

## MATERIALS - HOUSES

The houses in character area 1,2 & 3 are designed with a more traditional style and materials pallet, using three brick types complemented by reconstituted stone/ render details around door and window reveals. The houses proposed are primarily finished with a high-quality brick finish on all primary elevations facing the street or other public realm areas. As a low maintenance material, a variety of different bricks chosen for different character areas will ensure that the streetscapes created will endure and retain a high-quality feel for longer. The roofs of the houses will be completed with a dark coloured roof tile to complement the brickwork & U-PVC windows add to the high thermal efficiency of each unit and will also be very low maintenance components.



**Buff brick**  
*Mystique*  
 or similar



**Red brick**  
*Charley Hamsey*  
 or similar



**Buff brick**  
*Wienerberger*  
 or similar



SITE SECTION HH



SITE SECTION II

Figure 55. Site Context Elevations CC and II

## NEIGHBOURHOOD CENTRE - DETAILS

The incorporation of the Neighbourhood Centre into the heart of the envisioned development will provide local facilities to serve both the development and the existing residents of Kiltiernan. The scheme is therefore a positive contribution to Kiltiernan Village as it enhances the local community infrastructure and, in addition, brings a new public open space as the new centrality of the village.

In addition to retail and new office hub, a crèche and medical centre are proposed. All neighbourhood centre uses will be located at the ground floor level, with the exception of office space and crèche at first floor. The ground floor units will be accessed by a bounding permeable public realm in which pedestrian movement is prioritised.

The Neighbourhood Centre is designed having regard to the Kiltiernan Local Area Plan for this subject site in terms of high level architectural quality and urban design. It proposes a contemporary language with a rational rhythm of openings combining with vernacular elements that resonate with the special character of the Kiltiernan traditional built fabric.

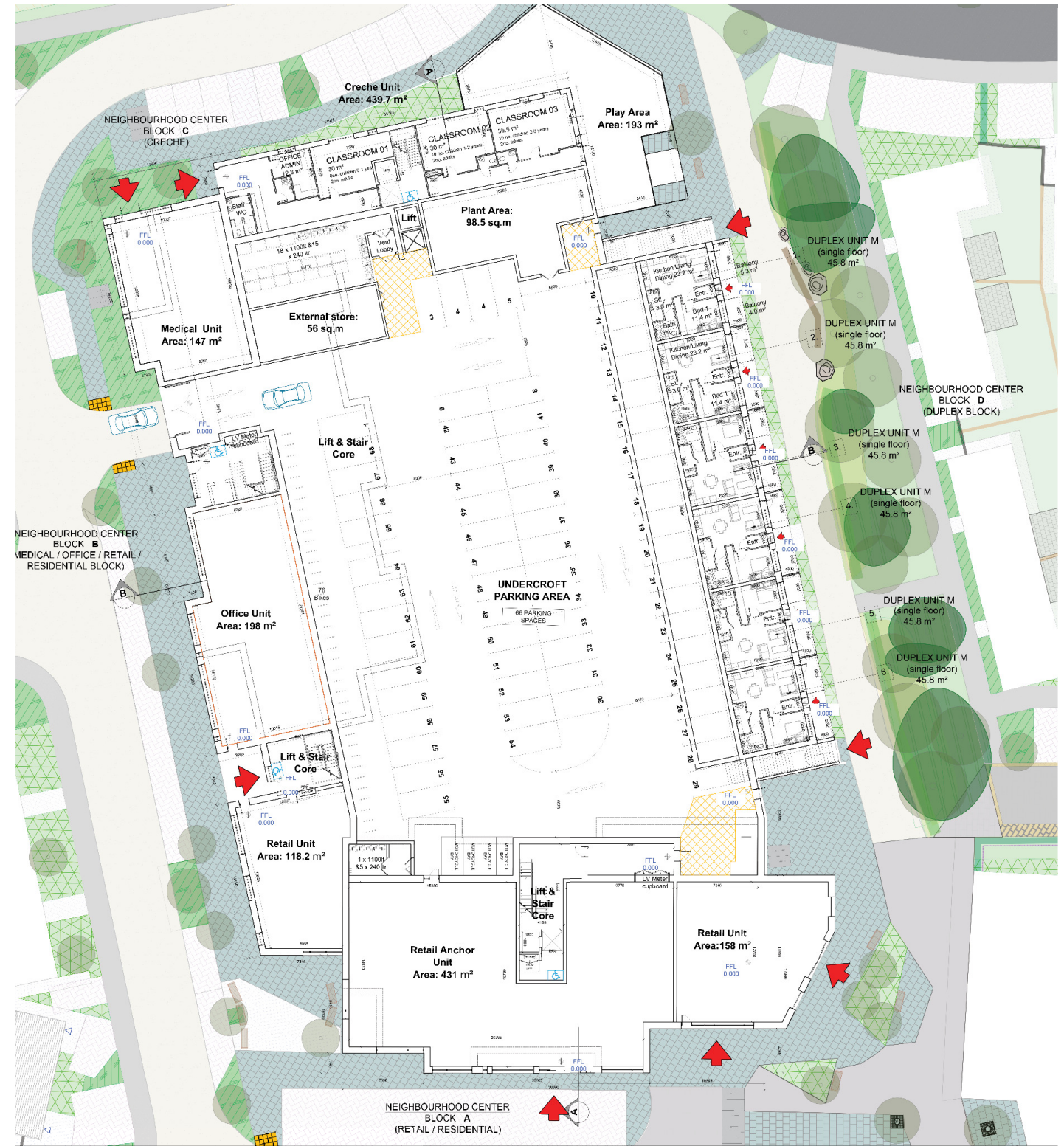
The proposed buildings, ranging from 2 to 4 storeys, comprising the Neighbourhood centre cell are arranged in a closed perimeter block, which breaks at two points in the eastern frontage presenting access points to the communal podium bounded by the different apartments and maisonettes. All of the residential units will share this private open space at first floor level, over an undercroft parking ground level.



Figure 56. South elevation of Neighbourhood Centre.



Figure 57. Neighbourhood Centre E-W section.



### Legend

Creche unit	439 sqm
Office	317 sqm
Medical	147 sqm
Retail	276 sqm
Retail (convenience)	431 sqm

Figure 58. Neighbourhood Centre Ground Floor Plan.

### DUPLEX BLOCK D1(Part of the Neighbourhood Centre)- DETAILS

In addition to the Neighbourhood centre the ground floor of the duplex block D1 consists of a new community facility as well as additional c. 580 sq.m of retail space with These spaces front onto the dingle way and village green and have access from both the north and south sides of the block. A larger retail convenience being located on the ground floor of Block A fronting on to the Village green

The community facility is located in the north eastern portion of the block opposite the NC. The angling of the built form of the block together with the angled form of the NC creates a plaza space which encapsulates the dingle way creating a pedestrian and cycle friendly zone to be enjoyed by all residents and those in the surrounding community. Please refer to RMD Landscape Architects report for further information.

A multi- purpose space is proposed for the community facility and will form a diverse range of social activities in this new vibrant community at this prominent corner of the site.

The retail units contained in the remainder of the block can be sub-divided into individual units depending on the required use.

The Residential units above provide passive surveillance onto the Village green and Dingle way.

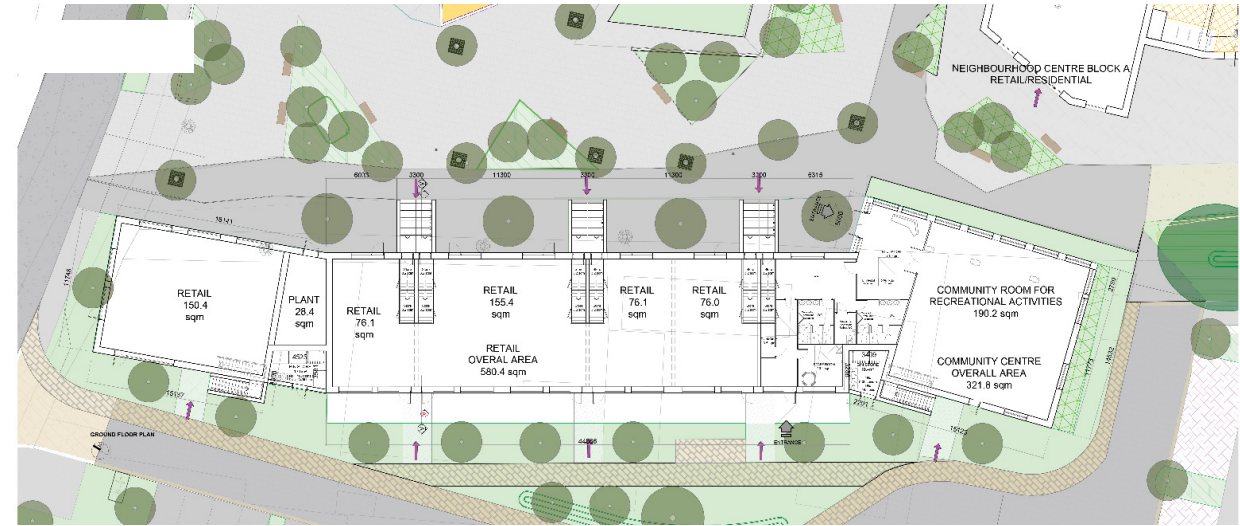


Figure 61. Ground floor plan of Duplex Block D1



Figure 60. CGI of Village green, NC and duplex block D1.



### NORTH ELEVATION

Figure 59. North elevation of Duplex Block D1.

## CAR AND BICYCLE PARKING

Car parking as proposed will not dominate the visual character of the street. In all cases where either on street or in curtilage parking is proposed, a strong street planting scheme has been detailed by RMD Landscape Architects.

Undercroft arrangements by their nature take the car out of the public realm for the apartment buildings and Neighbourhood Centre. The developer will provide car charging points at the outset to the quantity required by a planning authority - a ratio of 1 in every 5 spaces as been provided.

All houses will also be "charger ready".

This is covered in more detail in the Traffic and Transport Assessment document prepared by Atkins Consulting Engineers attached to this application.

Bike parking spaces are provided in different configurations, depending on the necessity of each area. All bike parking areas in undercroft locations will be well demarcated and properly secured. Bike parking for visitors will be provided in some cases on surface where they are designed to be well integrated to the proposed landscaped areas and public realm.



Figure 62. Sample image of vehicular e-charging points .



Figure 63. Sample of cycling lanes along an ecological corridor.



Figure 64. Sample image of secure bike parking spaces provided in undercroft. .

## SUSTAINABILITY

### OVERALL STATEMENT

All of the units will be subject to the NZEB (Nearly Zero Energy Building) requirements of the updated Part L Regulations, from 2021 that are in effect. In terms of energy ratings all of the units on site will have a Building Energy Rating (BER) of A2 / A3.

The measure of compliance with Part L of the Regulations is demonstrated using the Dwelling Energy Assessment Procedure (DEAP) software.

An energy statement has been prepared by Waterman Moylan and accompanies this application

### RENEWABLE ENERGY

Since 2008 and the introduction of the European Performance of Building Directive it has been mandated that each dwelling unit must generate a portion of their energy demand. The proposed buildings supply the renewable energy contribution in order to meet the Energy Performance Criteria of 0.3 as compliance hinges around either the ability to generate hot water (for sanitary purposes) using a heat pump with a related COP of over 230% or providing sufficient photovoltaic capacity to lower the imported energy into the unit.

A summary of the renewable solutions to be adopted on site are:

- Solar Photovoltaic (PV)
- Combined Heat and Power
- Heat pumps

All components proposed to achieve the renewable energy requirements were considered from the early stages of the design process and incorporated within the landscaping and built fabric to minimise any negative visual impact.

### U-PVC WINDOWS

PVC framing is proposed at Kiltarnan for its energy efficiency and low maintenance characteristics compared with aluminium windows.

When assessing the energy efficiency of a window the frame has a bigger impact on the U value than the glass, effectively it is the weakest link in the thermal performance of the overall assembly. PVC framing material performs better than aluminium, having improved insulation qualities. At the point of manufacture the embodied energy of uPVC is 80 MJ/kg whereas the equivalent aluminium figure is 170 MJ/kg, a reduction of over 50%. Although the lifespan of both aluminium and PVC is similar at circa 35 years, aluminium frames depend on their paint cover, minimum of 70 microns, for protection whereas the PVC frame material is designed to be exposed and does not require an outer protective layer, and therefore require less up-keeping.



Figure 65. Sample image of similar building finishes. Comparable size development delivered by Liscove Limited .

### BUILDING FABRIC

The building fabric elements that will be used in the construction of the dwellings will achieve the following performance

Walls	0.18W/m2K
Roof	0.16 W/m2K
Windows	1.4 W/m2K
Floors	0.16 W/m2K

The specified air tightness for the unit is to achieve an air tightness level of 3 air changes an hour or better. Based on previous project experience with Liscove Limited we expect that this figure will be comfortably exceeded within the house/ apartment and duplex types proposed.

### GREEN ROOFS

We are providing a minimum of 60% green Sedum roof to all apartment buildings and 50% on Duplex block D1. This type of green roof requires little maintenance compared to other green roofs as they have shallow roots and only need a small amount of rain water and nutrients to survive. Upkeeping is mostly related to periodic gutters and edge cleaning but the meadow itself requires little attention.

Sedum roof systems have been shown to have benefits for a range of insects. Sedum flowers do provide foraging for pollinators, especially bees in late June, providing much needed habitats and food sources for wildlife and insects.



Figure 66. Sample image of biodiversity



Figure 67. Sample image of biodiversity at sedum roof.

## 5 RESPONSE TO ABP'S OPINION

This section presents the specific responses to ABP's Opinion on the Stage 2 submission of this mixed use development at Kiltiernan. Both the stage 2 (left) and Stage 3 (right) layouts can be seen below for comparative purposes. The stage 3 revised layout shows an enhanced layout the phase 5 lands with a newly proposed duplex block that compromises additional retail and community space. The strategy proposes a diverse and integrated public realm within the overall built environment, as presented in this Architectural and Urban Design Statement prepared for this Stage 3 submission.



Figure 68. Layout at stage 2 submission



Figure 69. Current Layout for this stage 3 submission

A Stage 2 of this SHD submission (displayed in previous figure no.68) 397 no. residential units (165 no. houses, 132 no. duplexes and 100 no. apartments) with crèche, retail office and medical facilities in November 2021 (ABP-312007-21) were proposed. Items highlighted by ABP are responded to below, in addition to the overall justification and rationale in this Architectural & Urban Design Statement for the overall layout (illustrated in figure no.69). We have had due regard to these comments in finalising the designs for the scheme and corresponding documentation lodged for Stage 3.

**Design and Layout** issues indicated by ABP have been addressed as follows:

1. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with specific objectives of the Kiltiernan LAP 2023 for Land Parcel 22. Such statement should have regard to the development plan and or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.

**RESPONSE:** The proposed layout has had due regard to the Kiltiernan LAP 2023, for land parcel 22. and can be summarized as follows:

**Type of Development:** The proposed Neighbourhood Centre will be the heart and community hub of Kiltiernan. The frontage provided onto Enniskerry Road, through a combination of buildings and open spaces, will enliven the streetscape and will provide a meeting point for the local community.

The development of the Neighbourhood Centre will be integrated into the local community, and includes the following (in addition to some residential units):

- Retail (857 sq m)
- Retail (convenience) (431 sq m)
- Creche (439 sq m)
- Office (317 sq m)
- Medical (147 sq m)
- Community Facility (321 sq m)

There will also be residential units proposed in Land Parcel No. 22. The total Neighbourhood Centre area will be 2,512 sq m. The retail units will serve the future residents and the community of Kiltiernan, which will be a great benefit for the area.

There will be a Village Green provided fronting Enniskerry Road and a plaza area surrounding the Neighbourhood Centre. It is clear that the proposed Neighbourhood Centre and open spaces will be the heart of the village.

**Uses to be specifically encouraged :** As noted above, the Neighbourhood Centre will make a positive contribution to the services available for the local community.

**Uses to be specifically discouraged:** As above

**Density / Plot Ratio:** The density of the residential development will be 44.55 No. units per hectare.

The proposed office space is 317 sq m, with 198 sq m at ground floor and 119 sq m at first floor. We note that the first floor is not directly over the ground floor office, it is located above the retail unit. To achieve a ratio of 1:0.5 with the provision of 317 sq m of office space, this would require a footprint of 159 sq m. The footprint at ground floor is 198 sq m which is slightly in excess of the ratio provision. Thornton O'Connor Town Planners have included this in the Material Contravention Statement.

**Height:** Development on the Neighbourhood Centre lands is in accordance with the height parameters - 2 - 4 storeys

**Building Materials** The material palette currently comprises brick, cladding, render and stone. An element of granite will be incorporated into the boundary walls.

**Architectural Style Specifications:** the Neighbourhood Centre proposes a contemporary language with a rational rhythm of openings combining with vernacular elements that resonate with the special character of the Kiltiernan traditional built fabric. A public art feature will be provided in the central civic space (Village Green). Please see the Landscape Rationale enclosed for typical examples.

**Special Conditions:** The development has considered the design principles of the Kiltiernan Neighbourhood Framework Plan.

**Other Comments:** There are many permeable connections provided through the site from Enniskerry Road and Glenamuck Road through the site to Rockville and to the future GLDR, including the Dingle Way. Bin storage on site will include recycling facilities. Parking is well integrated within the scheme into a well landscaped streetscape, with some spaces provided in an undercroft in the Neighbourhood Centre and in the apartment blocks.

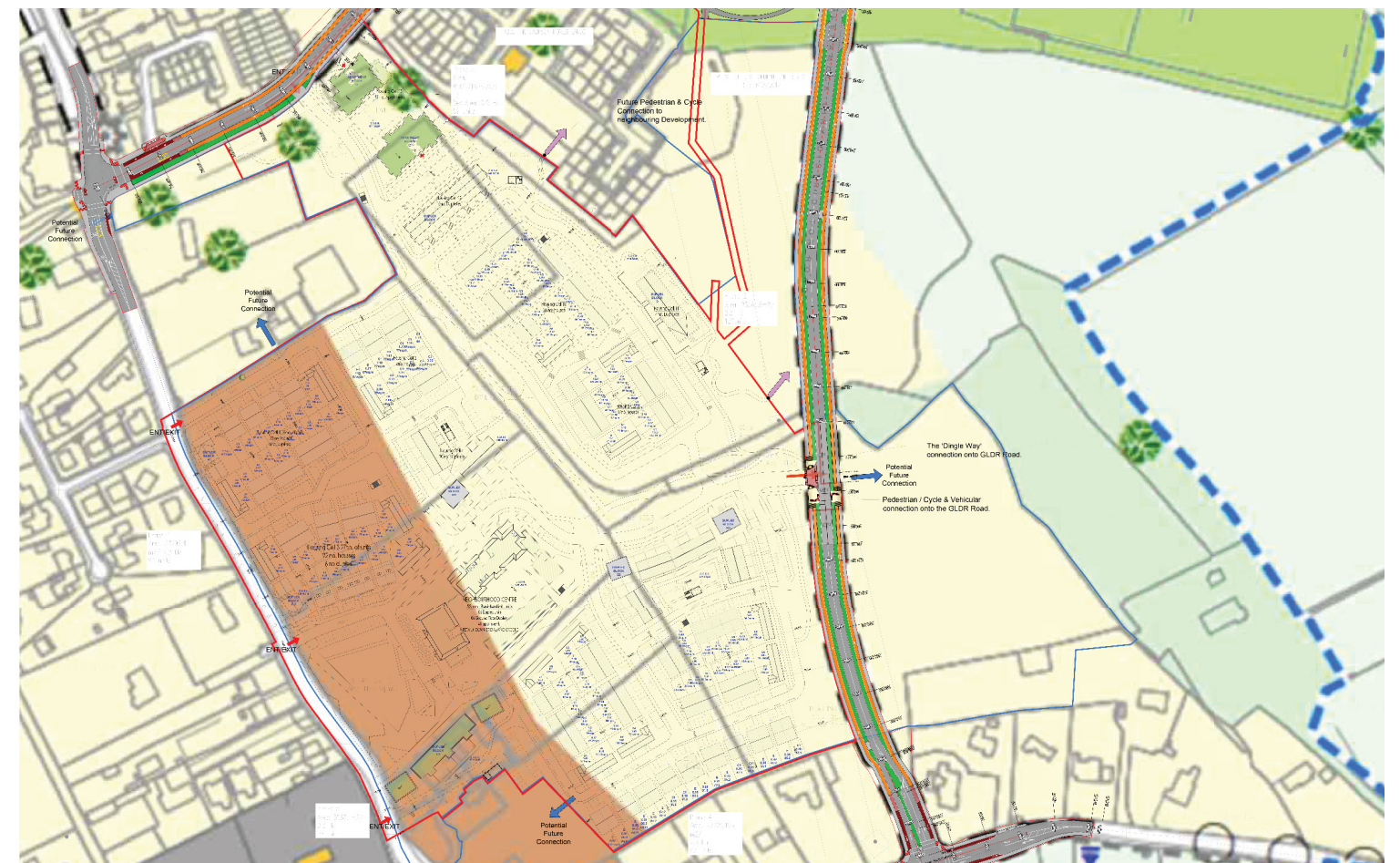


Figure 70. Current Layout overlay on the Dun Laoghaire - Rathdown Development Plan 2022-2028

2. A detailed statement demonstrating how the mix and quantum of non-residential use proposed within the Neighbourhood Centre is appropriate, given the 'NC' zoning and associated specific objectives set out in the Kiltiernan LAP 2023 and the level of residential development permitted to date and proposed for the wider Kiltiernan area.

**RESPONSE:** At the outset, we note that the provision of non-residential uses has increased by 866 sq m since the pre-planning scheme lodged to An Bord Pleanála (and commented upon in the An Bord Pleanála Opinion), principally provided with a significant increase in the quantum of retail floor area and the provision of a community facility.

	Pre-Planning	Current Submitted Scheme	Total
Creche	400 sq m	439 sq m	+39 sq m
Office	364 sq m	317 sq m	-47 sq m
Medical	158 sq m	147 sq m	-11 sq m
Retail	274 sq m	857 sq m	+583 sq m
Retail (convenience)	450 sq m	431 sq m	-19 sq m
Community	0 sq m	321 sq m	+321 sq m
<b>Total</b>	<b>1,646 sq m</b>	<b>2,512 sq m</b>	<b>+866 sq m</b>

A full response to the relevant policies of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 ("Development Plan") and the Kiltiernan-Glenamuck Local Area Plan 2013-2019 [extended to September 2023] ("Kiltiernan LAP") is provided in the Planning Report & Statement of Consistency prepared by Thornton O'Connor Town Planning.

In relation to the provision of non-residential floorspace, we would like to refer An Bord Pleanála to the Social Infrastructure Audit prepared by KPMG Future Analytics. The Report notes:

'The subject proposal includes the provision of a neighbourhood centre (c.2,512 sqm) comprising retail space (c.431 sqm convenience and 857 sqm retail), office space (c.317 sqm), a medical facility (c.147 sqm), a community facility (c.321 sqm) and a crèche (c.439 sqm). The size provided for the neighbourhood centre (which has a combined retail floor area of 1,288 sq m, an increase of 564 sq m since the tripartite meeting during Stage 2) in conjunction with the existing and pipeline retail facilities is sufficient to cater for additional demand generated by the proposed scheme, which has further been detailed below. Therefore, the proposed development would be considered to be well within the requirements of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (and the Retail Strategy for Greater Dublin Area)[1]'. [Our Emphasis]

Therefore, it is considered that the provision of non-residential floorspace in the proposed Neighbourhood Centre including the significant additional floorspace provided since the pre-application stage is appropriate and will adequately serve the existing and future population in the Kiltiernan area without causing concern in relation to the potential for significant vacancies in the proposed units given the challenging retail environment. Overall, the additional services provided within the Neighbourhood Centre will be a significant benefit for the future residents of the proposed development and the wider Kiltiernan community.

3. A detailed statement demonstrating how the proposed development ties in with the wider development strategy for the landholding and the overall Kiltiernan Area, with regard to a phasing strategy.

**RESPONSE:** It is clear that permission can be granted for the subject development, notwithstanding that the proposed development may represent a material contravention of the phasing set out in the Kiltiernan LAP, especially having regard to recent precedents in Kiltiernan and the fact that the GDRS scheme will be commencing construction this year as confirmed by Dun Laoghaire-Rathdown County Council. It is considered that the addition of 383 No. units and Neighbourhood Centre will not give rise to any significant planning difficulties. Please refer to Thornton O'Connor Town Planning reports for further information on the phasing strategy.

4. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory Plan 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 refer to Thornton O'Connor Town Planning reports for further information on the above.

5. Justification of tree loss, hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standards.

**RESPONSE:** Please refer to RMD Landscape Architects report for further information on the above.

6. An up to date Ecological Assessment, inclusive of a Bat Survey.

**RESPONSE:** Please refer to Scott Cawley Limited report for further information on the above.

7. 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 refer to RMD Landscape Architects report for further information on the above.

8. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:

- Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.
- Impact to any neighbouring properties devoid of proposed and existing landscaping and trees.

**RESPONSE:** Please refer to 3D Design Bureau's report for further information on the above.

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

**RESPONSE:** Please refer to 3D Design Bureau's report for further information on the above.



10. A response to matters raised within the PA Opinion submitted to ABP on the 6th January 2022

i Demolition

There are no Protected Structures on site and the lands do not form part of an Architectural Conservation Area, therefore no issue arises with the proposed demolition of existing farmyard buildings as those do not appear to have any particular architectural value. It is noted that the development description states that the demolition relates to derelict farmyard buildings only, however, it would appear that the demolition of the dwelling (categorized as 'derelict' in the survey submitted) 'Rockville' (Eircode D18 Y199) would also be carried out to facilitate the proposed development. Clarity should be provided on the extent of demolition proposed and type of buildings involved in any future application.

**RESPONSE:** The derelict house 'Rockville' together with its out buildings will be demolished as part of this planning application. This is now reflected in the Statutory Notices. The derelict structures on site are of no architectural merit and they will be replaced with a more sustainable and high-quality development etc. Please refer to MCORM drawings PL 106-107 detailing the nature of the extent of demolition proposed.

iii Mix of uses provided within the Neighbourhood Centre

The Applicant is proposing to provide a creche (400 sq m), office (364 sq m), medical (158 sq m), retail (274 sq m) and convenience retail (450 sq m).

The Planning authority notes that demographic profile of the ED Study Area, as outlined within the submitted 'Social Infrastructure Audit and Retail Services Assessment'; Section 7 'Conclusion' has grown 10 percent more than the rest of DLR Council area within the 2000 to 2016 intercensal time period. The report states that these statistics, in conjunction with considering future population growth which will be facilitated by developments such as the current scheme, 'indicate that a higher proportion of community facilities may be required for the working population and families with school aged children in this area than in other demographic groups.'

On this basis, the Applicant should consider the provision of cultural and community uses in line with the LAP Objectives SCD01 and NC01 and also Section 11 of the LAP. The Planning Authority would also highlight objectives within the LAP to relocate the Country Market from its current location to Land Parcel 22, potentially within a civic plaza area.

Having regard to the objectives of the LAP for the Neighbourhood centre to function as the 'heart; of Kiltiernan the Applicant is advised to consider increasing the quantum of retail provided, and the quantum of non-residential uses floor space proposed overall, having regard to the requirements for Parcel 22 set out in Section 11 of the LAP. Whilst regard is had to the Retail Assessment submitted by the Applicant, it appears to rely on existing retail areas between 1.5 and 2km from the subject site (i.e. on the outer edge of a 15 min walking distance), which would necessitate people accessing these mainly by car.

**RESPONSE:** The Layout presented for this stage 3 submission has had due regard for an increase in the quantum of retail provided by way of the following

Retail quantum submitted for stage 2 - 274 sq.m

Retail quantum submitted for stage 3 - 857 sq.m

The additional retail is proposed within the ground floor of duplex block D1 together with a new community facility (321 sq.m) for both the residents of this proposed development and the surrounding area. This represents a significant increase in the overall commercial, community and supporting uses other than residential proposed.

iv. Layout

It appears that the proposed layout generally follows the design principles of the Local Area Plan. The Applicant should provide as part of any future application a statement demonstrating that the principles established in the Kiltiernan Neighbourhood Framework Plan have been followed,

**RESPONSE:** The layout presented in this document and in the drawings has had due regard for the Development Plan, the Local Area Plan and the Neighbourhood framework Plan.

The layout of the Kiltiernan NFP has been duly considered in the design of the proposed development, which is slightly varied in comparison. Elements such as the location of the retail, commercial/office, and residential dwellings etc. to the north-east of the Village Green have generally been provided in that location. The community facility and retail units shown to the north-west of the Village Green in the Kiltiernan NFP are provided to the south-east of the Village Green in the proposed development. The community facility and retail units shown to the north-west of the Village Green in the Kiltiernan NFP are provided to the south-east of the Village Green in the proposed development.

The residential units are generally provided in the indicated locations but vary slightly to the north-east of the Village Green. In addition, the derelict dwellings and outbuildings on site which are proposed to be demolished (not of any architectural merit) have not been demolished on the Kiltiernan NFP layout, however the demolition of these structures is required in order to appropriately densify these underutilised lands. Residential units, retail and a community facility will be provided in the general location of these derelict structures to be demolished. The area to the south-east of the structures to be demolished are not included in the application site boundary.

We further note that the uses provided i.e. retail, community, office, residential etc. are all in accordance with the zoning objectives pertaining to the subject lands. The proposed Neighbourhood Centre is incorporated into the heart of the envisioned development and will provide local facilities to serve both the development and the existing residents of Kiltiernan.

The high-quality scheme is therefore a positive contribution to Kiltiernan Village as it enhances the local community infrastructure, brings new public open spaces to serve the scheme and the village, and activates and provides passive surveillance of the surrounding spaces and streets.

Chapter 2 of the Kiltiernan LAP sets out the development framework for the Neighbourhood Centre zone:

'Ideally there should be one Neighbourhood Centre to feature as the civic core for the LAP area. The provision of two centres, on opposite sides of Enniskerry Road, somewhat dilutes potential focus. It is intended that the southern-most NC node (Parcel No. 22) will be the primary node.'

'The Framework Plan envisages that the node centred around Our Lady of the Wayside Church will become the primary retail, commercial and community focus for the village, centred on a new 'village green' that will become the heart of the village.'

The proposed development includes a Neighbourhood Centre and is therefore consistent with this development framework.

The proposed development is designed having regard to the layout shown in the Kiltiernan NFP for this subject site in terms of high architectural quality and urban design and reflects the aspiration for the provision of a high-quality Neighbourhood Centre in the centre of Kiltiernan Village.

The layout of the proposed Neighbourhood Centre sits well in its context and allows the rest of the site to be appropriately densified in accordance with National Policy which seeks compact growth. Please refer to Thornton O'Connor's Planning Report & Statement of Consistency for further information

The interface with Enniskerry Road and how the proposal contributes to creating an attractive streetscape is of particular importance.

**RESPONSE:** The interface with the Enniskerry road has been considered in some detail as part of our design solution. There is frontage along the length of the Enniskerry road with a wide variety of typologies in varying scale to create visual interest as well as passive surveillance and an active public realm to the scheme. Landscaping has also been considered along this public thoroughfare with the Village Green and the Neighbourhood centre opening onto Enniskerry Road and providing considered focal points from the Enniskerry Road. Please refer to RMD Landscape Architects for further information and please refer to CGI's included with this application which illustrates the high quality of the frontage interface along the Enniskerry Road.

Any future connections with adjoining lands shall be built up to the boundary with no ransom strips and should be given to the Council for taking-in charge. That should be clear as part of any future application.

**RESPONSE:** All connections to adjoining lands have been taken up to the boundaries therefore no ransom strips will occur. Please see drawings PL 101-105 for further details.

The relationship between the Neighbourhood Centre and the 'Village Green' public open space is deemed to be a key aspect. The Applicant should consider the removal of car parking spaces and vehicular traffic in between both elements to improve the relationship between them.

**RESPONSE:** The relationship between the village green and the neighbourhood centre is a vital aspect of this proposed scheme. We have removed 7 no car parking spaces from in front of the village green however due to the nature of the commercial uses of the Neighbourhood centre some accessible and parent and child parking is needed on surface in a convenient and safe location. This area will be landscaped appropriately to with a very high quality finish to ensure any parking will have minimal impact on this public realm area.

v. Density

The proposed net density of around 45 units per hectare is considered consistent with the requirements of the Local Area Plan. As part of any future application the applicant should detail the areas excluded from the net site area calculation and the rationale for same, on the basis of, inter alia the 'Sustainable Residential Development in Urban Areas' Guidelines' (2009). The Applicant should, nonetheless, ensure that density is as much as possible evenly distributed across the site rather than creating pockets of higher density (the north portion of the site, for instance) compared with other areas where density appears to be substantially lower (from a cursory examination the south part of the site appears to have much lower density)

**RESPONSE:** The net density calculation, resulting in 44.5 units per hectare, is informed by the national Sustainable Guidelines for Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) 2009, which states that a net density excludes "major and local distributor roads major and local distributor roads; primary schools, churches, local shopping etc.; open spaces serving a wider area; and significant landscape buffer strips. Accordingly, the distributor road and additional road works (drainage), the retained tree lined areas, the village Green, Dingle way and the bounding landscaped area beneath the power lines along the eastern have been excluded from the net site area for the density calculation, as outlined in the table below:

Exclusions	Area (m2)
O.S 1 - Linear Tree line	5451
O.S 4 - Linear Tree line	903
O.S 5 - Linear Tree line	1247
O.S 6 - Linear Tree line	313
Linear Park - Area under power lines	3077
Village Green	4186
O.S 9 - Tree Area adjacent Glenamuck Road	2732
Internal link street	2587
Dingle way	1572
<b>Total Exclusions</b>	<b>22068</b>

The apartment blocks C&D are proposed in the northern portion of the site proximate to the neighbouring Rockville development which includes a taller apartment block directly adjacent the subject site boundary and thus more appropriate with the existing context in this location.

We respectively state that a balance between integrating a legible and efficient residential scheme into the site context of Kiltarnan and the delivery of an efficient urban structure has been achieved. The combination of housing, duplex and apartment typologies allows for a varied mix of unit types and sizes, while delivering an average net density of c. 44.5.0 units per hectare.

vi. Separation distances and residential amenity

Separation distances between blocks and with the site's boundaries are generally satisfactory and considered to prevent undue overlooking. Plans, elevations and sections should be provided as part of any future application detailing separation distances and orientation of windows to satisfactory demonstrate that no overlooking would occur.

**RESPONSE:** Distance between internal façades of houses in rear gardens and apartments/duplexes in communal courtyards are set at a minimum distance of 22 metres. In a limited number of locations wide fronted house types have been introduced in the interest of variety and maximising active street frontage. These units have no first floor windows to habitable rooms to avoid any overlooking and separation distances have been slightly reduced in these instances. Private rear gardens comply with the development plan guidelines in all cases. Separation distances between the units and the site boundary are carefully considered and where appropriate windows are opaque to prevent overlooking of adjacent dwellings. Please see MCORM's architectural drawing pack for further details