

STRATEGIC HOUSING DEVELOPMENT
PLANNING APPLICATION
**RESPONSE TO AN BORD
PLEANALA OPINION**
FOR LANDS AT HOLLYSTOWN-KILMARTIN, DUBLIN 15

BSM

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**Brady Shipman
Martin**

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CLIENT
Glenveagh Homes Ltd.

DATE
December 2021

LANDS AT HOLLYSTOWN-KILMARTIN

Response to ABP Opinion

DOCUMENT CONTROL SHEET

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1 INTRODUCTION

This Response to An Bord Pleanála has been prepared in support of a SHD Planning Application to An Bord Pleanála, on behalf of Glenveagh Homes. The subject application site (hereafter called ‘the site’) is located in an existing and emerging urban area in the Hollystown / Kilmartin / Tyrrelstown area, in the north-west of the Dublin Metropolitan Area (DMA), in Dublin 15. For ease the application is referred to as Lands at Hollystown Kilmartin. It is a site area of c. 25.3 hectares with a developable area of c. 13.67 Ha.

This application relates to the amalgamation of two separate Strategic Housing Development Pre-Application Consultation Requests (Kilmartin Local Centre Ref: TC06F.309783 and Kilmartin Sites 2 & 3 Ref: TC06F.309926) to form a singular Strategic Housing Development Application.

As such, Brady Shipman Martin has prepared this Report in Response to the Opinions of An Bord Pleanála dated 3rd September 2021 (in respect of Kilmartin Local Centre Ref: TC06F.309783) and 6th September 2021 (in respect of Kilmartin Sites 2 & 3 Ref: TC06F.309926). This Response has been prepared under Article 285(5) (b) of the Planning and Development (Strategic Housing Development) Regulations 2017 in association with the Applicant and Design Team and also provides the specific information as requested by the Board.

In its Opinions, An Bord Pleanála concluded that:

In respect of Kilmartin Local Centre Ref: TC06F.309783 ‘An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development’.

In respect of Kilmartin Sites 2 & 3 Ref: TC06F.309926 ‘An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.’

2 KILMARTIN LOCAL CENTRE REF: TC06F.309783 OPINION

2.1 Specific Information Requested By An Bord Pleanála

In its Opinion of 3rd October 2021, ABP set out 19 No. items of specific information that should be enclosed with the application under Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017.

2.1.1 Site Connectivity & Accessibility

Item 1 of the ABP Opinion requests:

Seek to demonstrate how the proposed development ties in with the overall Tyrrellstown Area, with regard to delivery of pedestrian / cycle / vehicular accesses through the site, in particular, into the existing Tyrrellstown neighbourhood centre to the south, to the educational lands to the north west, to Bellingsmore to the north and to the Bus Stop to the east on the R121.

Response:

It is confirmed that a comprehensive response demonstrating how the proposed development ties in with the overall Tyrrellstown area through the provision of a network of cycle and pedestrian route ways, new and enhanced, both green networks and more urban networks of paths and routes, is set out in the following interlinked documentation:

- BSM Framework Plan for Hollystown Kilmartin
- BSLA Landscape Design Statements for both Sites 2&3 and Local Centre lands.
- Deady Gahan Architects Design Statement
- OMP Architects Design Statement.
- DBFL Traffic & Transport Assessment
- DBFL DMURS Design Statement.

It is further confirmed that the proposed development connectivity and linkages strategy meets the requirements of the Kilmartin LAP, establishing connectivity to future development lands, and to adjacent facilities and developments.

2.1.2 Bus Stop Potential

Item 2 of the ABP Opinion requests:

Further clarity on possibility of rerouting the Bus network and provision of a Bus Stop within any future proposal for the Local Centre. Details of discussion with National Transport Authority and other relevant bodies

Response:

Section 4.2 of the DBFL Traffic and Transport Assessment Report sets out details and considerations for rerouting of bus network through the Local Centre, and the potential for provision of a bus stop on the new Link Street being delivered.

2.1.3 Car Parking Quantum

Item 3 of the ABP Opinion requests:

Justification of the car parking quantum proposed.

Response:

Please see enclosed DBFL Traffic & Transport Assessment which clearly sets out the parking strategy proposed for this application, and justification for same. In addition, both the Planning Report and Material Contravention Statement prepared by BSM, set out the parking strategy and justification for same.

2.1.4 Material Contravention

Item 4 of the ABP Opinion requests:

A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the statutory Plan and LAP for the area 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.

Response:

Please see enclosed Material Contravention Statement, prepared by BSM, which forms part of this application documentation.

2.1.5 Land Ownership

Item 5 of the ABP Opinion requests:

Further clarification with respect to the area of culverted lands (hatched on the submitted site layout plan) within the ownership of FCC and lands to the east between the subject site and the R121 also within the ownership of FCC and how / if these lands are to be included or treated as part of any future application. Clear delineation of what lands are to be included within the red line boundary and appropriate consent for lands within FCC ownership included, if applicable, in any future application

Response:

Please see enclosed Letter of Consent from Fingal County Council, included as an Appendix to the Planning Application Form, in relation to the inclusion of lands in their ownership within the red line application boundary for this SHD application, which includes the area of culverted lands, referred to in the ABP Request above. These lands have been included in this application for development to facilitate access to public transport provision on the R121 adjacent to this site, in a convenient and efficient manner for residents and local community.

Lands to the east of the Local Centre lands to be developed, within the ownership of FCC, are also now included in the red line boundary of this application, and a landscape proposal is submitted for these lands which complements that proposed within the LC lands (Please see BSLA Landscape Design Statement submitted with this application documentation for further details).

2.1.6 Housing Quality Assessment

Item 6 of the ABP Opinion requests:

A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations 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 standards in terms of dual aspect and proportion of apartment which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.

Response:

Please see enclosed O'Mahony Pike Architects (OMP) Architecture Design Statement within which the Housing Quality Assessment (HQA) is included. This HQA sets out compliance with standards as per the Sustainable Urban Housing Design Standards for New Apartments (2020), and how these standards are exceeded in order to provide a range of quality residential units suitable to a broad community. Those units that exceed the floor area standards by 10% are highlighted in the HQA.

In addition, within this Design Statement, please see Appendix B on Dual Aspect Apartments, which colour code units according to their aspect, as requested. There are no north facing single aspect units proposed.

2.1.7 Response to FCC Opinion

Item 7 of the ABP Opinion requests:

Response to issues raised, in point 6.6.2 specifically, of the planning authority opinion, dated 26/04/2021 in particular, relation to the potential for unreasonable overlooking between habitable rooms in Blocks C and D. Also quantum of north facing single aspect apartments in Blocks C and H and justification for same.

Response:

It is noted that the particular blocks referred to in the ABP Request above and referred to in the FCC Opinion i.e. Blocks C and D, pertain to an area of the Local Centre which no longer forms part of this application. Therefore these blocks are excluded from this application.

As set out above, there are now no north facing single aspect units proposed in this development, as per the OMP Architects Design Statement, Appendix B. The particular block referenced in the ABP Response that lies within this application area i.e. Block H, as previously referenced, and now labelled as Block B, does not contain north facing single aspect units.

In relation to overlooking between habitable rooms, every effort has been made in the current proposal to implement appropriate separation distances in the context of good urban design parameters.

This is further set out in the OMP Architects Design Statement.

2.1.8 Open Space Provision

Item 8 of the ABP Opinion requests:

Justification of hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standard and location of underground attenuation tanks and storage systems under public open space, as part of SuDS solution. A response to the contribution suggested by the planning authority in accordance with Section 48(2) (c) of the Planning and Development Act 2000 in lieu of public open spaces provision.

Response:

This application for development meets and exceeds requirements for both communal and public open space.

Justification for the provision of the public open space is set out in the BSM Framework Plan for Hollystown Kilmartin which sets out open space provision in

the context of the wider landholding of Glenveagh Homes. It is further set out within the OMP Architects Design Statement and the BSLA Local Centre Landscape Design Statement.

Justification for the provision of communal open space is set out in the OMP Architects Design Statement and further detailed in the BSLA Local Centre Landscape Design Statement.

The DBFL Infrastructure Design Report sets out the SuDS solution for the application lands and its interface with open space. This is further detailed in the BSLA Local Centre Landscape Design Statement, as it pertains to the local centre lands.

2.1.9 Landscaping

Item 9 of the ABP Opinion states

Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted.

Response:

Please see enclosed with this application, the BSLA Local Centre Landscape Design Statement, which comprehensively responds to this issue raised. Furthermore the OMP Architecture Design Statement sets out the urban design rationale to the layout of the local centre lands in this application.

2.1.10 Daylight and Shadow Impact Assessment

Item 10 of the ABP Opinion states

A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to: (i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies. (ii) Impact to any neighbouring properties devoid of proposed and existing landscaping and trees.

Response:

Please see enclosed IN2 Daylight and Sunlight Analysis Report which comprehensively addresses the items raised by ABP, as per above.

2.1.11 Noise Impact Assessment

Item 11 of the ABP Opinion states

A Noise Impact Assessment of the proposed development, specifically with regard to location of the site within Noise Zone C associated with the airport and compliance with Objective DMS31 of the Fingal County Development Plan 2017.

Response:

Please see enclosed AWN Aircraft & Road Noise Impact Assessment Report submitted with this application documentation. This report responds to the issues raised at Item 11 above.

2.1.12 Visual Impact Assessment

Item 12 of the ABP Opinion states

A visual impact assessment. Long range views / photomontages of the proposed development from the surrounding area.

Response:

An Environmental Impact Assessment Report has been prepared for this application. A Visual Impact Assessment has been prepared and included within this EIAR documentation. Further, verified views / photomontages are included with the application documentation, incorporating long range views of the proposed development.

2.1.13 Planning Authority and Council Dept. Opinion

Item 13 of the ABP Opinion states

A response to matters raised within the PA Opinion and Appended County Council Department comments submitted to ABP on the 26th April 2021.

Response:

The suite of documents included in this application to ABP carefully responds to the matters raised in the FCC Opinion and County Council Department comments as issued in April 2021.

Additional engagement has taken place since the Pre-Application Consultation meeting with the Council departments in order to resolve and respond to any issues raised.

2.1.14 Council Departmental Opinions

Item 14 of the ABP Opinion states

Response to issues raised in the Water Services report dated 20th April 2021, the Transportation Department report dated 21st April 21, and the Parks and Green Infrastructure dated 21st April 2021 accompanying the PA Opinion submitted 26th April 2021.

Response:

A response to the issues raised in the Departmental Reports appended to the PA Opinion issued in April 2021 is provided in the Infrastructure Design Report, and the Traffic and Transport reports prepared by DBFL Engineers, in addition to the BSLA Landscape Design Statement for the Local Centre. Additional engagement has taken place since the Pre-Application Consultation meeting with the Drainage, Transportation, and Parks Departments on these matters.

2.1.15 Irish Water

Item 15 of the ABP Opinion states

Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission dated 22.04.2021.

Response:

Please see Statement of Design Acceptance from Irish Water, which is included in the planning application documentation. The proposed approach to drainage infrastructure is set out in the Infrastructure Design Report prepared by DBFL Consulting Engineers.

2.1.16 Building Lifecycle Report

Item 16 of the ABP Opinion states

A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2012). 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 high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Response:

Please see enclosed Building Lifecycle Report as prepared by Aramark, for the proposed development.

2.1.17 Childcare Assessment

Item 17 of the ABP Opinion states

Childcare demand analysis by way of assessment and report on demographic profile of the wider area, regard being had to public safety zone designation and including analysis of childcare capacity / services in the immediate area and the likely demand for childcare places resulting from the proposed development and development of lands to the north within the PSZ within the applicant's ownership.

Response:

Please see enclosed a comprehensive Schools Demand and Childcare Assessment Report prepared by BSM which sets out the school and childcare requirements of this proposed development and of potential future development on lands to the north and within the applicant's ownership.

This proposed development seeks to provide childcare facilities which cater to this current proposed development and to future potential development within the applicant's ownership cognisant of the Airport Public Safety Zone limitations on the siting of childcare facilities. The Local Centre lands is the preferred location for the siting of childcare facilities, adjacent to existing educational and community facilities and proximate to open space, public transport, and retail services.

2.1.18 Taken In Charge

Item 18 of the ABP Opinion states

A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

Response:

Please see enclosed Taking in Charge Drawing '19072C-OMP-00-SP-DR-A-1010 Site Plan- Area Taken In Charge' prepared by O'Mahony Pike Architects, in respect of the Local Centre lands.

2.1.19 Construction and Demolition Waste Management Plan.

Item 19 of the ABP Opinion states

Site Specific Construction and Demolition Waste Management Plan.

Response:

A full EIAR has been prepared for this proposed development. Appended to this EIAR is an Outline Resource and Construction Waste Management Plan, prepared by Byrne Environmental Consultants. In addition, a Construction & Environmental Management Plan prepared by DBFL is enclosed with the application documentation.

3 KILMARTIN SITES 2 & 3 REF: TC06F.309926 OPINION

In its Opinion of 6th October 2021, ABP set out 2 issues which required further consideration and amendment and 16 No. items of specific information that should be enclosed with the application under Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017.

3.1 Issues Requiring Further Consideration and Amendment

3.1.1 Courtyard House Typology

Item 1 of the ABP Opinion states:

Further justification/consideration and/or design modifications of the proposed courtyard house typology which, it is stated, seek to create dual frontage houses to the public realm either side of the subject house. The applicant should seek to satisfy the Board that such housing can operate as dual frontages over the lifetime of those dwellings. Consideration should be given to, inter alia, implications of certain 'exempted development' allowed for under the Planning and Development Act and associated Regulations behind the front building line and to the rear of houses and the implications that such exemptions (if applied) could have to the design strategy/intent of these dual frontage houses. The prospective applicant may wish to submit at application stage examples of such typologies that have been successfully implemented. The prospective applicant should also seek to demonstrate that this typology complies with statutory plan requirements (see specific information request item 3 below).

Response:

Please see enclosed Deady Gahan Architects Design Statement for Sites 2&3, including detail on Deady Gahan residential units and the Proctor & Matthews residential units. This Statement also sets out the urban design rationale for the layout of the proposed development in Sites 2&3, the incorporation of the

courtyard house typology and its role as a dual frontage unit at key locations, responding to key site conditions and characteristics. The detail provided sets out the residential amenity and quality of accommodation proposed, and the flexible nature of the units.

Should An Bord Pleanála have any residual concerns that what might normally be exempted development in respect of a housing unit may impact the unique design of these units, it is open to An Bord Pleanála to place a condition restricting any amendments subject to a further grant of planning. It should be noted that this typology has been permitted by Fingal County Council on Site 1 lands adjacent.

Additionally, see enclosed Proctor & Matthews Architects' Flexibility, Adaptability, and Arrangement Home Owner Manual which sets out Lifetime and Lifestyle Adaptability of the courtyard house typologies proposed. It further sets out some examples of where such examples have been successfully implemented.

In relation to compliance with statutory requirements, please see enclosed Deady Gahan Architects Housing Quality Assessment Report for Sites 2&3 units, including Deady Gahan residential units and the Proctor & Matthews residential units, setting out in detail how the units meet all standards.

3.1.2 Development and Phasing Strategy

Item 2 of the ABP Opinion states:

Development and Phasing Strategy - The documentation at application stage requires further justification with regards to:

- i. how the subject application forms part of a wider development strategy for the landholding*
- ii. how the childcare requirement to serve this development will be provided in tandem with housing. Given the Public Safety Zone (PSZ) and Noise Safety Zone (NSZ) designations associated with the airport and restrictions on provision of Childcare facilities with Noise Zone B and Dublin Airport Outer Public Safety.*

Response:

(i) The BSM Framework Plan for Hollystown Kilmartin enclosed with the application documentation clearly sets out the wider strategy for the subject lands within a wider planning context and within the wider Glenveagh Homes land ownership.

(ii) Please see enclosed a comprehensive Schools Demand and Childcare Assessment Report prepared by BSM which sets out the school and childcare requirements of this proposed development and of potential future development on lands to the north and within the applicant's ownership.

This proposed development seeks to provide childcare facilities which cater to this current proposed development and to future potential development within the applicant's ownership cognisant of the Airport Public Safety Zone limitations on the siting of childcare facilities. The Local Centre lands is the preferred location for the siting of childcare facilities, adjacent to existing educational and community facilities and proximate to open space, public transport, and retail services. It will be provided in tandem with residential delivery as per the phasing strategy outlined in the BSM Framework Plan for Hollystown Kilmartin.

3.2 Specific Information Requested By An Bord Pleanála

3.2.1 Site Connectivity & Accessibility

Item 1 of the ABP Opinion states:

A detailed statement demonstrating how the proposed development ties in with wider development strategy for the landholding and the overall Tyrrellstown Area, with regard to delivery of public open space, connectivity, way finding, pedestrian / cycle / vehicular accesses through the site, in particular, into the existing Bellingsmore development to the south, to the recently granted planning permission under FW21A/0042 to the east, to the designated GAA playing pitches to the north and to the adjoining educational lands to the south.

Response:

It is confirmed that a comprehensive response demonstrating how the proposed development ties in with the overall Tyrrellstown area, the adjacent Bellingsmore and newly permitted Site 1 residential development, through the provision of a network of cycle and pedestrian route ways, new and enhanced, both green networks and more urban networks of paths and routes, is set out in the following interlinked documentation:

- BSM Framework Plan for Hollystown Kilmartin.
- BSLA Landscape Design Statements for both Sites 2&3 and Local Centre lands.
- Dedy Gahan Architects Design Statement.
- OMP Architects Design Statement.
- DBFL Traffic & Transport Assessment.
- DBFL DMURS Design Statement.

It is further confirmed that the proposed development connectivity and linkages strategy meets the requirements of the Kilmartin LAP, establishing connectivity to future development lands, and to adjacent facilities and developments.

3.2.2 Cross Sections with Adjacent Developments

Item 2 of the ABP Opinion states:

Detailed cross sections demonstrating the relationship with Bellingsmore to the south, the permitted development under FW21A/0042 and any future proposed development.

Response:

Please see enclosed the drawings 'Proposed Site Sections AA-EE' prepared by Deady Gahan (contained within the Site 2&3 Drawing Pack) which indicate wider site sections which include Bellingsmore to the south of Sites 2 & 3, the permitted development under FW21A/0042 and Hollywoodrath to the east.

3.2.3 Housing Typology

Item 3 of the ABP Opinion states:

Clarity that all housing typology proposed comply with Development Plan Standards in relation to accommodation size, garden size, car parking and separation distances and where not that it is clearly set out and justified. Regard should be had to, inter alia, Objective DMS 24, Objective PM37 Objective PM38 Objective PM41.

Response:

Please see enclosed Deady Gahan Architects Housing Quality Assessment Report for Sites 2&3 units, including Deady Gahan residential units and the Proctor & Matthews residential units.

Additionally, see enclosed Proctor & Matthews Architects' Flexibility, Adaptability, and Arrangement Home Owner Manual which sets out Lifetime and Lifestyle Adaptability of the units proposed.

3.2.4 GAA Pitches

Item 4 of the ABP Opinion states:

Clarity of compliance with Local Objective 72, the requirement for delivery of 2.5 ha of lands for GAA pitches.

Response:

A comprehensive response to the proposed approach to compliance with Local Objective 72 is set out in the BSM documents – Planning Report, and Material Contravention Statement, in addition to the BSM Framework Plan for Hollystown Kilmartin enclosed herewith.

3.2.5 Material Contravention

Item 5 of the ABP Opinion requests:

A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the statutory Plan and LAP for the area 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.

Response:

Please see enclosed Material Contravention Statement, prepared by BSM, which forms part of this application documentation.

3.2.6 Open Space Provision

Item 6 of the ABP Opinion requests:

Justification of hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standard and location of underground attenuation tanks and storage systems under public open space, as part of SuDS solution. A response to the contribution suggested by the planning authority in accordance with Section 48(2) (c) of the Planning and Development Act 2000 in lieu of public open spaces provision.

Response:

This application for development meets and exceeds requirements for both communal and public open space.

Justification for the provision of the public open space is set out in the BSM Framework Plan for Hollystown Kilmartin which sets out open space provision in the context of the wider landholding of Glenveagh Homes. It is further set out within the Deady Gahan Architects Design Statement and the BSLA Sites 2&3 Landscape Design Statement.

Justification for the provision of communal open space is set out in the Deady Gahan Architects Design Statement and further detailed in the BSLA Sites 2&3 Landscape Design Statement.

The DBFL Infrastructure Design Report sets out the SuDS solution for the application lands and its interface with open space. This is further detailed in the BSLA Sites 2&3 Landscape Design Statement, as it pertains to these lands.

3.2.7 Landscaping

Item 7 of the ABP Opinion states

Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted.

Response:

Please see enclosed with this application, the BSLA Sites 2&3 Landscape Design Statement, which comprehensively responds to this issue raised. Furthermore the Deady Gahan Architecture Design Statement sets out the urban design rationale to the layout of the Sites 2&3 lands in this application.

3.2.8 Daylight and Shadow Impact Assessment

Item 8 of the ABP Opinion states

A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to: (i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies. (ii) Impact to any neighbouring properties devoid of proposed and existing landscaping and trees.

Response:

Please see enclosed IN2 Daylight and Sunlight Analysis Report which comprehensively addresses the items raised by ABP, as per above.

3.2.9 Noise Impact Assessment

Item 9 of the ABP Opinion states

A Noise Impact Assessment of the proposed development, specifically with regard to location of the site within Noise Zone C associated with the airport and compliance with Objective DMS31 of the Fingal County Development Plan 2017.

Response:

Please see enclosed AWN Aircraft & Road Noise Impact Assessment Report submitted with this application documentation. This report responds to the issues raised above.

3.2.10 Visual Impact Assessment

Item 10 of the ABP Opinion states

A visual impact assessment. Long range views / photomontages of the proposed development from the surrounding area.

Response:

An Environmental Impact Assessment Report has been prepared for this application. A Visual Impact Assessment has been prepared and included within this EIAR documentation. Further, verified views / photomontages are included in this EIAR, incorporating long range views of the proposed development.

3.2.11 Planning Authority and Council Dept. Opinion

Item 11 of the ABP Opinion states

A response to matters raised within the PA Opinion and Appended County Council Department comments submitted to ABP on the 21st May 2021.

Response:

The suite of documents included in this application to ABP carefully responds to the matters raised in the FCC Opinion and County Council Department comments as issued in May 2021.

Additional engagement has taken place since the Pre-Application Consultation meeting with the Council departments in order to resolve and respond to any issues raised.

3.2.12 Council Departmental Opinions

Item 12 of the ABP Opinion states

Response to issues raised in the Water Services report dated 12th May 2021, the Transportation Department report dated 13th May 2021, the Environmental Health and Noise Report dated 30th April 2021 and the Parks and Green Infrastructure dated 14th May 2021 accompanying the PA Opinion submitted 21st May 2021.

Response:

A response to the issues raised in the Departmental Reports appended to the PA Opinion issued, is provided in the Infrastructure Design Report, and the Traffic and Transport reports prepared by DBFL Engineers, in addition to the BSLA Landscape Design Statement for the Local Centre, and the AWN Aircraft & Road Noise Impact Assessment Report. Additional engagement has taken place since

the Pre-Application Consultation meeting with the Drainage, Transportation, and Parks Departments on these matters.

3.2.13 Irish Water

Item 13 of the ABP Opinion states

Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission dated 13th May 2021.

Response:

Please see Statement of Design Acceptance from Irish Water, which is included in the planning application documentation. The proposed approach to drainage infrastructure is set out in the Infrastructure Design Report prepared by DBFL Consulting Engineers.

3.2.14 Building Lifecycle Report

Item 14 of the ABP Opinion states

A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2012). 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 high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Response:

Please see enclosed Building Lifecycle Report as prepared by Aramark, for the proposed development.

3.2.15 Taken In Charge

Item 15 of the ABP Opinion states

A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

Response:

Please see enclosed 'Drawing 0014A-Taken In Charge-Part A' and 'Drawing 0014B-Taken In Charge-Part B' prepared by Deady Gahan which indicates the lands within Sites 2 & 3 proposed to be Taken In Charge by Fingal County Council.

3.2.16 Construction and Demolition Waste Management Plan.

Item 16 of the ABP Opinion states

Site Specific Construction and Demolition Waste Management Plan.

Response:

A full EIAR has been prepared for this proposed development. Appended to this EIAR is an Outline Resource and Construction Waste Management Plan, prepared by Byrne Environmental Consultants. In addition, a Construction & Environmental Management Plan prepared by DBFL is enclosed with the application documentation.

4 CONCLUSION

The Response set out herein outlines that the specific items requested by An Bord Pleanála to be further considered/amended and contained within an SHD Application for development at Hollystown Kilmartin, Dublin 15, have been both considered and included.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the proposal should be permitted by An Bord Pleanála.