



Tyrrells Land, Stradbally Road,
Portlaoise, Co. Laois

Case reference: JP11.323606

Response to An Coimisiún Pleanála Comments

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Proposed Development of 67 No. Housing Units at Tyrrells Land, Stradbally Road, Portlaoise

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Prepared on behalf of Laois County Council

Date: 5th December 2025

1. Introduction

This formal response is submitted to An Coimisiún Pleanála (ACP) in respect of the prescribed body observations received under the Section 177AE process for the proposed development of 67 no. housing units at Tyrrells Land, Stradbally Road, Portlaoise.

This report:

1. Addresses all issues raised by:
 - **Transport Infrastructure Ireland (TII)**
 - **Inland Fisheries Ireland (IFI)**
 - **Development Applications Unit (DAU)**
 - **Bluett & O'Donoghue (BoD)** on behalf of neighbouring landowners
2. Demonstrates that the proposed development is appropriate, policy-compliant, environmentally robust and capable of being delivered without adverse impacts.
3. Sets out a clear, evidence-based justification for retaining the submitted layout.
4. Incorporates the findings of:
 - The Appropriate Assessment Report
 - Ecological Impact Assessment
 - Arboricultural Impact Assessment
 - Desktop Archaeological Assessment
 - Road Safety Audit
 - Traffic and Transport Assessment
 - Engineering design submission
5. Provides updated statements from the project engineers and ecological consultants.

The proposal represents a high-quality, DMURS-compliant residential neighbourhood on serviced, zoned lands, contributing significantly to housing delivery in Portlaoise.

2. Response to TII Submission

2.1 Summary of TII Issues

TII raised matters relating to:

- Access onto the N80
- Compliance with TII Publications
- Requirement for a Design Report under DN-GEO-03030
- Concern regarding possible prematurity

2.2 Response

1. Traffic and Transport Assessment (TTA) & Road Safety Audit (RSA)

A full Traffic and Transport Assessment (TTA) and Stage 1 Road Safety Audit (RSA), prepared by ORS, were included within the submitted planning documentation.

The project engineer confirms:

- The TTA and RSA do not explicitly reference every TII Standard cited in TII's submission.
- However, both assessments demonstrate:
 - Safe operation of the proposed junction
 - Adequate capacity in all scenarios
 - No strategic risk to the N80 network

2. Requirement for a Design Report (DN-GEO-03030)

TII note that a Design Report may be required for the new junction.

The project engineer confirms:

- A Design Report can be prepared as a planning condition, which is common for urban residential schemes interfacing with national secondary routes.
- Any refinements arising from the Design Report can be incorporated post-permission without altering the site layout.

3. Junction Design

The proposed junction:

- To clarify, the site is located within the town centre and lies within the urban 50 km/h zone not a 60km/h speed zone.
- Matches existing access patterns along this section of the N80
- Meets all relevant visibility and safety criteria
- Will be supported by a technical note confirming compliance with TII standards

4. No Prematurity

The engineer confirms:

- The TTA conclusions remain valid
- There is no conflict with strategic transport objectives
- No national route reservations affect the development
- Planning is not premature

Conclusion:

All TII issues have been resolved, and any remaining matters will be addressed via a standard condition requiring a post-planning Design Report.

If ACP requires, Laois County Council will submit further reports or clarifications.

3. Response to Inland Fisheries Ireland (IFI)

IFI's concerns relate to:

- Potential indirect impacts on the Triogue River.
- Construction-phase water quality risk.
- Stormwater management, silt control and SuDS performance.
- Cumulative impacts.

Response

1. Hydrological and surface water design complies with CIRIA SuDS Manual and LCC requirements.

The submitted civil engineering documentation provides:

- Attenuation sized for the 1:100 year + 20% climate change event.
- Full treatment train including permeable paving, swales and controlled discharge.
- Outfall designed to prevent hydromorphological impact.

2. Distance and separation from receiving waters

The development is set back significantly from the Triogue River, with no direct hydrological connection other than controlled drainage.

3. Construction-phase controls

A Construction Environmental Management Plan (CEMP) will include:

- Silt fencing, sediment traps, concrete washout controls
- Pollution prevention measures
- Strict buffer zones
- Emergency spill response procedures

IFI's submission includes 21 items relating to surface water management, hydrology, construction impacts, and ecological protection. The following provides a consolidated response incorporating the project engineer's input (HHP).

IFI Comment 1 – General Observation

Engineer Response: Noted.

IFI Comment 2 – Compensatory Flood Storage Area

IFI requested clarity on provision of compensatory storage.

Engineer Response:

HHP confirm that the compensatory storage area is clearly indicated on **Drawing C-002 PL5**, included within the planning submission.

IFI Comment 3 – Soakaways, Ponds & Infiltration Pathways

IFI note potential risks associated with infiltration-based SuDS.

Engineer Response:

No soakaways or infiltration ponds are proposed within the development.
Where SuDS / Nature-Based Solutions features are used, they can be fully lined where required to ensure containment and prevent groundwater mobilisation.

IFI Comment 4 – Revisions to NIS

IFI requested that the Natura Impact Statement reflect additional clarifications.

Engineer Response:

The NIS will be revised accordingly and resubmitted as part of the final ACP response.

IFI Comment 5 – Landscaping & Water Quality Protections

IFI note opportunities for mitigation through landscape finishes.

Engineer Response:

Elements of this may be addressed through the final landscaping plan, including buffer planting and surface water treatment measures.

IFI Comment 6 – Wastewater Capacity / Uisce Éireann

IFI requested confirmation of wastewater capacity availability.

Engineer Response:

A Confirmation of Feasibility has been issued by Uisce Éireann.
Any required network upgrades will be addressed at the connection application stage, as per standard UÉ procedures.

Laois County Council notes IFI concerns and will accept as necessary planning conditions.
LCC will also prepare a full CEMP and Commencement stage.

IFI Comment 7 – Construction Phase Pollution Management

IFI require a detailed construction-phase plan to manage water quality risk.

Engineer Response:

A full Construction Environmental Management Plan (CEMP) will be prepared by the appointed contractor.

IFI Comment 8 - 9 – General Note

Engineer Response: Noted.

IFI Comment 10 – Silt & Sediment Control Measures

Engineer Response:

To be fully addressed within the OCEMP, including silt fencing, sediment traps, and surface water protection measures.

IFI Comment 11 – Dust, Pollutants & Hazardous Materials

Engineer Response:

To be addressed within the OCEMP, including containment protocols, storage, and spill response procedures.

IFI Comment 12 – General Note

Engineer Response: Noted.

IFI Comment 13 – Attenuation & Discharge Rates

IFI emphasised the importance of greenfield runoff and attenuation.

Engineer Response:

The HHP drainage calculations already include:

- Full attenuation for the 1:100-year + 20% CC event
 - Discharge restricted to greenfield runoff rates
- Construction-phase controls for these systems will be included in the OCEMP.

IFI Comment 14 – Hydrocarbon Interceptors & Soak Pits

Engineer Response:

No soak pits are included.

Hydrocarbon interceptors are provided and are shown on Drawing C-020 PL5.

IFI Comments 15–21 – Remaining Construction-Phase Water Protection Measures

IFI outlined further measures related to:

- Watercourse protection
- Fuels & chemical storage
- Bunding
- Monitoring
- Emergency response

Engineer Response:

All items 15 through 21 will be fully addressed within the OCEMP, which will specify:

- Pollution prevention controls
- Spill protocols
- Site run-off management
- Surface water monitoring
- Contractor responsibilities

Summary (IFI)

The detailed engineering responses confirm that:

- The submitted drainage design is robust and compliant.
- No infiltration SuDS or soakaways are proposed.
- All construction-phase concerns will be addressed via an OCEMP.
- The NIS will be revised.
- Wastewater capacity is confirmed by UÉ.

The development therefore meets the requirements of IFI and aligns with CIRIA SuDS, LCC policy, and good hydrological practice.

Laois County Council will accept and address ACP's concerns regarding IFI's comments as conditions of planning.

4. Response to Development Applications Unit (DAU)

DAU's concerns relate to:

- Appropriate Assessment screening and ecological mitigation.
- Potential impacts on the pNHA (Portlaoise Esker).
- Bat foraging, tree removal and general biodiversity issues.
- Compliance with the Habitats Directive.

Response

1. Full NIS and Appropriate Assessment (AA) Screening already submitted

The AA Report concludes no likelihood of significant effects on any European Site. No hydrological connectivity exists to the SAC network.

2. Ecological Assessment (submitted separately) confirms:

- Habitats onsite are primarily of low ecological value.
- No bat roosts identified; only low to moderate foraging.
- Native trees to be retained where outlined.

3. Esker protection

- The development is located east of the core eskers, outside protected geological features.
- The site layout avoids significant earthworks adjacent to the elevated landform.

4. Mitigation commitments

- Native planting, lighting design to limit spill, bat-friendly spectrum options,
- Tree protection zones enforced during construction.

Conclusion:

There are no significant residual ecological impacts and the project complies with the Habitats Directive.

If ACP requires, Laois County Council will submit further reports or clarifications.

5. Response to Bluett & O'Donoghue Submission (Heritage / Layout Objections)

The BoD raise concerns regarding the protected structure (Portrane House), the Esker, trees, and the orientation of dwelling units.

The Arboricultural Impact Assessment, Tree Survey, and the Judith Hill Heritage Assessment provide clear evidence rebutting these concerns.

5.1 Setting of Portrane House

- The development respects the curtilage as defined in the Judith Hill baseline heritage report.
- The proposed units adjacent to Portrane House do not obscure principal elevations.
- Separation distances are fully compliant with CDP standards.
- The design approach appropriately fronts/publicly addresses the internal street network—not the protected structure—consistent with modern best practice in residential urban design and permeability.

BoD propose rotating units to face the protected structure; however:

- This would result in houses presenting gable ends and rear boundaries to the public street.
- It conflicts with permeability, passive surveillance and DMURS principles.
- It is not required by the Development Plan or Heritage Guidelines.
- It would materially compromise the overall urban design quality.

5.2 Boundary Treatment

The submitted scheme includes a high-quality boundary treatment fully consistent with DM HS 10 of the Laois County Development Plan. The suggestion of a 2m stone wall is optional, not required.

A 2m block wall with appropriate capped finish, landscape buffer, and native tree planting (already proposed) achieves:

- Protection of privacy
- Protection of visual amenity
- No adverse impact on heritage significance
- Compliance with LCC residential standards

5.3 Impact on pNHA / Esker

- No works occur within the Esker footprint.
- No excavation is proposed within tree root protection zones.
- The Esker is visually separated by existing vegetation and distance.
- The DAU and IFI have raised no substantial concern regarding direct impacts on the Esker.

5.4 Impact on Trees / RPAs

The arboricultural evidence clearly demonstrates:

- No loss of historically significant tree groups
- No adverse impact on the protected structure's setting
- No conflict between dwellings and tree protection zones
- No justification for layout reorientation or redesign

Removal of low-quality vegetation allows:

- Improved long-term landscape structure
- Reinforced ecological and visual buffers
- Enhanced setting of both the development and protected structure

The proposed development reflects good practice, protects meaningful trees, and enhances the long-term landscape character of the site.

5.5 Heritage & Landscape Character

The Judith Hill report confirms:

- The meaningful parts of the historic landscape relate to the front field and Esker ridge
- No historic avenue or designed tree feature exists within the development lands

There is no evidence supporting any requirement to alter the layout.

The proposed scheme protects heritage, enhances the landscape, and integrates sensitively with Portrane House.

This fully supports the retention of the submitted layout.

6.0 Response to Specific Heritage & Tree-Related Claims

6.1 Claim: “The scheme removes a historic tree belt and impacts the demesne landscape.”

Response:

The AIA confirms that the majority of trees in this area are Category C, self-seeded, or secondary growth.

There is no evidence of a historically intact tree belt forming part of the designed demesne associated with Portrane House.

The Judith Hill heritage report also reinforces that the more meaningful historic landscape elements lie:

- around the Front Field, and
- along the ridge,
not within the portion of the site where Category C trees exist.

The proposed layout retains all meaningful trees and vegetation that contribute to the setting.

6.2 Claim: “Tree removal will harm the setting of Portrane House and its attendant grounds.”

Response:

The trees proposed for removal are low-quality (Cat C) and do not meaningfully contribute to the special character or significance of the protected structure.

The Category B trees forming the valuable elements of the existing landscape are retained, safeguarded, and integrated into the boundary plantings and open space framework.

This protects the visual buffer between the development and Portrane House while maintaining a naturalised edge.

Moreover, removal of lower-quality trees allows for enhanced, structured replanting, delivering long-term landscape improvement that outperforms the existing ad-hoc tree resource.

6.3 Claim: “The proposed layout impacts the root protection zones of important trees.”

Response:

The planning submission’s site layout and the AIA demonstrate that:

- All RPAs of retained trees are fully protected
- The construction footprint avoids all encroachment into significant RPAs
- Protective fencing zones are clearly defined and achievable on-site
- The engineering design (final report pending from C&S engineer) will ensure no excavation or foundation impact within RPAs

There is no conflict between the retained trees and proposed buildings.

6.4 Claim: “The development should re-orient houses facing Portrane House due to tree/landscape impacts.”

Response:

The AIA and heritage baseline do not support this.

- The retained tree belt along the western boundary already provides visual filtering.
- There is no intact historic avenue or visual axis requiring protection.
- The Judith Hill report notes views FROM the ridge *toward* the house, not formal views from the house toward this site.

Reorienting houses would introduce unnecessary overlooking toward the protected structure and is not supported by the arboricultural or heritage evidence.

6.5 Claim: “The layout undermines the historic setting and landscape character.”

Response:

This assertion is not consistent with:

- The arboricultural evidence (low-quality trees, limited contribution)
- The heritage report (which identifies the meaningful setting as the ridge and front field)
- The submitted design statement (which provides mitigation, open space, and buffers)

The proposed development preserves all valuable trees, enhances the landscape, and avoids significant heritage impacts.

7. Conclusion

The submissions from TII, IFI, DAU and BoD have been fully reviewed and addressed. The assessments confirm:

- No significant hydrological or ecological impact
- No conflict with the Esker or protected geological features
- No adverse effect on the protected structure or its setting
- A safe, policy-compliant access arrangement
- Robust construction-phase protections
- A clear, defensible rationale for retaining the submitted layout

The development:

- Complies with the Laois County Development Plan
- Delivers much-needed social and affordable housing
- Maintains a high-quality urban design framework
- Respects heritage, landscape, and ecological sensitivities
- Responds comprehensively to all prescribed body submissions

Accordingly, it is submitted that the proposed development can proceed under Section 177AE and that approval should be granted.