.**

A full set of winter photomontages (for the same viewpoints for which summer photomontages were previously prepared); have been provided by Modelworks, and accompany this application.

Several new winter photomontages have been prepared, including (a) three views from Sandyford Road south of the M50, and (b) a view from the public viewing point on Blackglen Road to the west of the site, and (c) an additional location on Ticknock Road.

Where relevant, cumulative photomontages have also been prepared, showing the Blackglen Road SHD scheme (currently under consideration by ABP) in combination with the proposed development.

- d. **A Construction Management Plan, which shall include a phasing plan, agreed in advance with DLR's Blackglen RIS project team - shall be provided as part of any future application to ensure that any development works on site and associated construction traffic movements will fully align and will not hamper the carry out of the road improvement works.**

Please refer to O'Connor Sutton Cronin's Construction Management Plan, accompanied with this application.

- e. **The Applicant should be requested to review the proposed road layout, with a view to removing the vehicular access from Blackglen Road to the podium carpark of Block A2, in order to avoid conflicting traffic movements and avoid any potential traffic hazard.**

The additional entrance to block A2 is required, and the inclusion of such has been motivated in both the Engineering Services Report (Z040-OCSC-XX-XX-RP-C-0005) and the Traffic Impact Assessment (Z040-OCSC-XX-XX-RP-C-0001)

- f. **A full Arboricultural impact assessment should be provided detailing impacts and protection measures to existing vegetation.**

A detailed Arboricultural Impact Assessment has been provided by Enviroguide, with this application, which details the impacts and protection measures provided to existing vegetation within the proposed development .

- g. The Applicant is advised to explore design solutions to address the concerns of the Planning Authority in terms of potential overlooking between Blocks B3 and B4.**

Please see response to ABP Opinion section 2.5 Item 05 Residential Amenity Report for OMP' design response

- h. The Applicant is requested to review the proposed unit mix with a view to increasing the number of 3-bedroom units proposed.**

Please see response to ABP Opinion section 2.2 Item 02 Connectivity for OMP' design response.

- i. A revised Sunlight and Daylight Assessment should be provided, which should include, inter alia, assessment of impacts on all proposed windows and not just on a selection.**

Please refer to O'Connor Sutton Cronin's Daylight and Sunlight Assessment which has been provided with this application. It details the assessment of impacts on all proposed windows of the proposed development.

- j. Criteria for considering a unit as 'dual aspect' should be clarified – The applicant is requested to avoid the provision of single aspect north-facing units.**

Please see Appendix A – Part V and Appendix C – Dual Aspect for colour coding

- k. The applicant should submit a "Social Infrastructure Capacity Assessment (including School Capacity Assessment)" with any future submission or application.**

Please refer to Brock McClure's Social Infrastructure Capacity Assessment, which sets out details of the requirement for social Infrastructure, within and around the proposed development.

6 Conclusion

This Statement and the suite of documentation which is referred to in this Statement and which has been submitted to the Board with the application for permission, fully addresses the issues raised and specific information requested in An Bord Pleanála's Opinion.

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in An Bord Pleanála Opinions and the comment set out by Dun Laoghaire-Rathdown County Council.

We trust that this document fully responds to all of the points raised and submit that the proposed development represents the proper planning and sustainable development of this currently underutilised site.