

**Statement of Response to An Bord Pleanála's Opinion  
in relation to Reg. Ref.: ABP- 308478 -20**

*In respect of*

**A Proposed Strategic Housing Development**

*at*

**Hacketstown, in the Townland of Milverton and  
Hacketstown, Skerries, Co. Dublin.**

*Prepared for*

**Land Development Agency**

*Prepared by*

**John Spain Associates**

**April 2022**



39 Fitzwilliam Place, Dublin 2  
Telephone: (01) 662 5803  
E-mail [info@johnspainassociates.com](mailto:info@johnspainassociates.com)

**DOCUMENT CONTROL SHEET**

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## 1.0 INTRODUCTION

- 1.1. On behalf of the applicant, Land Development Agency, 2nd Floor Ashford House Tara Street Dublin 2, we hereby submit this Statement of Response report which seeks to address the issues raised within the Opinion of An Bord Pleanála, issued following pre-application consultation in respect of the proposed development. The Opinion of the Board was issued on the 26th January 2020.
- 1.2. This Statement will refer to other documentation which forms part of the final planning application pack, where more detailed and specific responses are provided to the issues dealt within this Statement by the relevant experts / design team members and consultants.
- 1.3. This Statement demonstrates that the issues raised in the Board's Opinion have been fully and satisfactorily responded to in the Strategic Housing Development planning application.

## 2.0 RESPONSE TO AN BORD PLEANÁLA OPINION

- 2.1. The Opinion of An Bord Pleanála on the pre-application stage for the proposed development noted that "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."
- 2.2. The Opinion set out 14 no. items of specific information that should be submitted with any SHD planning application. The following sections of this report set out these specific items and summarises how these items have been addressed in the final application.

### ITEM 1 – Site Ownership

- 2.3. The first item of specific further information relates to the height and design strategy for the proposed development. This item of the Board's Opinion was is as follows:

*Clarity should be provided of the site ownership and any works to take place outside of the site ownership extent. As part of this, a layout map and written documentation is required, with any necessary letters of consent and heads of agreement for phasing works to ensure integration with adjoining works (in particular the provision of roads, SUDs, or Open space along the Riparian Strip), to also be provided. If areas of road are proposed on Open Space Zoning, compliance with the zoning objective should be considered.*

### Response to Item 1

- 2.4. A Site Ownership Map and Phasing Diagram has been prepared and is enclosed with the application.
- 2.5. The application also includes Letters of Consent from Fingal County Council and the Housing Agency as Appendices to the Application Form.
- 2.6. For clarity the LDA can confirm to the Board that it intends to deliver all advance infrastructure works encompassed within the Fingal County Council grant of planning ( Planning Ref. No. F21A/0287 ) that is currently under appeal with An Bord Pleanála ( Ref. ABP-312189-21 ). The extent of these works covers lands in both the ownership of the Land Development Agency/Housing Agency and Noonan Construction, and includes, but not limited to; the provision of roads, SUD's measures and Open Space along the Riparian Strip. Please see attached letter of support from Noonan

Construction which confirms their agreement to the LDA undertaking these works on behalf of both parties.

- 2.7. The LDA further wishes to confirm all of the hard infrastructure contained within this advance infrastructure works application will be completed in advance of the occupation of any housing unit which may be permitted under this SHD application, with the only remaining work to be completed in conjunction with the completion of Phase 2 of the SHD application is the landscaping and planting of the areas effected by the temporary haul roads during construction.

## **ITEM 2 – EIAR**

- 2.8. The second item of specific further information relates to the EIAR Screening for the proposed development. This item of the Board's Opinion was is as follows:

*“EIAR screening should consider the level of integration and collaboration with adjoining existing, permitted and proposed developments adjacent to the site.”*

### **Response to Item 2**

- 2.9. An Environmental Impact Assessment Report has been prepared and is included with the Application. Section 1.4 details the rationale for inclusion, stating:

*“This application comprises residential development of 344 No. units and is preceded by 2 No. separate applications one for advance infrastructure (FCC Reg. Ref. F21A/0287; ABP-312189-21) in order to facilitate future residential development on lands to the north and south of the subject site and for road improvements (ABP Reg. Ref. 309409; FCC Reg. Ref. F20A/0324) in the area. The purpose of this development is to deliver residential development on the LDA lands. The area of the application site is 8.2 ha in size. Considering the close proximity of the Noonan Construction Phase 2 landholding to the north, which is 2.97 (nett) ha. in size which will facilitate approximately 149 no. residential units and given the integrated nature of the proposed development with the planned residential developments on the adjoining lands, which has been the subject of SHD Pre-Applications to ABP, the proposed development in combination with the development of the immediate lands to the north would exceed this threshold as such an EIAR is required.*

*Therefore, notwithstanding the fact that the subject site area and unit numbers are below the EIAR threshold, having regard to the level of inter-connectivity with adjoining proposed developments, and having regard to the precautionary principle, an EIAR has been prepared to accompany the subject application, having regard to the overall combined size of the site and to category 10(b)(i) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 as amended this Environmental Impact Assessment Report (EIAR) has been prepared with the planning application.”*

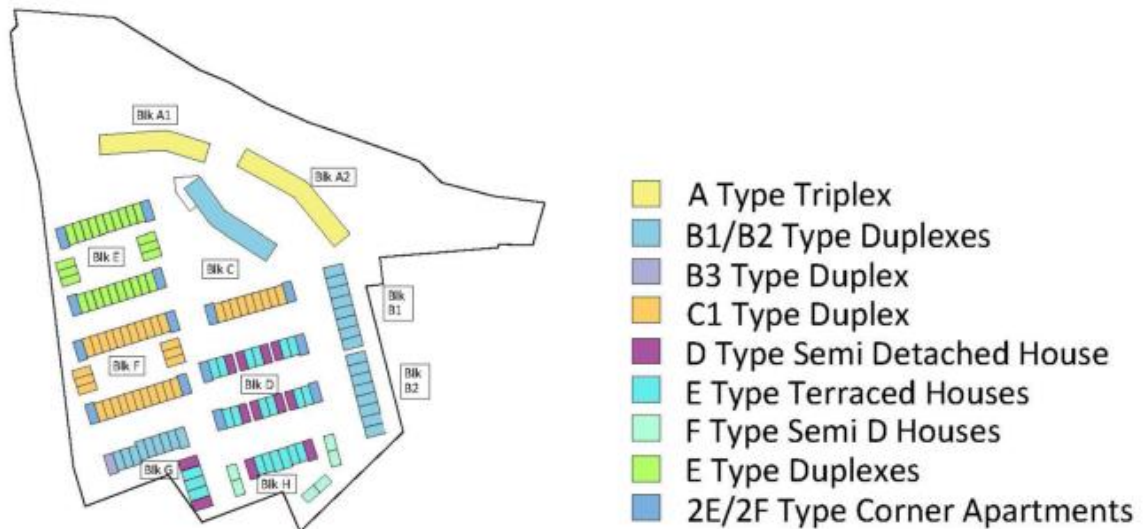
## **ITEM 3 – Unit Typology**

- 2.10. The third item of specific further information relates to unit typology for the proposed development. This item of the Board's Opinion was is as follows:

*The approach to unit typology should be explained further, with detail of how units will be appropriately designed for, and accessible to, a wide variety of different occupiers (i.e. mobility constrained / elderly / families). With particular regard to the checklist under chapter 4 of the Sustainable Residential Development in Urban Areas Guidelines, which ask how the development will ensure accessibility for everyone, including people with disabilities.*

### **Response to Item 3**

- 2.11. The rationale for Unit typology has been detailed in OMP's Design Statement and associated drawings. This Design statement clearly sets out how the proposed development will provide a variety of unit types to serve the growing community. The scheme primarily consists of 306 no. apartments and 39 no. houses. Apartment types include 1 and 2 bed apartments and 2 and 3bed duplex units. Each of the proposed apartments/duplexes are consistent with the relevant standards set out in the Apartment Guidelines. 3bed Houses are also provided and integrated with the proposed layout and streetscape. Overall there are 22 no. typologies across the scheme providing variety and a cradle to grave sustainable development.



- 2.12. The proposed development primarily consists of apartment units with 305 no. units of the total 345 no. units being apartments/duplexes. Please see below detailed breakdown of the proposed apartment/duplexes:

- 84 no. 1-bed apartments
- 66 no. 2-bed apartments
- 27 no. 2-bed duplexes
- 128 no. 3-bed duplexes
- 39 no. 3 - bed houses

- 2.13. Apartments include duplex and triplex units. Each of the proposed apartments/duplexes are consistent with the relevant standards set out in the Apartment Guidelines.

- 2.14. 39 no. 3-bed houses are proposed to the south of the subject site. These houses are set out in 3 no. house types:

- House Type A (Semi-detached 115 sqm)
- House Type B (Mid-terraced 115 sqm)
- House Type C (Semi-detached 115 sqm)

#### ITEM 4 – Landscape Proposals

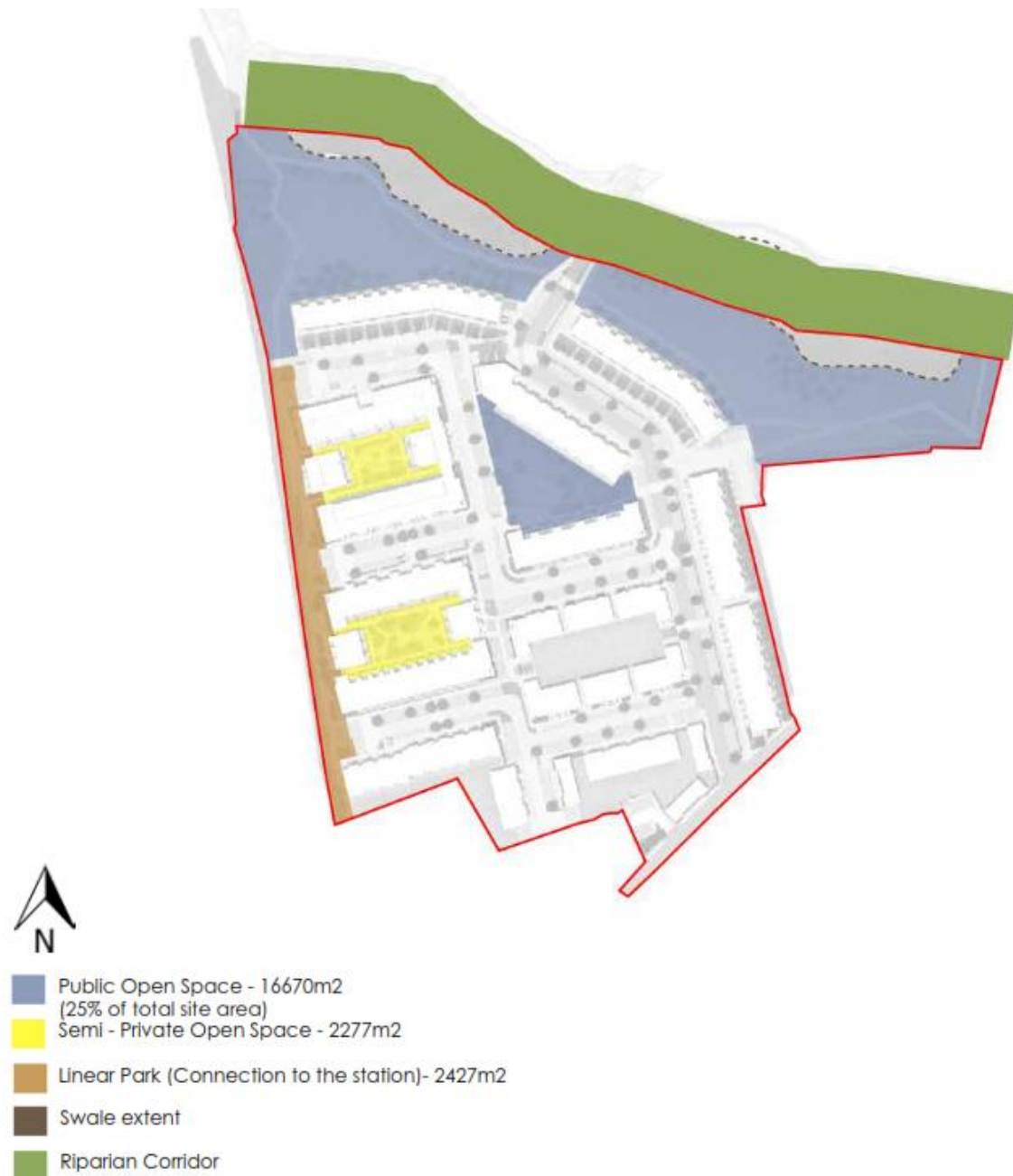
- 2.15. The fourth item of specific further information relates to the landscape strategy for the proposed development. This item of the Board's Opinion was is as follows:

*A plan of landscape proposals clearly delineating public, communal and private spaces to be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children should be provided.*

*Details of how the edge of the parkland area will be treated where it meets streets should be provided. The design treatment and enclosure of communal residential gardens should also be explained. A response to the comments from the Planning Authority in relation to the landscape proposals is required.*

#### **Response to Item 4**

- 2.16. The landscape design rationale has been set out in BSLA Landscape Design Statement and associated drawings. A clear delineation between public, communal and private spaces are set out in DWG No. DN1906\_BSLA\_LDA\_SHD\_Landscape Detail - Open Space. Figure 2.1 below illustrates this.
- 2.17. The proposed Public Open Space which is 16,670 sqm in size, the proposed communal open space is 2,272. The landscape design aims to utilise the existing contours in order to cater for a natural water run-off that supply the main water attenuation areas and enhance the vibe of the landscape by their presence. These areas will be planted and presented as areas that will attract insects. Gradual and attractive slopes designed to provide a useable space can be used for both habitats and as informal amenity. The approach has been coordinated with the adjacent Noonan Construction site which encourages clear landscape connections and mutual visual links as it ensures that a functioning and offering rich in amenity can be maximised to benefit both sides.



**Figure 2.1: diagram of public open space, communal space and other areas. (Source: BSLA, 2022).**

- 2.18. The intention of the public square at the centre of the scheme is to provide a place of common use and integration for all future residents as it acts as the heart of development. High quality landscaping proposals are proposed with mixture of soft and hard surfaces, to provide opportunities for play and relaxation. All spaces are well overlooked and have good orientation. In addition to the communal spaces, all apartment units also have their own dedicated balcony/ terrace equal to, or in excess of, the private open space standards set out in the Apartment Guidelines and 85.4 % are dual aspect.
- 2.19. As set out in BSLA drawing DN1906\_BSLA\_LDA\_SHD\_Landscape Detail - Play Provision all units are within 150m of the central public open space or the public open space to the north.
- 2.20. The play area is located centrally within the square, suitably distanced from the houses while being overlooked by them. Play area provides equipment for all ages and is

surrounded by a generous kickabout area. Planting proposed within the development will be in line with National Pollinators Guide for wildlife.

- 2.21. The intention of the public square at the centre of the scheme is to provide a place of common use and integration for all future residents as it acts as the heart of development. The play area is located centrally within the square, suitably distanced from the houses while being overlooked by them. Play area provides equipment for all ages and is surrounded by a generous kickabout area. Planting proposed within the development will be in line with National Pollinators Guide for wildlife.
- 2.22. The northern portion of the development is the primary entrance to the scheme and has been designed to serve a number of functions, including catering for the demands of a vibrant new community and integrating with the existing built fabric. The townhouse units at this location have been carefully developed to provide greater density and variety, in response to the challenging topography and to create a new street at the heart of the scheme which will become the arrival point. Through the creation of this new street they also form a definitive edge to the park and eco corridor north of the proposed development. The four story elements (Blocks A1/A2) at this location are the tallest volumes onsite. All units are dual aspect and will benefit from excellent views across the shared park space to the north and eastward to the sea. Due to the topography these terraces are not imposing and sit naturally within the rolling landscape as evidenced by the sections. These terraces will have a three storey presence to the street.
- 2.23. As set out in BSLA's Design Statement:

*"Interfaces and boundaries between public and private spaces have been carefully considered throughout this development. Where possible landscape proposal includes planted buffers facing on to the public pathways giving the residents sense of privacy and identity. In several places along the linear park, houses facing out to the west get a feeling of 'living in the park' with greenery at their front door."*

### **Shared Gardens**

- 2.24. There are two communal courtyards proposed between Block E and Block F 2,272 sqm in size. A large shared garden is created by the buildings here which offers a retreat to residents from the public open spaces and an extension of their private domain which will become nodes of activity within the community as it evolves.
- 2.25. Both courtyards are designed to have a similar character with the exception that courtyard in Block E is on podium and this requires a sensitive approach. The offering here is a planted courtyard, with plenty of seating, informal play, adult exercise stations and some communal furniture. The design aims to retain a degree of openness as well as privacy. In Block E Planting such as grasses and herbaceous perennials will add texture, depth and form to the space while also being a tool in creating privacy. Seven tree boxes are proposed on top of the columns in podium in order to accommodate tree planting. Proposed trees include light, ornamental species such as Magnolia or Amelanchier. In Block F, there is more opportunity in creating a lush green spaces as we propose more various trees both in their character as well as size. Minimalistic and natural play elements such as stepping stone are meandering through vegetation providing a sense of adventure and giving it an informal character. A portion of grass is retained for kick-about area, picnics, etc
- 2.26. All units are provided with a private amenity space which exceeds the national standards while the large shared gardens are only accessible via the semi-private entrances to the courtyards. These provide a sense of ownership and security to residents of the courtyards that is rarely found in contemporary high-density



communities. They offer excellent passive surveillance and include own door access throughout. The nature of these spaces is further explained within the Landscape report prepared by BSLA.

- 2.27. A response to the comments from the Planning Authority are included within the Landscape Design Statement prepared by BSLA.

### **ITEM 5 – Topographical Survey**

- 2.28. The fifth item of specific further information relates to the topographical survey of the site and its implication of the design strategy for the proposed development. This item of the Board's Opinion was as follows:

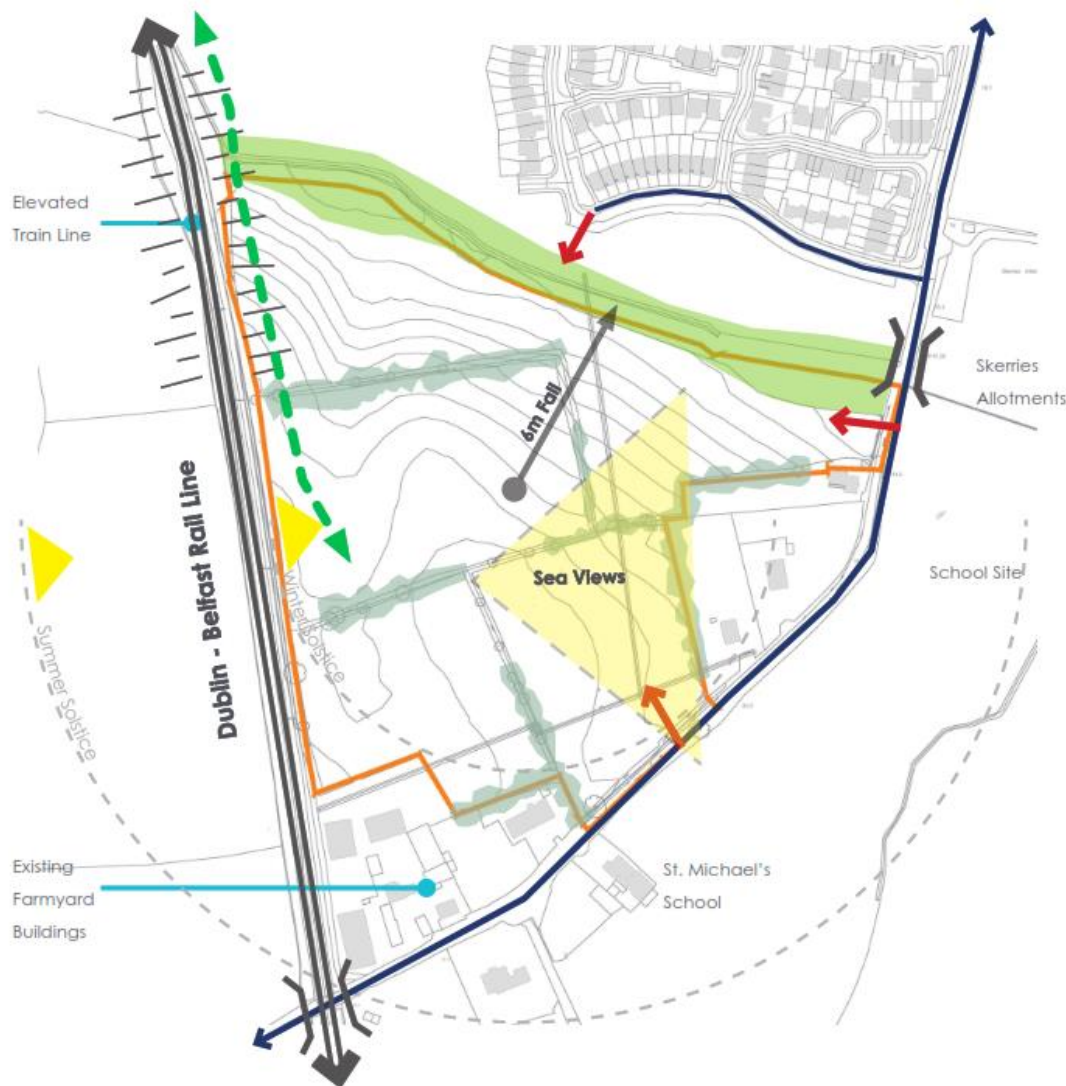
*Topographical survey of the site and associated commentary on how this has impacted the design of the proposed development and arrangement of open space.*

### **Response to Item 5**

- 2.29. A topographical survey has been carried out has informed the overall design and layout of the proposed development. OMP's Design Statement sets out the site context and response to the site which states:

*"A further constraint is the topography of the lands which fall circa 16m from the southern entrance off the Golf links Road towards the north and the stream. Additionally, the final third of the site sharply falls circa 6m with a 1:4 fall, creating a dividing 'ridge' between the plateau to the south and the basin to the north.*

*The character of the lands has a significant impact on our response to the site layout solution for the lands. The considerable fall impacts the location and access of dwellings, the typology and buildability of forms and at the same time, will provide a unique setting for a focused public realm."*



**Figure 2.2: diagram of site constraints. (Source: OMP, 2022).**

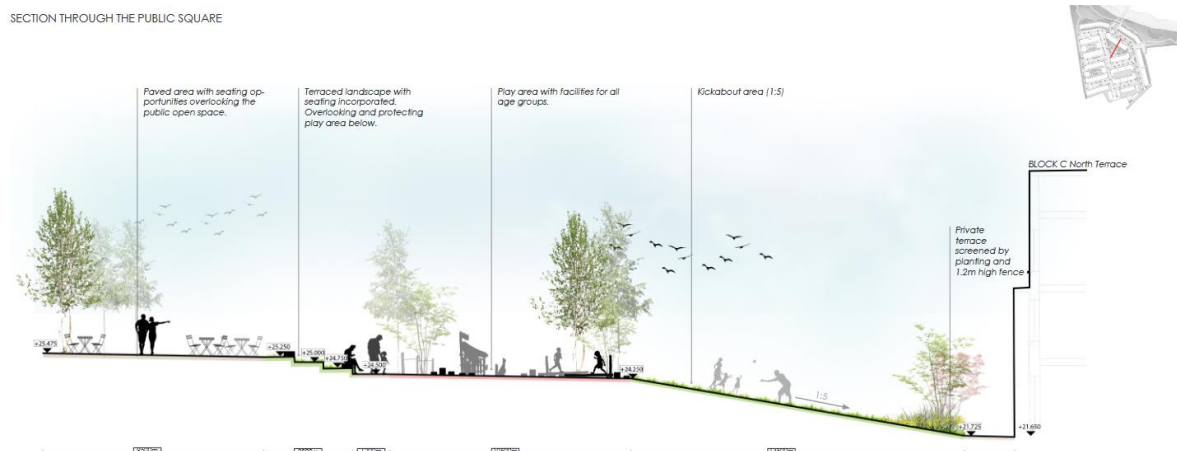
- 2.30. In turn BSLA's Landscape Design Statement and associated drawings sets out response to the site's existing context and topography. The Main level difference has been focused in the north of the site where the slopes have been manipulated in order to provide suitable space for amenities while also integrating wildlife and biodiversity.
- 2.31. The adjoining developer to the north has agreed a joint approach with the LDA, to landscape and attenuation infrastructure is a considerable benefit over tackling each site individually. This means future residents will benefit from access to more generous public open space, with scope for gently sloped meadows crisscrossed by mown paths and flanked with mature trees.
- 2.32. The attenuation areas are graded beyond where they are strictly required for the engineering calculations of capacity but offer contours that are pleasing and expansive rather than steeply dipping.
- 2.33. The positioning of key landscape elements such as pathways, feature areas, playgrounds and MUGA's are divided between the two based on topography and a site constraint and so cannot be artificially located in one or the other. Landscape, by its nature does not stop and start at a planning boundary so the consideration of "wholeness" here is stressed.
- 2.34. Further in relation to the Parkland character area:

*“The landscape design aims to utilise the existing contours in order to cater for a natural water run-off that supply the main water attenuation areas and enhance the vibe of the landscape by their presence....*

*Gradual and attractive slopes designed to provide a usable space can be used for both habitats and as informal amenity. Wetland and meadow typologies surrounding the mown grass zones will enhance biodiversity and allows closer interaction between humans and the natural world.”*



**Figure 2.3: Parkland Plan (Source: BSLA, 2022).**



**Figure 2.4: Section through public Square (Source: BSLA, 2022).**

## ITEM 6 – Duplex Units

- 2.35. The sixth item of specific further information relates to the Duplex Units for the proposed development. This item of the Board’s Opinion was is as follows:

*Additional detail of the access points to duplex units and how the design of duplex blocks engages with adjacent spaces.*

### Response to Item 6

- 2.36. Proposed access arrangements to Duplex Units are set out within OMP’s Design Statement, please see drawing number 19020A-OMP-HT-B1A-DR-XX-1000/2000 for precise details. In order to provide a thoroughly inclusive neighbourhood particular

consideration has been given to the quantum of own-door units with ground level access throughout the scheme.

- 2.37. Of the 345 no. total units 200 no. (58%) feature level access at ground level. All upper level units have been designed in compliance with Part M Guidelines and feature design considerations such as larger entrance lobbies to cater for families and residents various demographics.



### ITEM 7 – Cycle Storage

- 2.38. The seventh item of specific further information relates to cycle storage for the proposed development. This item of the Board's Opinion was as follows:

*Identify the location of cycle storage, its allocation to units and how appropriate security is achieved.*

### Response to Item 7

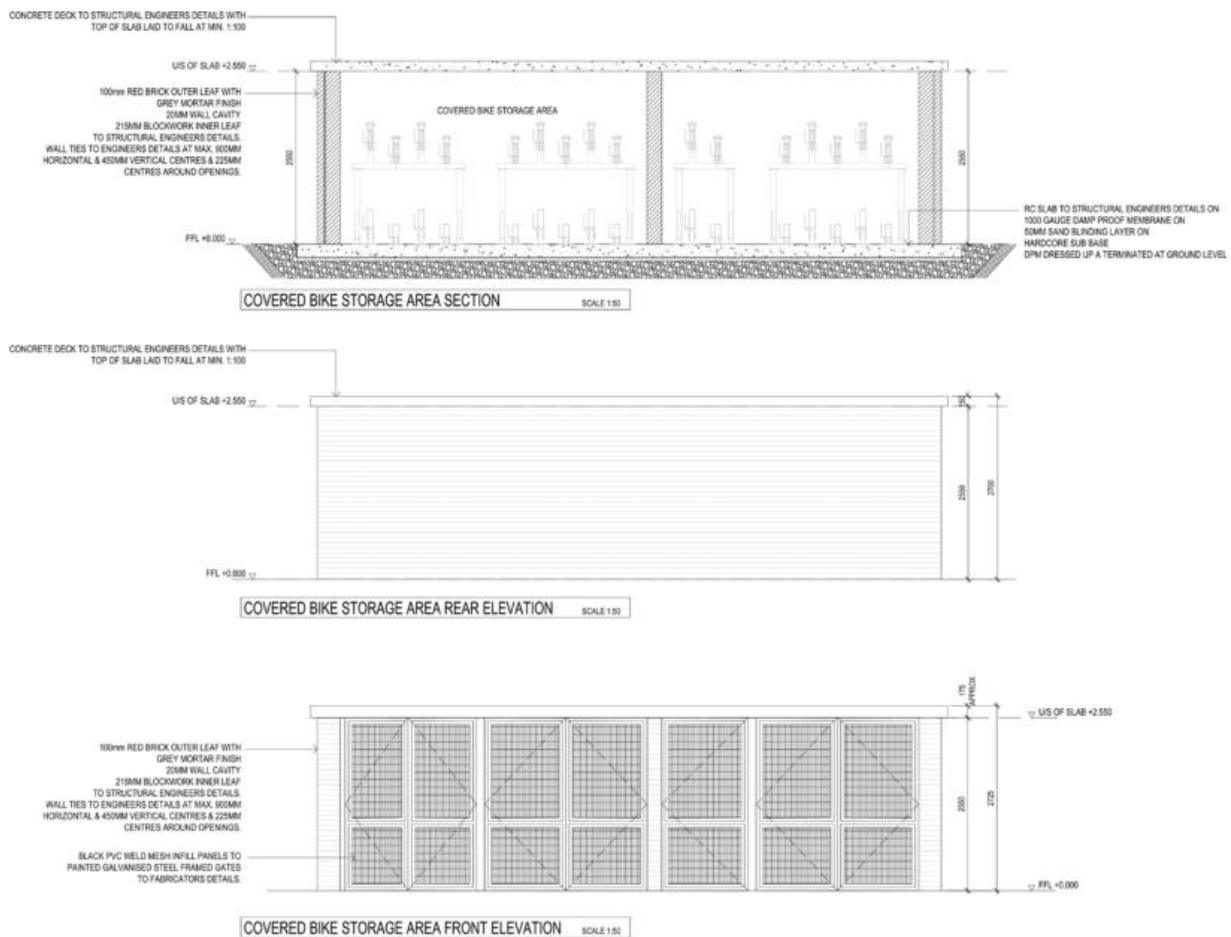
- 2.39. The location of cycle storage, allocation to units and details of security measures have been set out in OMP's Design Statement, please see drawing number xxx for precise

details. Section 4.8 of the BSLA Design Statement also provides additional detail for the cycle parking.

- 2.40. 802 No. bicycle parking spaces comprising including 128 No. visitor spaces and 10 No. to serve the creche.
- 2.41. The location of the proposed Long Stay (Residents / Creche Staff) and Short Stay (Visitors) bicycle parking is detailed in Section 5.1 of the applications Traffic and Transport Assessment Report.



**Figure 2.5: Overview of bicycling parking locations and accessibility (Source: BSLA, 2022).**



**Figure 2.6: example of long stay bicycling parking solutions proposed (Source: BSLA, 2022).**

### ITEM 8 – DMURS Compliance

- 2.42. The eighth item of specific further information relates to the DMURS Compliance and inclusion of surface parking for the proposed development. This item of the Board's Opinion was as follows:

*Demonstrate accordance with DMURS. The inclusion of surface car parking should be considered in light of any impact upon the quality of the proposed landscape, and further detail and/or justification should be provided around this.*

### Response to Item 8

- 2.43. The design of the developments internal streetscape, particularly in regard to the provision of on-street car parking, has been revisited in response to ABP comments to ensure that all streets comply fully with the recommendations of DMURS. All previous instances where perpendicular car parking was located on both sides of the street have been removed from the updated scheme proposals with the quantum of on-street car parking reduced significantly following the introduction of an internal undercroft (beneath landscaped podium level) car park in Block E. Further details of the car parking arrangements are provided in Chapter 5 of the Traffic and Transport Assessment Report whilst a separate DMURS Compliance Statement is also provided.

### ITEM 9 – Building Life Cycle Report

- 2.44. The ninth item of specific further information relates to Building Life Cycle Report for the proposed development. This item of the Board's Opinion was as follows:

*Submission of a building life cycle report in accordance with section 6.3 of the 'Sustainable Urban housing: Design Standards for New Apartments (2020)'. Details should include the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.*

### **Response to Item 9**

- 2.45. A Building Life Cycle Report has been prepared by OMP and other consultants and has been enclosed within this Application.

### **ITEM 10 – Housing Quality Assessment**

- 2.46. The tenth item of specific further information relates to the Housing Quality Assessment for the proposed development. This item of the Board's Opinion was is as follows:

*A Housing Quality Assessment with regard to relevant national and local planning policy on residential development.*

### **Response to Item 10**

- 2.47. A Housing Quality Assessment has been prepared by OMP and has been enclosed within this Application. This Housing Quality Assessment demonstrates compliance with the Fingal Development Plan and the Design Standards for New Apartments (December 2020).

### **ITEM 11 – Daylight, Sunlight and Overshadowing**

- 2.48. The eleventh item of specific further information relates to the Daylight, Sunlight and Overshadowing for the proposed development. This item of the Board's Opinion was is as follows:

*Submission of a Daylight, Sunlight and Overshadowing Assessment providing analysis of both the proposed accommodation and any potential impact upon surrounding dwellings/amenity spaces.*

### **Response to Item 11**

- 2.49. A Daylight, Sunlight and Overshadowing Assessment has been prepared by Axiseng and is enclosed within this Application. This report has found that the all of the proposed apartments and houses and proposed open space areas are achieving the required daylight/sunlight standards, and there are no significant impacts on existing neighbouring properties.

- 2.50. This report concludes:

*"In general terms the impact of the proposed development is considered low in terms of daylight and sunlight and in compliance with the BRE guidance.*

*As discussed throughout the report, only minor changes in shading impact are observed to rear windows of 2nd House situated on Golf Links Road. Axiseng's analysis presented in this report indicates that the daylight access to the window through both VSC and APSH methodology indicate there is no significant impact to existing window as result of proposed development and the results are in line with criteria outlined in BRE guide.*

*It is possible to conclude that the design of the proposed development has been given detailed consideration and care has been taken to ensure that the principles outlined in the BRE guide have been carefully taken into consideration in order to achieve level of sunlight and daylight.*

*A separate Climate Based Daylighting Assessment Report includes results under both IS EN 17037 and BS 17037 (Annex) has been carried out. This separate report should be reviewed for the IS EN 17037 and BS 17037 analysis carried out.”*

### **ITEM 12 – Infrastructure Upgrades to Golf Links Road**

- 2.51. The twelfth item of specific further information relates to the infrastructure upgrades to Golf Links Road. This item of the Board’s Opinion was is as follows:

*Detail of infrastructure upgrades to Golf Links Road and the timeframe for delivery in context with the phasing programme for the proposed development.*

#### **Response to Item 12**

- 2.52. Details of the proposed off-site infrastructure works along Golf Links Road, to be undertaken by the applicant as permitted under a separate planning application (Ref ABP-309409-21 and F20A/0324) are provided in section 4.1 of the Traffic and Transport Assessment. These works include (i) the reconstruction of the Millers Lane / Shenick Rd / Golf Links Rd to provide a four armed mini roundabout, (ii) provision of zebra crossings on all four arms, (iii) the implementation of flat top traffic calming ramps on all arms of the junctions, (iv) upgrades to street lighting, (v) upgrades to the junction of Downside Height / Golf Links Road, (vi) traffic calming ramps along Golf Links Road, and (vii) a new segregated two-way cycle path and parallel footpath along Golf Links Road between Downside Heights and Shenick Rd. As per the planning conditions (No. 2b) applied to the grant of planning permission these proposed road upgrades will be completed prior to the completion of the construction (50% occupation) of the remaining Hacketstown Local Ara Plan lands.

### **ITEM 13 – Future Connections to Water Supply and Wastewater**

- 2.53. The thirteenth item of specific further information relates to future connections to water supply and waste water for the proposed development. This item of the Board’s Opinion was is as follows:

*Additional detail of arrangement for future connections to water supply and wastewater services is required in consultation with Irish Water.*

#### **Response to Item 13**

- 2.54. The proposed designs have been accepted by Irish Water - The proposed future Connections to Water Supply and Wastewater as fully set out in DBFL’s Engineering Services Report and associated drawings. We also included correspondence with Irish Water included Certificate of Design Acceptance within Appendix 2 of the Application Form.

### **Item 14 Article 299B(1)(b)(ii)(II) and article 299B(1)(c)**

- 2.55. The fourteenth item of specific further information relates to information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c). This item of the Board’s Opinion is as follows:



*The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.*

#### **Response to Item 14**

- 2.56. The requirements of Article 299B(1)(b)(ii)(II) and Article 299B(1)(c) of the Planning and Development Regulations (as amended) have been fully addressed as part of the Environmental Impact Assessment Report submitted as part of the proposed development.

#### **Item 15 Planning Authority Opinion**

- 2.57. Item 15 of the Board's Opinion is as follows:

*Address each of the 15 no. recommendations outlined in the Planning Authority opinion*

#### **Response to Item 15**

- 2.58. In response to Item 15 of the Board's Opinion which refers to the Opinion of FCC please see the below table:

<b>Recommendation</b>	<b>Response</b>
<p>1. <i>Confirm applicable site area(s), provide a rationale of how the net developable area is calculated and confirm net density of proposal with reference to the Sustainable Residential Development in Urban Areas (DoEHLH May 2009)</i></p>	<p>Please see OMP's Architectural Design Statement which sets out the rationale for net developable area calculation as per methodology set out in the Sustainable Residential Development in Urban Areas (DoEHLH May 2009).</p> <p>The Site Application Boundary extends to 6.7 Hectares. The Net Developable area identified is 6.6 Hectares. This parcel of land provides the basis for density calculations within the development. The Net development boundary includes access roads within the site and public open spaces but excludes district roads and connections to services in accordance with the Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities.</p> <p>Please see section 5.0 of the Statement of Consistency which provides rationale for the proposed density.</p> <p>A generous quantum of Public Open Space that almost doubles the required 15%, Additionally these slopes are not be so great when the regrading of this area has been complete.</p>
<p>2. <i>Increased separation distances or design mitigation are required between the rear of existing dwellings and proposed three storey residential building</i></p>	<p>Adequate separation distances and design mitigation measures have been undertaken to respect the privacy and amenity of adjacent dwellings. 3 Storey duplexes at Blocks B2 &amp; G have been positioned 22m or greater from existing dwellings. In all instances these have been designed so that no living areas overlook the adjacent properties. In addition to this as part of the landscape strategy existing hedgerows are to be enhanced in order to provide screening at ground level.</p>
<p>3. <i>The quantum of proposed private amenity space afforded to all residential units be provided</i></p>	<p>The quantum of private amenity space meeting the standards set out in the Fingal Development Plan and the Apartment Design Guidelines. Please see section 5.0 of the Statement of Consistency for further detail.</p> <p>This is illustrated for individual units within the sitewide HQA prepared by OMP.</p>
<p>4. <i>A Building life Cycle Report should be included with the application</i></p>	<p>A Building life Cycle Report has been prepared by OMP and is enclosed with the application.</p>
<p>5. <i>A breakdown of the apartment blocks and corresponding cycle parking</i></p>	<p>Please see response to Item 7 as detailed above and Section 4.6 of the Landscape</p>

<i>requirement per block/ unit type should be provided</i>	Design Rationale for location and details of cycle parking.
6. <i>Full details of proposed refuse storage/management arrangements in respect of the proposed development should be provided</i>	An Operational Waste Management Plan has been prepared by TMS and is included within this application. Please also see OMP dwg. 19020A-OMP-00-00-DR-A-5000_Bin Stores, Bike Stores & Sub Station the Architectural Design Statement for details of refuse storage/management arrangements (Section 5.0).
7. <i>Proposed noise mitigation measures for specific units affected arising from their location proximate to the western boundary should be detailed</i>	<p>As set out in Chapter 10 prepared by Red Kite of the EIAR the following noise mitigation measures are proposed:</p> <ul style="list-style-type: none"> <li>• <i>Balustrades proposed on balconies for units close to rail line are as high as possible to further improve usability from a noise perspective. The balustrades will be made from a solid material (minimum surface density 10 kg/m<sup>2</sup>) with no gaps in the construction taking account of other factors such as adequate daylighting.</i></li> <li>• <i>The following is an average A-weighted spectrum for passing trains recorded at NMP5 and NMP6 within 10-15m distance unscreened from the rail line:</i></li> <li>• <i>Although the Project will achieve the internal criteria with open or partially open windows, it is recommended that the final glazing chosen during the detailed design stage takes account of the spectral characteristics of train noise as indicated in Table 10.20 above and performs sufficiently at low frequencies to future proof the development and afford residents the option to further reduce noise ingress to indoor areas.</i></li> <li>• <i>Final specifications for glazing and ventilation shall be approved by an acoustic specialist at detailed design stage.</i></li> <li>• <i>Glazing suppliers shall provide laboratory tests confirming the sound insulation performance to BSEN ISO 140 Part 3 1995 and BS EN ISO 717, 1997.</i></li> </ul>
8. <i>Liaise with Fingal County Childcare Committee in relation to the proposed childcare provision at this location</i>	Please see Appendix 1 of Community Audit prepared by JSA which details response from Fingal Childcare Committee whom welcome additional childcare facilities in the area.
9. <i>Submit a revised Childcare Needs Assessment which also considers availability/ vacancy levels in existing childcare facilities in the area.</i>	Please see enclosed Community Audit prepared by JSA which outlines availability/ vacancy levels in existing childcare facilities in the area.
10. <i>Submit plans and elevations of the proposed creche/community building.</i>	Please see dwg. No. 19020A-OMP-00-CR-DR-A-XX-1000_Creche Plans, Elevations prepared by OMP which sets out plans and

	elevations of the proposed creche/community building.
11. Address the issued raised in the report of the Transportation Planning Section and any arising visual impact as a result increased car parking	Section 9.2 of the Traffic and Transport Assessment Report details how the scheme design has been amended to address each of the observations raised by the Transportation Planning officers at Fingal County Council. The amended design has increased the number of car parking provided on-site in parallel with reducing the number of on-street car parking at surface level. This had been successfully achieved through the implementation of an internal under croft (beneath landscaped podium level) car park facility in Block E which services residents of Block E and in part Block A1 and Block F also as located adjoining Block E.
12. Address the issues raised in the report of Water Services Section.	Please see Section 7 of the Engineering Report for response to items raised by the Engineering Department of Fingal County Council.  The proposed designs have been accepted by Irish Water - The proposed future Connections to Water Supply and Wastewater as fully set out in DBFL's Engineering Services Report and associated drawings. We also included correspondence with Irish Water included Certificate of Design Acceptance within Appendix 2 of the Application Form.
13. Address the issues raised in the report of Parks and Green Infrastructure Section	Please see Section 2.2 of the BSLA Design Statement and associated documentation which responds to the concerns of the <i>Parks and Green Infrastructure Section</i> .
14. All topsoil stripping associated with the proposal be monitored by a suitably qualified archaeologist	Chapter 4 of the EIAR provides Archaeological and Cultural Heritage assessment of environmental impact of the project and sets out suitable mitigation measures including supervision by a qualified Archaeologist. The Applicant will accept appropriate conditions in this regard.
15. All details of compliance with Part V requirements should be agreed with the Planning Authority following any grant of permission	Please see Part V pack appended to the Application form and Section 8.0 of the Statement of Consistency for further detail of Part V proposals including validation letter from Fingal County Council.

### 3.0 Conclusion

- 3.1. In conclusion, all the issues raised by An Bord Pleanála in its opinion dated 26th January 2020 have been comprehensively addressed in the planning application submitted to the Board as set out within this statement of response and the accompanying documentation.
- 3.2. The proposed development provides for a significant number of high-quality residential units across a range of sizes and tenures and within a range of building typologies,

with associated childcare facility and open space, in a scheme which effectively responds to the characteristics and constraints of the subject lands with a considered and site-specific design.

- 3.3. The development provides for a range of connections to adjacent areas and adjoining permitted and existing development, including pedestrian and cycle linkages across the site and to Skerries Train Station, the existing road network and to adjacent existing and future residential development.