



**THORNTON O'CONNOR**  
TOWN PLANNING

# **Statement of Response to LRD Opinion**

**Prepared in Respect of a Planning  
Application for a Large-Scale Residential  
Development at a Site in the Townlands  
of Glenamuck North, Kilternan, Dublin 18  
(Northern Site)**

**On Behalf of Durkan Carrickmines  
Developments Limited**

February 2026

## CONTENTS

<b>1.0</b>	<b>INTRODUCTION.....</b>	<b>1</b>
1.1	Summary of Development.....	1
<b>2.0</b>	<b>RESPONSE TO THE DÚN LAOGHAIRE–RATHDOWN COUNTY COUNCIL OPINION .....</b>	<b>2</b>
<b>3.0</b>	<b>ADDITIONAL ITEMS NOTED/REQUESTED BY INTERNAL DEPARTMENTS .....</b>	<b>22</b>
<b>4.0</b>	<b>CONCLUSION .....</b>	<b>24</b>

## 1.0 INTRODUCTION

On 13<sup>th</sup> June 2025, Thornton O'Connor Town Planning, on behalf of Durkan Carrickmines Developments Limited, submitted a pre-application LRD consultation request to Dún Laoghaire–Rathdown County Council. The purpose of this document is to provide a summary response to the specific information requested by Dún Laoghaire–Rathdown County Council in their Notice of LRD Opinion (Ref. PAC/LRD2/005/25) received on 13<sup>th</sup> August 2025, further to a meeting held on 17<sup>th</sup> July 2025 with Dún Laoghaire–Rathdown County Council and the Applicant/Design Team.

The key issues /areas raised in the Opinion that must be addressed in any future application are provided in Section 2.0 & 3.0 below.

This Statement of Response has been drafted based on insights provided by the plans and particulars prepared by the Applicant and the wider Design Team. Therefore, this report must be read in tandem with these materials.

### 1.1 Summary of Development

The full description of the proposed development, as described in the Statutory Notices, is as follows:

*"Durkan Carrickmines Developments Limited intend to apply for permission for a Large-Scale Residential Development at this c. 5.2 Ha site in the townland of Glenamuck North, Kilternan, Dublin 18. The site is generally bounded by: the Glenamuck District Distributor Road to the south (to be known as the Kilternan Road); agricultural land to the west; De La Salle Palmerstown Football Club and the future Jamestown Park to the north; and sports pitches and an attenuation pond associated with the Glenamuck District Roads Scheme (ACP Ref. HA06D.303945) to the east.*

*Road works are proposed to the approved Glenamuck District Roads Scheme to provide access to the development from the Kilternan Road. The Kilternan Road access point will include works, inclusive of any necessary tie-ins to the existing footpath and cycle track.*

*The development will principally consist of the construction of a creche (c. 571 sq m) and 219 No. residential units comprising 69 No. houses (51 No. 3 -bed units and 18 No. 4-bed units), 108 No. apartments (38 No. 1-bed units, 31 No. 2-bed units and 39 No. 3-bed units) and 42 No. duplexes (11 No. 1-bed units, 9 No. 2-bed units, and 22 No. 3-bed units). The proposed development will range in height from 2 No. to 4 No. storeys.*

*The development also provides: car, bicycle and motorcycle parking; bin storage; ancillary storage; private balconies, terraces and gardens; hard and soft landscaping; boundary treatments; lighting; substations; and all other associated site works above and below ground."*

## 2.0 RESPONSE TO THE DÚN LAOGHAIRE–RATHDOWN COUNTY COUNCIL OPINION

	Items to be Addressed	Response
<b>Access and Connections</b>		
1.	<p><u>North–south and East–west connections:</u> Transportation Planning consider that the quality of north-south and east-west connections across the site could be improved for pedestrians and cyclists, by way of allocation of space, the potential provision of segregated routes, more direct routes, improved wayfinding and pedestrian/cyclist priority across the site. The Movement Objectives of SDF<sub>3</sub> of the LAP refer to this matter. The internal layout shall also be subject to a detailed independent quality audit to be undertaken and submitted as part of any future application at the site.</p>	<p>The proposed development will provide numerous north-south and east-west connections through the site and into any future development of land and the existing local pedestrian and cycle network, as illustrated in Figure 2.1. The southern boundary of the site will facilitate multiple access points along the Kiltarnan Road (Glenamuck District Distributor Road) which will link into the site’s internal street network and further into any future development of land to the west and the future Jamestown Park to the north.</p> <p>Importantly, the layout of the scheme has been designed alongside the live application on the southern lands (Reg. Ref. LRD25A/0984/WEB) as part of the wider Masterplan. The vision for the Masterplan is to provide a permeable north-south connection between the two sites and into adjoining land/developments. The layout responds to future pedestrian desire lines within and through the Masterplan area by providing multiple access points to both sites along the Kiltarnan Road. These points connect into the sites’ internal street network and generous public open space and extend northwards to the future Jamestown Park and southwards to Glenamuck Manor, further linking to the Glenamuck Road and beyond, including Kiltarnan Village.</p>

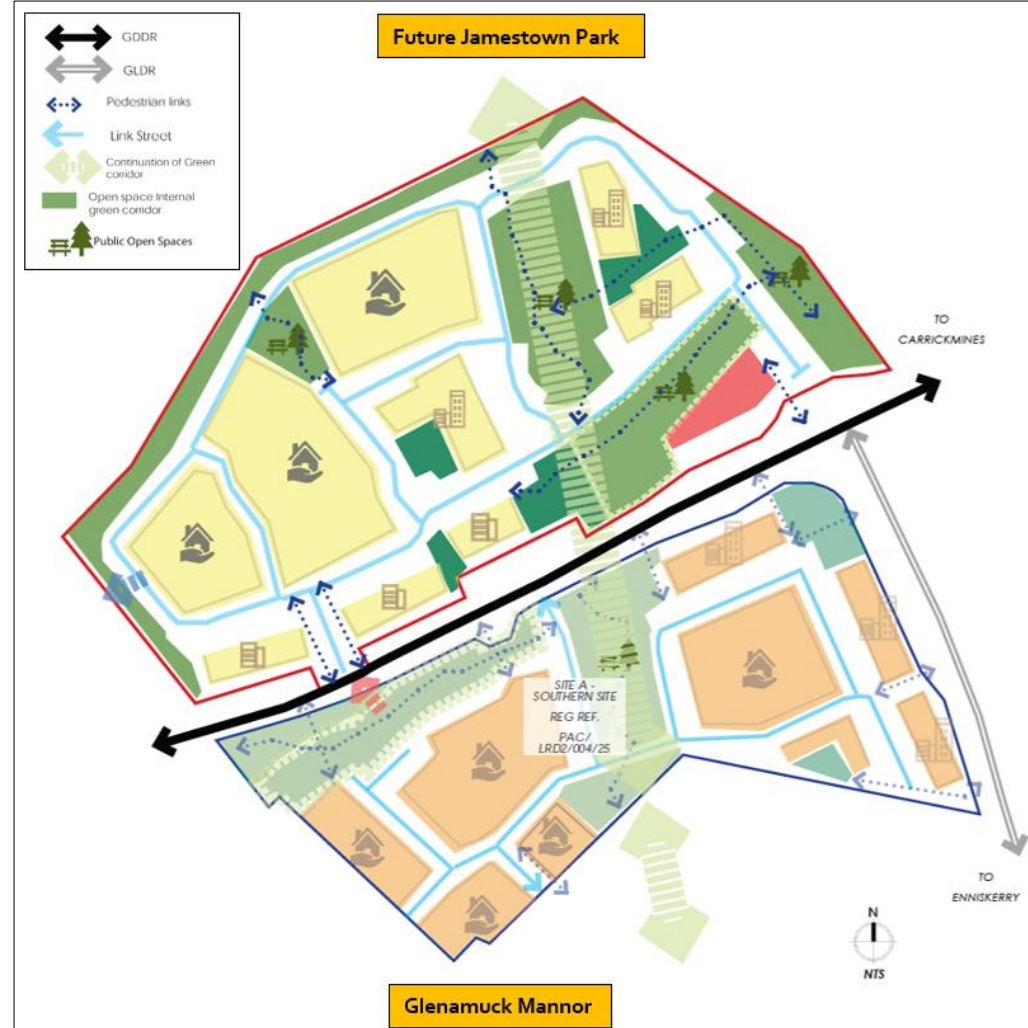
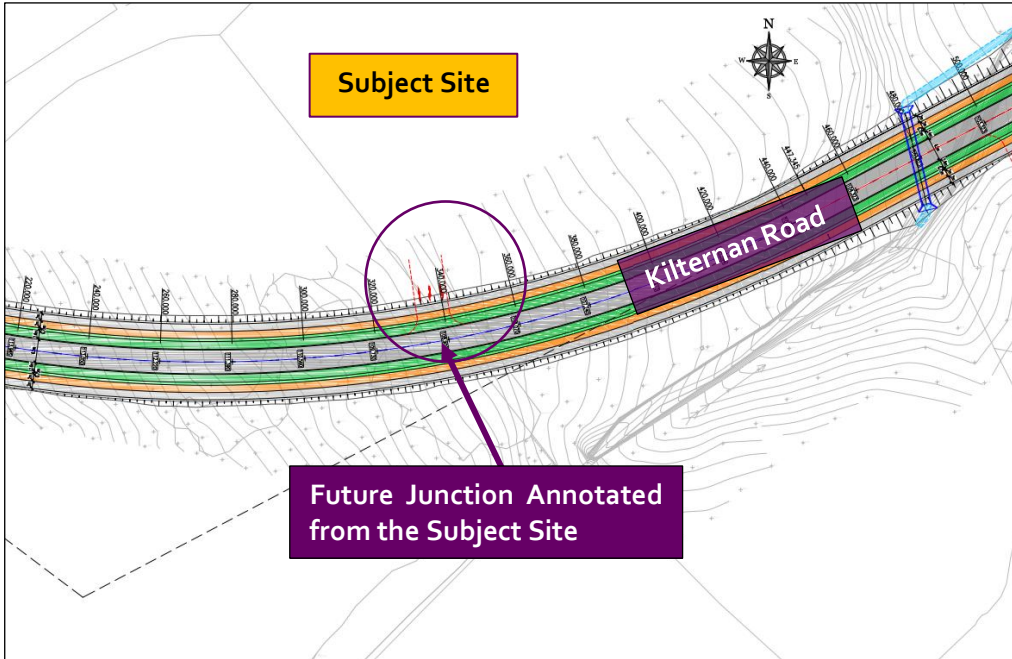


Figure 2.1: Proposed Connections at the Subject Site & Masterplan Area

(Source: *Architectural and Urban Design Statement* by MCORM Architecture, Annotated by Thornton O'Connor Town Planning, 2026)

		<p>Permeability is inherent to the design and layout of the scheme and single movement corridor has been avoided. The layout provides a legible internal street network that links residential cells, public open spaces, and surrounding future developments and public parks. Streets are laid out in a permeable grid-like structure, avoiding cul-de-sacs and enabling pedestrian and cyclist movement across the site via multiple route options. Wayfinding is supported by a clear and legible movement network, with routes aligned along natural desire lines such as the central green public open space which acts as an informal pedestrian and cyclist route through the scheme.</p> <p>Pedestrian and cycle priority is achieved through the design of the internal streets as a low-speed, low-traffic environment. As set out in the accompanying <i>Traffic and Transport Assessment</i>, traffic calming measures have been incorporated into the proposed layout in the form of reduced corner radii, shorter straight road sections, narrowed carriageway widths (DMURS compliant) and the use of homezones. These measures will naturally prioritise pedestrians and cyclists over vehicles without the need for full segregation in all locations.</p> <p>As discussed in detail in accompanying documents submitted as part of this application, the riparian corridor along the Glenamuck Stream is a fundamental landscape and ecological feature of the proposed scheme and thus hard infrastructure within this corridor has been minimised. In our opinion, a balance has been achieved between the need to: 1) facilitate permeable connections within and through the site, 2) provide large areas of public open space, and 3) protect and support biodiversity along the riparian corridor.</p> <p>All internal streets and open spaces are sufficiently passively surveyed by the proposed residential units as well as its position along the Kilternan Road, ensuring safe travel routes for pedestrians and cyclists is facilitated.</p> <p>A Quality Audit (including a Stage 1 Road Safety Audit) has been carried out as part of this subject application and is submitted herewith.</p>
--	--	---

<p>2. <b>Vehicular access onto GDRS scheme:</b> The Applicant will be required to submit a detailed justification for the location and design of the proposed vehicular onto the GDDR. The proposed layout shall also be subject to a detailed Road Safety Audit.</p> <p>All potential impacts to the GDRS scheme and existing local road network shall be assessed in detail by way of a Traffic Impact Assessment which shall include for relevant committed developments.</p>	<p>The location of the proposed vehicular access point to the site from the Kiltiernan Road has been thoroughly considered by the Applicant and Design Team having regard to the following:</p> <p><b>1. <u>Junction Envisaged in the GDRS Application</u></b></p> <p>An indicative location of an access to the subject site was identified as part of the Glenamuck Distributor Roads Scheme (GDRS) application (ACP Reg. Ref. HA06D.303945), as illustrated in Figure 2.2 below.</p>  <p><b>Figure 2.2: Future Junction Access at the Subject Site Envisioned in the GDRS</b></p> <p>(Source: As Submitted Under ACP Ref. HA06D.303945, Annotated by Thornton O'Connor Town Planning, 2026)</p>
--	---

		<p><b><u>2. Vehicular Access from the Kilternan Road Required in the Kiltiernan–Glenamuck Local Area Plan 2025</u></b></p> <p>The subject site is identified within Site Development Framework No. 3 (SDF3) in the recently adopted <i>Kiltiernan-Glenamuck Local Area Plan 2025</i> ('LAP'). We note that the provision of a vehicular access to the site via the Kilternan Road is required under the following Objective of the LAP:</p> <p style="text-align: center;"><i>"Vehicular access to the land parcel will be via one access from the Kiltiernan Road unless otherwise agreed with the Local Authority."</i></p> <p>As illustrated in Figure 2.3, SDF3 comprises two sites: the subject site and a smaller, undeveloped site to the west which is not under the control of the Applicant. We understand that development has not come forth yet for the lands to the west of the site and thus the only possible access to the subject site would be directly from the Kilternan Road. However, we note that proposed layout facilitates the infrastructure associated with a vehicular and pedestrian link up to the western boundary and any future development of these western lands will be able to continue the infrastructure into the site. This ensures the development to the west will be facilitated with access to the Kilternan Road via the subject site.</p>
--	--	---





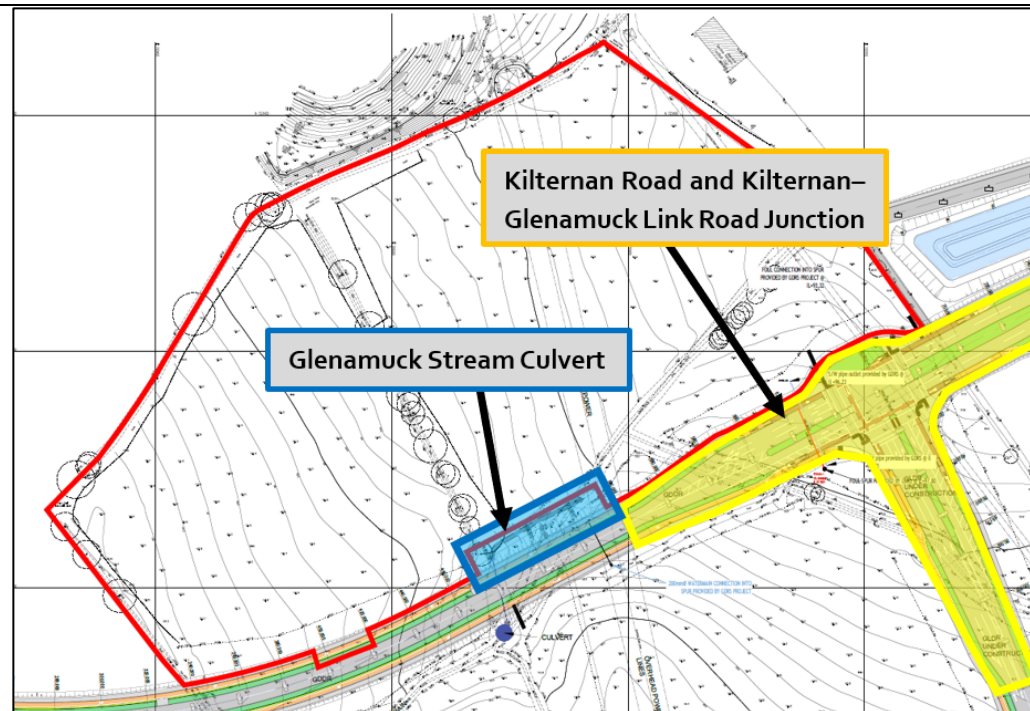
**Figure 2.3: Indicative Outline of the Subject Site (in Blue) and the Western Site (in Pink) within SDF<sub>3</sub> (Indicative Outlines Only)**

(Source: *Kiltiernan–Glenamuck Local Area Plan 2025*, Annotated by Thornton O'Connor Town Planning, 2026)

### **3. Culvert Associated with the Glenamuck Stream Along Southern Boundary**

The Glenamuck Stream flows from the southern lands (part of the Masterplan area) in a north-eastward direction before culverting beneath the Kilternan Road and re-emerging again as an open watercourse at the subject site. The Glenamuck Stream flows from this point across the south-eastern portion of the subject site before culverting again at the eastern boundary and re-emerging as an open watercourse on lands to the east of the site (currently used as sports pitches).

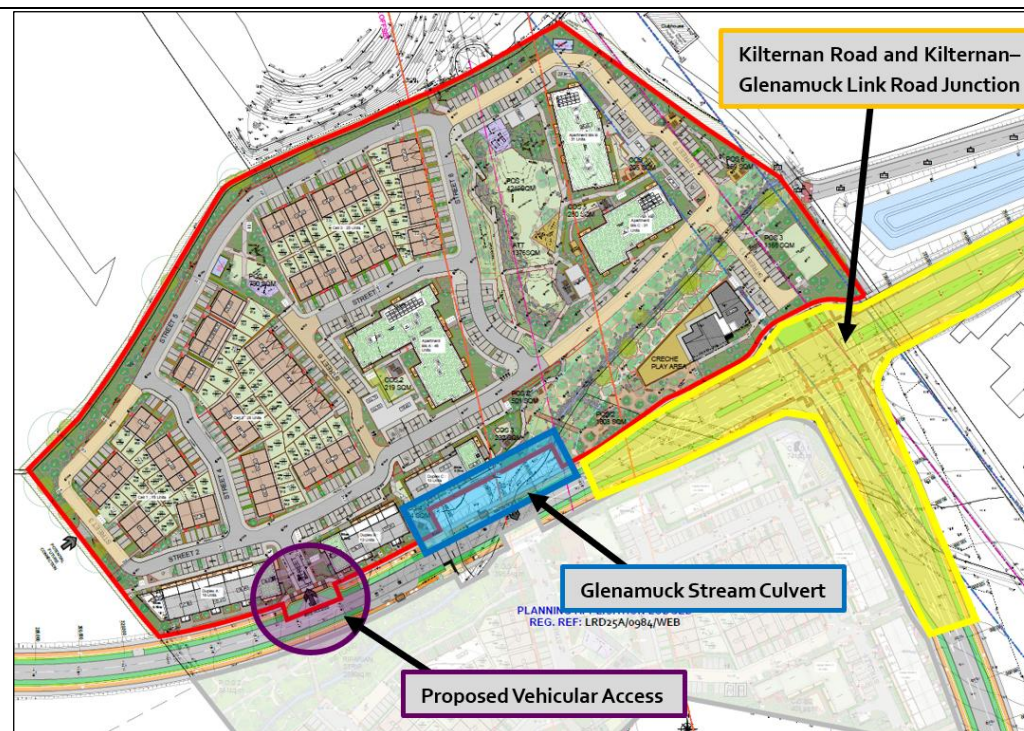
		<p>The location of the Kilternan Road culvert along the southern boundary of the site is approximately halfway along the boundary, as illustrated in Figure 2.4. Given no works can be carried out to this culvert (as the culvert is required as part of the GDRS), a central portion of the site's southern boundary along the Kilternan Road is thus restricted from providing access to the site.</p> <p><b><u>4. Proximity to the Kilternan Road and Kilternan–Glenamuck Link Road</u></b></p> <p>The junction of where the Kilternan Road and Kilternan–Glenamuck Link Road meet is located to the south-east of the subject site, with the junction layout extending across approximately half of the site's southern boundary, as illustrated in Figure 2.4. This junction restricts the provision of an access point to the site along the eastern part of the southern boundary.</p> <p><b><u>5. Proposed Vehicular Access</u></b></p> <p>The restrictions posed by the Glenamuck Stream culvert along the site's boundary and the Kilternan Road and Kilternan–Glenamuck Link Road junction layout relative to the site's boundary are outlined on the existing site layout plan provided in Figure 2.4.</p>
--	--	---



**Figure 2.4: Existing Site Plan (Outlined in Red) with the Vehicular Access Restrictions Identified**

(Source: Drawing No. 'COWLDN-MCORM-AR-XX-DR-P4-XX-1000' by MCORM Architects, Annotated by Thornton O'Connor Town Planning, 2026)

Figure 2.5 provides the same features but on the proposed site layout which clearly illustrates that the proposed new vehicular access along the site's southern boundary is the most appropriate location to provide such access. We also note that the proposed access is within the general area of the indicative access outlined in the GDRS application, thus further demonstrating the suitability of it.



**Figure 2.5: Proposed Site Layout Plan (Outlined in Red) with the Vehicular Access Restrictions and the Proposed Vehicular Access to the Site Identified**

(Source: Drawing No. 'COWLDN-MCORM-AR-XX-DR-P4-XX-1006' by MCORM Architects, Annotated by Thornton O'Connor Town Planning, 2026)

The proposed access incorporates a 6m wide vehicular entrance with an uncontrolled pedestrian crossing across the access in addition to a ramped cycle track crossing along the Kilternan Road frontage. The junction between the cycle track and the access road has been designed in accordance with Junction TL401 (Standard Cycle Track Crossing Side Road with Priority – Fully Set Back) of the Cycle Design Manual (CDM). The pedestrian crossing has been designed in accordance with DMURS Advice Note 6 (Priority Junction Tightening Measures). The design includes a stop line, associated

		<p>signage and tactile paving to alert visually impaired users to the crossing point. For further details see Meinhardt General Arrangement Drawing (No. '4428-MHT-XX-ZZ-DR-C-0100-S2') submitted with this application.</p> <p>A Quality Audit (including a Stage 1 Road Safety Audit) has been carried out which has further influenced the design and layout of the proposed vehicular access.</p> <p>Please refer to the <i>Traffic and Transport Assessment</i> prepared by Meinhardt for details of any potential impacts of the proposed development to the GDRS and local road network.</p>
<b>Kiltiernan–Glenamuck Local Area Plan 2025: Site Development Framework No. 3</b>		
3.	<p><u>Compliance with Kiltiernan-Glenamuck Local Area Plan 2025:</u> Any subsequent application shall have full regard to the development criteria outlined for Site Development Framework No. 3 and the Character Area of 'Glenamuck North'.</p>	<p>Please refer to Section 7.1 of the <i>Planning Report &amp; Statement of Consistency</i> prepared by Thornton O'Connor Town Planning submitted herewith for a response to each of the SDF3 criteria and the Glenamuck North Character Area outlined in the <i>Kiltiernan–Glenamuck Local Area Plan 2025</i>.</p>
<b>Layout and Masterplan</b>		
4.	<p>The Planning Authority recognises the constraints faced by the applicant with powerlines x 2 crossing the site. The Planning Authority note that the powerlines impact on the layout of the site and how the scheme successfully addresses the GDDR and GLDR on the current site and the southern site (referred to as Site A). The applicant is requested to review the approach taken to the issue of Public Open Space on nearby sites under the same 220kv lines as regards the extent to which these areas can be considered part of the public open space provision for the site, or must be counted as additional open space. The applicant is requested to set out the reasons why the power lines (110kv) cannot be undergrounded to facilitate an improved layout.</p>	<p>The Applicant acknowledges the presence of the 220KV overhead powerlines traversing the site in a north to south direction and the 110KV overhead powerlines traversing the site in a north-west to south-east direction. The <i>Dún Laoghaire–Rathdown County Development Plan 2022-2028</i> ('Development Plan') places a restriction on providing built development within 30-metres of a 220KV line and 23-metres of a 110KV line. The Development Plan, however, does not explicitly restrict the provision of public open space beneath these powerlines. Therefore, it is submitted that the provision of publicly accessible and usable open space beneath the overhead lines is both appropriate and consistent with established planning practice.</p> <p>The areas beneath the power lines are fully accessible, overlooked by surrounding development, and integrated into the overall open space network of the scheme. They are designed as recreational and amenity spaces incorporating lawn areas, pedestrian routes, seating, landscape planting, play spaces and biodiversity measures, rather than</p>


		<p>residual or left-over land. As such, these spaces provide meaningful recreational and visual amenity for residents and function as an integral component of the public open space provision.</p> <p>It is noted that overhead power lines are a common feature within urban and suburban environments and do not, in themselves, preclude the provision of high-quality public open space such as that proposed as part of this application. The presence of the lines does not restrict public access, passive recreation, or day-to-day use of these areas, nor does it give rise to any safety or operational issues, subject to compliance with the relevant building clearance requirements, which are met in this instance.</p> <p>The landscape design has been carefully considered to ensure that the quality and usability of these spaces is not undermined. The open character of the land beneath the power lines is well suited to informal open space, allowing for generous green areas, permeability, and visual openness. Planting proposals are specifically tailored to respect height restrictions while delivering a high standard of amenity, ecological value, and visual interest.</p> <p>Furthermore, we note that the provision of public open space under powerlines has been established on sites nearby the subject site such as Rockville Phase 2B (DLRCC Reg. Ref. D20A/0015 / ACP Ref. ABP-306999-20, amended under DLRCC Reg. Ref. Reg. Ref. D23A/0580) and Kilternan Village LRD (DLRCC Reg. Ref. LRD24A/0597).</p> <p>In their assessment of the location of the public open space beneath the 220KV powerlines as part of the "Parent" application for Rockville Phase 2B, the Planning Inspector concluded the following:</p> <p><i>"While, I note that the proposed open space area is within the restriction corridor for the 220Kv electricity line <b>an extensive area of public open space has been proposed along with communal open space.</b> Furthermore, I note the <b>proximity of other existing open space areas and the future local park.</b> Having regard to the particular constraints of the site I would concur with the opinion of the Board as detailed in their</i></p>
--	--	--



		<p><i>previous direction that <b>the proposed configuration of the surface car parking and open space areas would be acceptable</b> subject to landscaping measures to improve the public realm in the vicinity of the car park.” [Our Emphasis]</i></p> <p>Having regard to the previous assessment made by the Planning Inspector and the Commission’s decision to grant permission for Rockville Phase 2B, the DLRCC Planning Officer concluded the following in their assessment of the provision of public open space beneath the same powerlines in the amendment application:</p> <p><i>“The Planning Authority is generally satisfied with the overall layout of the scheme, in that the footprint adequately responds to the shape of the site and its constraints in relation to the overhead power line..... it is accepted in this case that <b>due to the viability of the site, the quantum and configuration of open space adequately responds to these constraints.</b>” [Our Emphasis]</i></p> <p>No concerns were raised by the DLRCC Planning Officer in their assessment of the public open space provided beneath the powerlines in the Kilternan Village LRD. It is noted that they state in their Report that the siting and configuration of the public, communal and incidental open spaces “<i>are considered acceptable on review of the submitted landscape and open space plans.</i>”.</p> <p>Furthermore, we note that Section 2.5.1 of the LAP sets out the urban design strategy applicable to the GDRS (future Kilternan Road and Kilternan–Glenamuck Link Road), including the Glenamuck North Character Area (which the subject site is located in) and other adjacent character area. In this regard, the following key landscape components listed in the LAP that relate to urban design and development principles include the following:</p> <ul style="list-style-type: none"> <li>• <i>“Provision of a “Strategic Green Corridor” which connects a series of green spaces between Jamestown Park to the north and lands to the south of the Plan</i></li> </ul>
--	--	---

		<ul style="list-style-type: none"> <li>• <b><i>Utilising the southern 110KV and 220KV powerlines as an open space spine while recognising the challenges they present.</i></b> [Our Emphasis]</li> </ul> <p>Evidently, green open spaces beneath the 110KV and 220KV powerlines is sought after in the LAP and the proposed development will contribute to this provision.</p> <p>Having regard to the above, it is submitted that the public open space provided beneath the 220kV and 110KV power lines should be counted as part of the overall public open space provision for the site. The proposed development represents an efficient and appropriate use of constrained land, ensures compliance with open space standards, and delivers usable, attractive, and well-integrated public amenity for future residents.</p> <p>Please refer to Appendix A of the <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for additional comments.</p>
5.	In conjunction with Item 1 above, the Applicant is requested to provide details on how the proposed scheme can be linked to the planned Jamestown Park (notwithstanding relevant consents and future development) by way of a pedestrian/cyclist connection on the northeastern corner of the site. There is an expectation that this would link would form part of the application at Stage 3. The Movement Objectives of SDF <sub>3</sub> of the LAP refer to this matter.	A future connection point is identified along the northern boundary of the site to connect into the future Jamestown Park to the north, as illustrated in Figure 2.6. The proposed layout facilitates the infrastructure associated with a pedestrian link right up to the northern boundary, however, as the proposed development does not physically connect into the lands and given there is no existing development to connect into, in our opinion, no Letter of Consent from the adjoining landowner is required.



		 <p><b>Figure 2.6: Location and Layout of the Future Connection Link to Jamestown Park</b></p> <p>(Source: Drawing No. 'L1_100_1' by NMP, Annotated by Thornton O'Connor Town Planning, 2026)</p>
<p>6.</p>	<p>The applicant is requested to provide details of how the current and the southern site are to be linked in terms of procedure and certainty of delivery ie. Clarity on the red and blue lines, include details of shared services / infrastructure proposals.</p>	<p>The following provides a summary of the red and blue lines of the Masterplan lands (subject site and southern lands which are subject to a live application) in terms of land ownership (noting the ownership of the southern site changed during the preparation of that application):</p> <p><b><u>Northern (Subject) Site:</u></b></p> <ul style="list-style-type: none"> <li>➤ Applicant: Durkan Carrickmines Developments Limited.</li> <li>➤ Landowner of main development site = "Cowley Family"; and</li> <li>➤ Additional land outside main development site: road works along the Kilternan Road = DLRCC's control.</li> </ul>

		<p><b><u>Southern Site:</u></b></p> <ul style="list-style-type: none"> <li>➤ Applicant: Durkan Glenamuck Developments Limited.</li> <li>➤ Landowner of main development site = Adderig 4 Residential Limited;</li> <li>➤ Additional land outside main development site: road and drainage works along the Kilternan Road = DLRCC's control; and</li> <li>➤ Additional land outside main development site: drainage works on northern (subject) land = "Cowley Family"</li> </ul> <p>The blue line shown on the OS Map submitted as part of the southern land's application (Reg. Ref. LRD25a/0984/WEB) outlines the main development site of the subject northern lands as the red line associated with the southern site extends minimally into these northern lands to facilitate part of the proposed drainage works associated with the southern development (i.e. drainage works on lands owned by the "Cowley Family"). Thus, the blue line does not represent either the southern Applicant's ownership or the southern landowner's ownership; it just represents the "Cowley Family's" ownership.</p> <p>No works are proposed on the southern lands as part of the subject development on the northern lands and thus the red line boundary does not extend into the southern lands. Given the Applicant and landowner on both sites are different and the red line boundary does not extend into the southern lands, a blue line boundary outlining the southern lands is therefore not required.</p> <p>Please refer to the <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for details on how the two sites are linked in terms of connectivity and permeability.</p> <p>A Section 32B meeting request for the southern lands was lodged to DLRCC earlier than the request for the northern lands as the layout for the northern lands required further consideration due to greater site constraints associated with the northern lands (110KV &amp; 220KV powerlines and the Glenamuck Stream traversing the site). Subsequently, the planning application for the southern lands was lodged prior to this application for the northern lands.</p>
--	--	--

		<p>Combined, the Masterplan lands will provide 354 No. residential units, a creche, and a large quantum of public open space. The 354 No. residential units will comprise a mix of houses, apartments and duplexes. While the creche is provided as part of the subject application, it will cater for the childcare demand across the Masterplan lands. The creche has been designed and sized to provide c. 571 sq m of gross floor area which will cater for 75 No. childcare spaces.</p>
7.	<p>In conjunction with Item 5 above, the Applicant is requested to give further consideration to the 'vista' on the southeastern corner of the site, at the interface of the GDDR and GLDR junction. This boundary should provide improved active frontage, linkages, and contribute positively to the visual character of the scheme and junction. It is not considered that the scheme performs successfully in terms of the need to provide suitable enclosure and street frontage. Amendments to the layout should be considered that may include the siting of the creche building. The Placemaking Objectives of SDF<sub>3</sub> of the LAP refer to this matter.</p>	<p>The development of the subject site presents an opportunity to aid in placemaking and contribute positively to the visual character of the local streetscape by providing a strong level of architectural interest along the site's frontage. The materiality and modulation of any building fronting the Kilternan Road along the southern boundary have been carefully considered by the Deam Team to provide a strong frontage, in accordance with the Placemaking Objectives of SDF<sub>3</sub> of the LAP. The south-eastern extent of the site, in particular, has been thoroughly considered given the 'vista' of the site from the junction of the Kilternan Road and Kilternan–Glenamuck Link Road.</p> <p>The proposed development includes part 3 No. to part 4 No. storeys duplex building's, high-quality public open space and a part 1 No. to part 2 No. storey creche along the site's frontage with the Kilternan Road.</p> <p>The duplexes are located along the western extent of the southern boundary and the creche and open spaces are located along the eastern extent of the southern boundary. The duplex building's provide active frontage onto the Kilternan Road by providing own door access and multiple access points and we strongly contend that the proposed creche and eastern extent of the southern boundary also provides such frontage, as detailed below.</p> <p><b><u>1. Residential Building's Not Suitable in this Location on Site</u></b></p> <p>At the initial design stage of the scheme, the Design Team investigated the possibility to provide an apartment or duplex block(s) within the south-eastern portion of the site given the strong frontage potential offered at the junction of the Kilternan Road and future Kilternan–Glenamuck Link Road. However, this is not possible due to the limited</p>

		<p>space remaining for development when the Riparian Corridor and the setbacks required from the 110 Kv AND 220 Kv overhead powerlines are provided. If an apartment or duplex block was to be provided in the remaining space, it is likely that only one building could be facilitated, which, in our opinion, would represent poor urban design as residents would be completely isolated from residents in other residential buildings. The most appropriate urban design response for this portion of the site is to provide vast public open spaces and the creche.</p> <p><b><u>2. Strong Frontage and Visual Interest Provided by the Creche &amp; Landscaping</u></b></p> <p>The proposed creche building avoids a monotonous form through the modulation and articulation in the building form, a highly considered material palette, variation in the roof profile, and stepped height from 1 No. storeys to 2 No. storeys. The building will utilise two complementary brick types, a variety of window typologies and coloured render bands to create visual interest and articulation. The roof profile comprises a series of articulated mono-pitched roof forms arranged in two directions, reflecting the playful nature of the building's use and contributing positively to the overall character of the development.</p> <p>The creche will not only provide a visually interesting vista but is also strategically positioned within this portion of the site to ensure easy and convenient access for the residential units across both the subject site and the southern lands given the creche is designed to cater for the Masterplan lands. In this regard, multiple pedestrian routes are provided to the creche from within the site and the local road network, including a connection point in front of the creche which leads direct to the Kilternan Road. These connections will increase the level of footfall and activity at this prominent junction location which will contribute positively to passive surveillance.</p> <p>The landscape strategy within this portion of the site has also been thoroughly considered by NMP to ensure appropriate enclosure is provided while contributing positively to the visual character of the site. In this regard, the public open space and the Riparian Corridor incorporate generous planting to create a vibrant setting along the</p>
--	--	---

		<p>Kilternan Road with access points provided along the boundary to increase footfall into the public open spaces and wider site directly from the local street network.</p> <p>Overall, it is the Applicant's opinion that the proposed creche building is a well-considered urban design response to the restrictions placed by the overhead powerlines and Riparian Corridor, the need to provide strong frontage at this prominent junction location, and contribute positively to the visual character of the local streetscape, as demonstrated above and in the accompanying documents submitted with the application.</p>
8.	The applicant shall set out clearly proposed vehicular and pedestrian links through to existing and future developments and to provide letters of consent from neighbouring landowners as appropriate. It is expected that where areas have been developed on adjacent sites, that linkages will be provided 'on day 1'.	<p>All vehicular and pedestrian links through the site and into existing and future developments are illustrated on the Proposed Site Layout Plan prepared by MCORM Architecture and Urban Design. A Letter of Consent has been provided by DLRCC to facilitate access onto the Kilternan Road, including any road and infrastructure works.</p> <p>As the proposed development does not physically connect into the lands to the west and the future Jamestown Park to the north and given there is no existing development to connect into, in our opinion, no Letter of Consent from the adjoining landowners are required.</p>
9.	The applicant shall provide clarity as to the layout and functioning of the duplex units fronting the new road at site's southern boundary. Care should be taken to ensure that the entrances facing the new road function as the sole/primary accesses points to these units. The Built Form Objectives of SDF3 of the LAP refer to this matter.	All front door entrances now front the Kilternan Road to further promote active street frontage. Please refer to Appendix A of the <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for a response to this item.
<b>Documents to be Provided:</b>		
•	A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of open spaces within apartment buildings, landscaped areas, pathways, entrances, and boundary treatment/s. Particular regard should be had to	Please refer to the accompanying <i>Architectural and Urban Design Statement</i> prepared by MCORM Architecture and Urban Design for details.

	the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. All proposed material treatments should give particular consideration to the restoration and conservation of the two no.	
•	The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with the 'Design Standards for Apartments, Guidelines for Planning Authorities' (DoHLGH, 2025).	Please refer to the accompanying <i>Lifecycle and Management Report</i> prepared by MCORM Architecture and Urban Design and the <i>Operational Waste Management Plan</i> prepared by DNV for details.
•	A complete set of floor plans, elevations, including contiguous elevations, and long sections, in addition with verified views, preferably including winter views, that would assist in understanding the relationship between the proposed development and its context.	Please refer to the accompanying suite of drawings prepared by MCORM Architects and the <i>Verified Views and CGIs</i> prepared by 3D Design Bureau for details.
•	A Housing Quality Assessment which provides the specific information regarding the proposed residential units required by the Dun Laoghaire County Development Plan 2022-2028, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (DoHLGH, 2024), the 'Quality Housing for Sustainable Communities: Design Guidelines' (DoHLGH, 2007, 2020), and the 'Design Standards for Apartments, Guidelines for Planning Authorities'. The assessment should also demonstrate how the proposed dwellings and apartments comply with the various requirements of the Development Plan and the guidelines.	Please refer to the accompanying <i>Housing Quality Assessment</i> prepared by MCORM Architects for details.
•	A Building Lifecycle Report.	Please refer to the accompanying <i>Lifecycle and Management Report</i> prepared by MCORM Architects for details.

•	Details regarding the long-term management of both the apartment and housing development, and its communal facilities.	Please refer to the accompanying <i>Lifecycle and Management Report</i> prepared by MCORM Architects and the <i>Operational Waste Management Plan</i> prepared by DNV for details.
•	A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking (or lack thereof) provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.	Please refer to the accompanying <i>Traffic and Transport Assessment</i> and <i>Mobility Management Plan</i> prepared by Meinhardt for details.
•	A quantitative and qualitative assessment which provides a breakdown of the communal and public open space. The assessment shall detail the functionality of the public space and shall disregard any areas required for circulation space such as footpaths between buildings etc.	Please refer to Drawing No. 'COWLDN-MCORM-AR-XX-DR-P4-XX-1010' prepared by MCORM Architecture and Urban Design and the suite of landscape drawings and report prepared by NMP Landscape Architecture for details on the proposed public and communal open space provision.
•	Design of the proposed surface water management system including attenuation features and cross sections of all SuDS features proposed on site in the context of surface water management on the site, discharge rates equal to greenfield sites, integration of appropriate phased works.	Please refer to the suite of suite of civil engineering documents prepared by Roger Mullarkey & Associates for details.
•	Submission of a Taking in Charge Map.	Please refer to Drawing No. 'COWLDN-MCORM-AR-XX-DR-P4-XX-1008' prepared by MCORM Architecture and Urban Design for details.
•	Submission of a Construction Management Plan.	Please refer to the accompanying <i>Construction Management Plan</i> prepared by Meinhardt for details.
•	A letter from Irish Water confirming that there is sufficient capacity in the public infrastructure to facilitate a connection for the proposed development obtained no	Please refer to the accompanying <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates for details.

	more than 6 months before the date of lodgement of the LRD Application.	
•	<p>Information/documentation which address the appended assessments from the following internal departments (Appendix C):</p> <ul style="list-style-type: none"> <li>a. Drainage Planning;</li> <li>b. Transportation Planning;</li> <li>c. Public Lighting;</li> </ul>	Please refer to <i>Engineering Infrastructure Report &amp; Stormwater Impact Assessment</i> prepared by Roger Mullarkey & Associates for a response to each of the items raised by the Drainage Division. Please see below the responses to the Transportation and Public Lighting Section of DLRCC.

### 3.0 ADDITIONAL ITEMS NOTED/REQUESTED BY INTERNAL DEPARTMENTS

	Items to be Addressed	Response
	<b>Transportation Planning</b>	
	<p>With regard to the required quantity of cycle parking, provision shall be demonstrated as follows:</p> <ul style="list-style-type: none"> <li>• 1 No. long stay cycle parking space per bedroom.</li> <li>• 1 No. short stay cycle parking space per 5 No. units.</li> </ul> <p>Of these, a minimum of 1 short &amp; long stay cycle parking space per unit shall be the preferred "Sheffield" type, with the remainder provided to a design of the Applicant's choosing, subject to adequate positioning and passive surveillance across the site. If stacked over Sheffield cycle parking is proposed, a proportion of Sheffield cycle parking shall be provided with no overhead obstruction.</p> <p>In relation to cycle parking provision for dwelling houses, it is acceptable that bikes be brought through to the rear, where rear access is provided for long-term cycle parking.</p>	These cycle parking requirements have been provided. Please refer to the <i>Mobility Management Plan</i> prepared by Meinhardt for details.



Public Lighting		
	<p>Tree conflicts can be avoided if trees are placed in line with or behind any lighting and the area that is to be lit. Please note that trees block light and will be assessed as such when the lighting design is being analysed. Please place trees more than 3m from any lighting column.</p>	<p>Any conflicts regarding lighting column and tree planting locations have been resolved as demonstrated in the Landscape Masterplan prepared by NMP and the Lighting Report prepared by OCSC.</p>

#### 4.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in Dún Laoghaire–Rathdown County Council’s Opinion. We trust that this document fully responds to all of the points raised by Dún Laoghaire–Rathdown County Council in their Opinion and we submit that the proposed development represents the proper planning and sustainable development of this site.

Signed:

A handwritten signature in black ink that reads "Patricia Thornton". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Patricia Thornton Director  
Thornton O'Connor Town Planning