

DOWNEY

29 Merrion Square, D02RW64

STATEMENT OF RESPONSE TO LRD OPINION

**Proposed Large-scale Residential
Development**

**Lands at Elmfield,
Ninth Lock Road, Clondalkin,
Dublin 22.**

Applicant: Thornmeadow Developments Limited.

August 2026

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	RESPONSE TO LRD OPINION	4
	SECTION 1.0: 32D – RESPONSE TO SDCC OPINION	4
	ITEM NO. 1.1	4
	ITEM NO. 1.2	5
	ITEM NO. 1.3	5
	ITEM NO. 1.4	6
	ITEM NO. 1.5	6
	ITEM NO. 1.6	7
	ITEM NO. 1.7	7
	ITEM NO. 1.8	8
	ITEM NO. 1.9	8
	ITEM NO. 1.10	9
	ITEM NO. 1.11	9
	ITEM NO. 1.12	11
	ITEM NO. 1.13	11
	ITEM NO. 1.14	13
	ITEM NO. 1.15	13
	ITEM NO. 1.16	14
	ITEM NO. 1.17	14
	SECTION 2.0: 32D – SPECIFIC INFORMATION REQUIRED FOR LODGEMENT	15
3.0	CONCLUSION	27

© DOWNEY 2026

DOWNEY Document Control			
	Name	Date	Version
Prepared by	Iga Galaszewska Assistant Planner	22/05/2026	DRAFT_V_01
Approved by	Donal Duffy MIPI Director	24/08/2026	FINAL_V_02

1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Statement of Response to South Dublin County Council's LRD Opinion, on behalf of our client and the applicant, Thornmeadow Developments Limited. This statement is to accompany a proposed Large-scale Residential Development (LRD) on lands at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22. The proposed development subject to this LRD application provides for:

"We, Thornmeadow Developments Limited, intend to apply for permission for a Large-Scale Residential Development on lands at the Securispred Logistics site, Elmfield Industrial Estate, Ninth Lock Road, Clondalkin, Dublin 22.

The proposed development will consist of the demolition of the existing warehouses and structures on the site and the construction of a mixed-use residential led development comprising a total of 408 no. residential units (403 apartments consisting of 24 no. studio units, 230 no. 1 bed units and 149 no. 2 bed units, and 5 no. 3 bed 2 storey houses) and 1 no. childcare facility. The proposed development will comprise the following:

- (a) Block 1 is a 9-storey mixed-use building comprising 64 apartments (32 no. 1 bedroom units, 32 no. 2 bedroom units), with associated private balconies; bin store; plant and switch room; esb substation; green roofs; pv panels at roof level and a childcare facility at ground level.*
- (b) Block 2 is a 5-storey apartment building comprising 114 apartments (24 no. studio units, 54 no. 1 bedroom units, 36 no. 2 bedroom units) with associated private balconies/terraces; bin stores; bicycle parking; plant rooms; a communal roof terrace at fourth floor level; green roofs and pv panels at roof level.*
- (c) Block 3 is a 5-storey apartment building comprising 112 apartments (68 no. 1 bedroom units, 44 no. 2 bedroom units) with associated private balconies/terraces; bicycle parking; bulky items stores; bin stores; plant and switch rooms; 2 no. esb substations; green roofs and pv panels at roof level.*
- (d) Block 4 is a 5-storey apartment building comprising 113 apartments (76 no. 1 bedroom units, 37 no. 2 bedroom units) with associated private balconies/terraces; bin stores; bicycle stores; bulky item stores; 2 no. esb substations; plant and switch rooms; green roofs and pv panels at roof level; and undercroft car parking (62 no. car parking spaces and 2 no. motorcycle parking spaces).*
- (e) 5 no. own-door houses (comprising 2 no. 2 storey, 3-bedroom detached units; and 3 no. 2 storey, 3-bedroom terraced units) with associated private balconies/terraces.*
- (f) The proposed development will also comprise 202 no. car parking spaces (140 spaces at surface level and 62 no. at undercroft level and including EV and Accessible spaces), 752 no. bicycle parking spaces (comprising short-term surface spaces, long-term spaces in bike stores and cargo bike spaces), 2 no. motorcycle parking spaces, refuse and storage areas, plant, landscaping, open space, boundary treatment, public lighting, drainage, and all infrastructural and engineering works necessary to facilitate the proposed development, including connections to existing services at the Ninth Lock Road and New Nangor Road. Vehicular access will be via the existing industrial estate road off Ninth Lock Road."*

Following consultation with South Dublin County Council under the Planning and Development Act, 2000 (as amended), a Section 247 LRD Meeting was held on the 21st October 2025 under Ref. No. LRDP012/25 and a Section 32B LRD Meeting was held on the 28th January 2026 under Ref. No. LRDP008/25. This Statement of Response to South Dublin County Council is following this LRDP008/25, Section 32B LRD Meeting and it is noted that the application is being lodged within the statutory 6-month period.

The Statement now sets out a response to South Dublin County Council's LRD Opinion. This Statement of response should be read in conjunction with all drawings and documentation submitted as part of this LRD planning application.

2.0 RESPONSE TO LRD OPINION

Below is an overview of the applicant's and Design Team's responses, to that of the noted points for which have been prepared in tandem with relevant drawings and documentation entailed in the LRD application pack.

Please note: the following sections presents a summary of the Council's opinion laid out in italic text, followed by the Applicant's response.

SECTION 1.0: 32D – RESPONSE TO SDCC OPINION

ITEM NO. 1.1

SDCC Opinion:

In terms of urban design and pedestrian safety and comfort, and the allowance of space for users and uses other than car parking, the quantity and arrangement of car parking in the scheme is excessive, and this is considered to constitute a constraint on residential density.

Applicant's Response:

Following the advice provided by the Council in the 32D Pre-Planning consultation and the LRD Opinion, the design team have redesigned the proposed development to be more pedestrian focused. At Pre-Application stage, there was perpendicular car parking on both sides of the main road in the site. However, following this Opinion, the design team has reconsidered this approach. In this regard, the design submitted in the final planning application has relocated the parking from the main entrance and road to the surrounding roads and namely the design is now providing an under-croft car park beneath Block 04 to ensure the proposed development provides sufficient car parking while also providing a more pedestrian focused design. The landscape design and areas of open space is more prominent along the centre of the site and more planting strips are provided between parking bays. This further improves the urban design approach for the site and emphasises pedestrians and cyclists over vehicles. The Planning Authority is invited to refer to the architectural drawings and Design Statement, prepared by O' Mahony Pike Architects as well as the landscape architecture pack

by Austen Associates for further information regarding the overall proposed car parking provision for the development.

Furthermore, A Quality Audit has been prepared in support of this application, which ensures that all aspects of the design are appropriate and safe for pedestrians, cyclists and more vulnerable users. The Planning Authority are invited to refer to the Quality Audit by PMCE for more details.

We note that the quantum of car parking being provided is consistent with the standards set out in the Development Plan and Sustainable Residential and Compact Settlement Guidelines and also in keeping with the Opinion of the Planning Authority, noting the level of public transport serving the site and its town centre location.

ITEM NO. 1.2

SDCC Opinion:

In relation to residential density, the net site area (which indicates the appropriate density under the Residential Development and Compact Settlement Guidelines 2024) should exclude the area in which development is restricted due to presence of overhead cables. This may indicate that a reduction in residential density is appropriate.

Applicant's Response:

For clarity, the overall red line area measures 2.66 hectares. However, this includes the area running north towards New Nangor Road, which is to facilitate potable, foul and surface water mains to the site only. The development site area is 2.29 hectares. When the area below the overhead power lines is excluded, the net site area is 2.2 hectares.

The net residential density is set at 185 units per hectare. This is based on a net site area of 2.2 hectares and specifically excludes the area below the overhead power lines, as well as excluding the area running north towards New Nangor Road, which is solely for the purposes of providing potable, foul and surface water mains to the site and does not include any above ground works. The Planning Authority are invited to refer to Chapter 4 of OMP's Design Statement for an illustration of the net density.

The net residential density of 185 uph is consistent with the density standards set out in the Sustainable Residential and Compact Settlement Guidelines, which would support densities of up to 250 units per hectare within a centrally located town centre zoned site.

ITEM NO. 1.3

SDCC Opinion:

The site's red line boundary should be extended to take in the access road to the west, to better configure the junction at the site access, and to provide for improvements to the public realm west of the site.

Applicant's Response:

Following the issuing of the Council's Opinion, South Dublin County Council confirmed that this road is not taken in charge by them. Therefore, the applicant has no control to extend the red line and provide for improvements to the public realm along this roadway. However, it is likely that over time and in accordance with future developments taking place on adjoining sites that public realm improvements will take place on the road to the west. Nonetheless, the design of this proposed development ensures that full pedestrian and cycle connectivity can be accommodated and will support a future connection from Ninth Lock Road through this site and eastwards into Riversdale.

We note that the proposed layout has been subject to a Quality Audit and Road Safety Audit by PMCE (which is submitted under separate cover) and ensures that the connections are safely designed.

ITEM NO. 1.4

SDCC Opinion:

A more generous provision should be provided for the main east-west pedestrian and cyclist route through the site, facilitating a link to the east with a safe, comfortable and open character.

Applicant's Response:

The proposed development now provides for a separate cycle lane to the north of the main road through the site and a pedestrian path to the south of the main road through the site. This separate provision of these two paths will facilitate ample amounts of space for both pedestrians and cyclists travelling to and through the site. Again, we emphasise that the proposed layout has been subject to a Quality Audit and Road Safety Audit by PMCE (which is submitted under separate cover) which helped to inform the final design and ensured the design was of the highest quality from the perspective of more vulnerable users and encourages cycling and walking as the mode of transport. For further detail the Council is invited to refer to the drawings and reports submitted as part of the final planning application.

ITEM NO. 1.5

SDCC Opinion:

Landscape and Visual Impact Assessment should be submitted including photomontages and CGI's which show the entire scheme and accurately depict the proposals.

Applicant's Response:

As part of the final planning application pack, Digital Dimensions prepared a range of verified photomontages and also CGI's, which enable an assessment of the visual impact of the proposed development. It is evident that the transition in scale and height of the development is consistent with the Local Planning Framework for Clondalkin and in keeping with the expected scale for this brownfield site within the town centre.

ITEM NO. 1.6

SDCC Opinion:

A revised Social Infrastructure Audit providing details on current capacity/no. of spaces available within the 18no. existing creche facilities within a 2km radius of the proposed development site. A creche to serve the childcare need of the proposed development of 43no. spaces should be provided and evidence of thorough consultation with the South Dublin Childcare Committee submitted along with floor plans and the proposed design, usability and boundary treatments of the open space for the creche.

Applicant's Response:

The Council is invited to refer to the updated and revised Community and Social Infrastructure Audit, prepared by DOWNEY submitted under separate cover. This Audit concludes that the proposed development would generate a demand for up to 13 no. childcare spaces. While the Audit found potential capacity of 16 no. spaces in the wider area. The applicant is still proposing a childcare facility at ground level of Block 1 within the development. This facility will extend to c. 350 sq.m. and cater for 31 no. children.

Prior to the lodgement of this application the design team has had thorough discussions with South Dublin Childcare Committee which have resulted in the Committee being happy with the design and layout of the internal and outdoor areas proposed for the creche. The Council is invited to refer to the proposed creche drawings, prepared by O'Mahony Pike Architects for further detail.

ITEM NO. 1.7

SDCC Opinion:

Inactive facades and material treatment of facades should be reconsidered as per the recommendations in this report. Revised floor plans and updated CGIs showing same should be submitted.

Applicant's Response:

The façades of the proposed building blocks have been reconsidered and redesigned as part of the final planning application. The proposed facades and materiality has been informed by the built heritage of Clondalkin including structures within and the emerging townscape and the three local Architectural Conservation Areas. A refined palette is proposed incorporating select brick and render facades which allude the architectural heritage of the area while delivering a modern residential development at an appropriate scale given the town centre location and proximity to surrounding transport links.

For Further details, the Planning Authority are invited to refer to OMP's Design Statement, which is included under separate cover as part of this application.

ITEM NO. 1.8

SDCC Opinion:

Revised, clear and coherent Housing Quality Assessment and Schedule of Accommodation are required. These should demonstrate full compliance with the relevant guidelines. The applicant should satisfy themselves that they are complying with the most relevant Apartment guidelines at the time of making an application.

Applicant's Response:

A revised Housing Quality Assessment and Schedule of Accommodation have been prepared by O'Mahony Pike Architects as part of the final planning application. These confirm that the proposed development is consistent with the latest apartment guidelines (*Design Standards for Apartments Guidelines for Planning Authorities 2025*).

ITEM NO. 1.9

SDCC Opinion:

Updated sunlight and daylight assessment is required to account for any design changes. The applicant should provide reasonable justification for the 2no. areas of proposed open space that do not meet the Sun on Ground daylight requirements.

Applicant's Response:

Section 8.1 (Sunlight to Amenity within the Proposed Development) of Digital Dimensions Daylight and Sunlight Assessment, confirms that the proposed development complies with the BRE Guide in terms of sunlight to amenity areas. It is noted that while the communal area of open space at ground level of Block 2 is below the standard, a new area of communal open space has been provided at roof level on the block in order to ensure that residents of the block are able to enjoy a quality amenity space. This additional space is fully consistent with the BRE Guide.

A small area of public open space is provided to the north of Block 2 and given its location on the site and proximity to Block 2, it does not enjoy good levels of sunlight. However, this is merely one area of public open space, and it is important to note that the main area of public open space that is located in the centre of the site, is compliant with the BRE Guide.

As noted above, while there are some areas, which in themselves do not have high levels of sunlight, each block has an area of communal open space with high levels of sunlight. Overall, the proposed development meets the recommendations for sunlight in the BRE Guidelines BR209:2022. This is appropriate for a town centre zoned brownfield site that is able to accommodate a relatively high-density development. We note that the provision of overhead powerlines, with their accompanying wayleave, running through the centre of the site have placed a significant constraint on the site, which has dictated the layout of the site to a significant degree.

ITEM NO. 1.10

SDCC Opinion:

Revised Architectural Design Statement to show how the 8 key principles underpinning 'The Plan Approach' has been taken into consideration within the proposed design, and reconsider the design as necessary to incorporate any revisions required to meet this approach.

Applicant's Response:

The Council is invited to refer to Chapter 3 of the revised Architectural Design Statement, prepared by O'Mahony Pike Architects which analyses the design and its consistency with the 8 key principles underpinning 'The Plan Approach' as set out in the County Development Plan.

ITEM NO. 1.11

SDCC Opinion:

The applicant should detail compliance with the relevant policies and objectives of the Clondalkin Local Planning Framework as well as include details of how the scheme will integrate and reflect the historic Clondalkin Village.

Applicant's Response:

The Council is invited to refer to the Planning Statement, prepared by DOWNEY, which details how the proposed development complies with the relevant policies and objectives of the Clondalkin Planning Framework and how the development integrates with the historic Clondalkin Village. This is also supported by the Design Statement, prepared by OMP which also illustrates the consistency between them.

At a high level, a comparison between the indicative layout within the LPF (Figure 1 below) and the proposed site layout Plan (Figure 2 below), shows the similarity between both. The main urban form and layout are consistent in their approach, with the central area of open space running east-west through the site and acting as a green link from Ninth Lock Road to Riversdale in the east. The proposed development also facilitates future connectivity beyond the site, such as with the cycle path to the east as well as potential future cycle, pedestrian or road connections to the north and the south, which could connect with any future redevelopment of the adjoining sites. The overall heights and density proposed as well as land uses are also consistent.

The main east-west link of the proposed development provides for active ground floor spaces with the childcare facility and also own-door units providing activity along this key corridor.

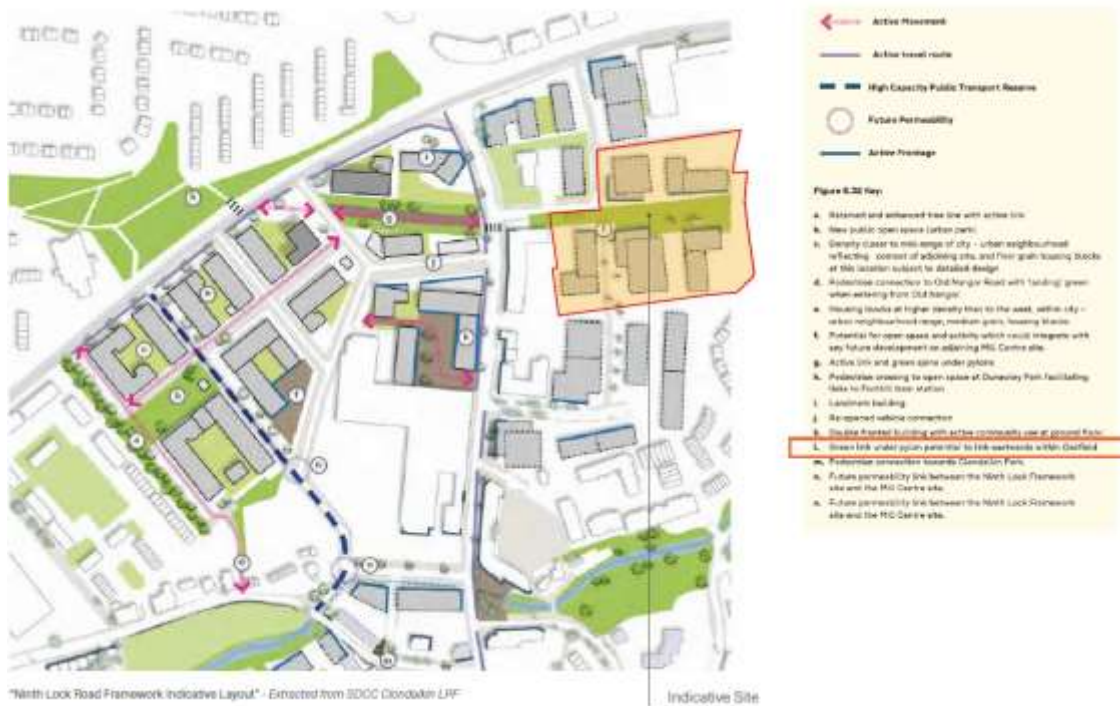


Figure 1 – Extract of Indicative Layout from the Clondalkin LRF



Figure 2 – Proposed Layout/Massing of the proposed development with indicative connectivity also shown.

In relation to its integration with the historic village, this is set by the wider design approach, including the transition in scale of the buildings and the materials proposed for the facades, which reflects the built heritage of Clondalkin.

ITEM NO. 1.12

SDCC Opinion:

The applicant should provide calculations and breakdown of the public open space within the proposed site area, displaying compliance with Table 12.11 and COS5 Objective 4, 5 and 6 of the South Dublin Development Plan 2022-2028.

Applicant's Response:

The proposed development provides for a total of 3,648 sq.m. of public open space, which equates to 16% of the site area. This exceeds the required 10%, which the Development Plan requires to be provided in new residential developments on other zoned sites. These areas are indicated in Figure 3. Area 1 measures 1,748 sq.m. and Area 2 measures 1,720 sq.m. (A total of 3,648 sq.m. of public open space). This equates to 16% of the site area.

The objective to deliver 2.4 hectares of public open space per 1,000 of population would necessitate approximately 2.7 hectares of open space to be provided. This is not sustainable on an existing brownfield site within the town centre. In light of this and noting that the applicant is provided more than the required quantum of on-site open space, it is submitted that a development contribution towards public open space would be more appropriate in this instance. This is consistent with Policy and Objective 5.1 of the Sustainable Residential and Compact Settlement Guidelines.

ITEM NO. 1.13

SDCC Opinion:

The applicant should ensure compliance with the relevant standards for communal amenity space overall, and block by block.

Applicant's Response:

The overall development is provided with a total of 3,100 sq.m. of Communal Open Space. This greatly exceeds the requirement to provide 1,979 sq.m. when measured against the mix of units. The overall distribution of open space is indicated in Figure 3 below.



Figure 3 – Layout of Open Space in the development

On a Block-by-Block basis, the provision is measured against the required level per block as follows and confirms that the scheme provides the correct quantum of communal open space for each block as well as cumulatively.

Block 1				
Required	Studios	1 beds	2 beds	Total
Required per unit	4	5	6	
No. of units	0	32	32	64
Total Required	0	160	192	352
Total Provided				360

Block 2				
Required	Studios	1 beds	2 beds	Total
Required per unit	4	5	6	
No. of units	24	54	36	114

Total Required	96	270	216	582
Total Provided				740

Block 3				
Required	Studios	1 bed	2 beds	Total
Required per unit	4	5	6	
No. of units	0	68	44	112
Total Required	0	340	264	604
Total Provided				690

Block 4				
Required	Studios	1 beds	2 beds	Total
Required per unit	4	5	6	
No. of units	0	76	37	113
Total Required	0	380	222	602
Total Provided				765

ITEM NO. 1.14

SDCC Opinion:

The proposed development shall have to deliver an adequate quantum of public open space as per County Development Plan policy, and in calculating this quantum the applicant must be clear in excluding those areas that have already been counted towards provision on other sites, i.e. that double-counting is not taking place. The applicant should demonstrate compliance with all relevant standards in the County Development Plan, including the relevant special local objectives, the on-site requirements in Table 8.1 of the Plan, and the requirement to deliver 2.4 ha. of public open space per 1,000 of population, on or off-site as per the requirements of the County Development Plan.

Applicant's Response:

The proposed development provides for a total of 3,648 sq.m. of public open space, which equates to 16% of the site area. This exceeds the required 10%, which the Development Plan requires to be provided in new residential developments on other zoned sites.

The objective to deliver 2.4 hectares of public open space per 1,000 of population would necessitate approximately 2.7 hectares of open space to be provided. This is not sustainable on an existing brownfield site within the town centre. In light of this and noting that the applicant is provided more than the required quantum of on-site open space, it is submitted that a development contribution towards public open space would be more appropriate in this instance. This is consistent with Policy and Objective 5.1 of the Sustainable Residential and Compact Settlement Guidelines.

ITEM NO. 1.15

SDCC Opinion:

Green Space Factor - The applicant shall submit a GSF calculation detailing how they have achieved the appropriate minimum Green Space Factor (GSF) scoring established by their land use zoning. This is to be accompanied by a green infrastructure map detailing all existing and proposed green infrastructure features on site and the surrounding area.

Applicant's Response:

The Council is invited to refer to the Green Infrastructure Plan, prepared by Austen Landscape Architects and Appendix 1 of their report, which provides a detailed breakdown of the Green Space Factor (GSF) for the site. A Green Space Factor score of 0.54 has been achieved, which exceeds the target of 0.5.

ITEM NO. 1.16

SDCC Opinion:

Details of play spaces - The playspace shall adhere to the guidelines set out in SDCC's Play Policy. 1 LAP and 2 LEAPS are required for 415 residential units.

Applicant's Response:

In the first instance, we wish to advise that the proposed development being submitted is for 408 no. units and not 415, which was previously submitted for the Pre-Application stage.

The main area of public open space is located in the centre of the subject site. Within this space, it is proposed to provide 2 play areas, incorporating a range of play equipment for children. The play area has been designed based on the principle of natural play. It will be easily accessible to all residents and visitors to the site and is very well supervised in terms of passive surveillance. We note that this space is also indicated as being proposed to be Taken in Charge by the Council.

The Council is invited to refer to Landscape Plan (DWG No. LP-01), prepared by Austen Landscape Architects which displays the allocated playspaces for the reduced rate of 408 residential units.

ITEM NO. 1.17

SDCC Opinion:

Response to recommendations of Roads, Parks, Water Services, and Uisce Éireann.

Applicant's Response:

The requests of all sections of the Council and Uisce Éireann have been addressed throughout this report and across the various reports, plans and documentation that are submitted with the application. In summary we note the following:

Roads

The quantum of car parking has increased since the Pre-Application Consultation. Cycle parking provision has also dramatically increased. Furthermore, while car parking numbers have increased,

the quantum of parking on the main street has decreased and the design and materials used for the parking spaces are more appropriate.

The layout is also consistent with the Clondalkin LFP and can connect to adjoining lands, as indicated within the LFP.

Water Services

The proposed development is fully compliant with the SUDS approach, and a Surface Water Management Strategy has been prepared by GK Consulting Engineers and submitted under separate cover.

A detailed Site-Specific Flood Risk Assessment, including Justification Test has been prepared by McCloy Consulting and is submitted under separate cover. This sets out why the proposed development is appropriate for the site.

Parks

The quality and quantum of communal and public open space has been refined and justified. The overall quantum of public open space measures 16% of the site area, while each block contains the required quantum of communal open space. The open space areas also benefit from sunlight consistent with the BRE Guide.

Uisce Eireann

The Confirmation of Feasibility is included with this application, and the proposed drainage design and layout is consistent with the requirements of Uisce Eireann. The Planning Authority are invited to refer to the drawings and reports from GK Consulting Engineers for more details.

SECTION 2.0: 32D – SPECIFIC INFORMATION REQUIRED FOR LODGEMENT

The following section is specific information that the South Dublin County Council request is submitted alongside the future planning application for this proposed development:

ITEM NO. 2.1

Updated Development Statistics Table/Schedule of Accommodation to include all items (Table 1 of this report).

Applicant's Response:

O'Mahony Pike Architects have prepared an updated Schedule of Accommodation which is submitted under separate cover. The details in Table 1 are also set out in DOWNEY's Planning Report and included below for convenience.

Key Statistics of Proposed Development

The table below gives an overview of the key data of the proposed development. Further details are available in the Schedule of Accommodation by OMP Architects.

Total Red Line Area:	2.66 Ha
Total Ownership Boundary Area	2.3 Ha
Units	408
Studio	24 (6%)
1-bed units	230 (56%)
2-bed units	149 (37%)
3-bed units	5 (1%)
Dual Aspect	180 units (44%)
Density	185dph (net)
Car Parking Spaces	202
Bicycle Parking Spaces	752
Motorbike Parking Spaces	2
Plot Ratio (Gross Site Area)	1.17
Plot Ratio (Net Site Area)	1.41
Site Coverage (Gross Site Area)	30.3%
Site Coverage (Net Site Area)	36.6
Part V Units	82 units
Public Open Space	3340qm
Non-Residential Uses	1 no. childcare facility (350 sq.m.)

Table 1: Proposed Development Details.

ITEM NO. 2.2

Housing Quality Assessment, to include full details of:

- a. Unit floor areas.
- b. Private and communal amenity space
- c. Single and dual aspect units
- d. Provision of storage
- e. Demonstration of units which exceed minimum standards by 10%.

Applicant's Response:

O'Mahony Pike Architects have prepared a Housing Quality Assessment which includes the items listed above. This assessment complies with the South Dublin County Development Plan 2022-2028, the 2023 Guidelines on Design Standards for New Apartments and the 2024 Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (the 'Compact Settlement Guidelines').

ITEM NO. 2.3

Schedule of Accommodation (including accurate calculations of the public open space on site).

Applicant's Response:

O'Mahony Pike Architects have prepared Schedule of Accommodation which includes all items requested by the Council.

ITEM NO. 2.4

Updated Site Layout Plan with amended red line boundary to account for changes requested.

Applicant's Response:

O'Mahony Pike Architects have prepared a revised red line boundary around the site. We note that as outlined earlier, the red line does not include the road to the west. However, it does include lands to the north and the New Nangor Road where services will be provided.

ITEM NO. 2.5

Architectural Design Statement, to include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan)

Applicant's Response:

The Council is invited to refer to Chapter 3 of the revised Architectural Design Statement, prepared by O'Mahony Pike Architects which analyses the design and its consistency with the 8 key principles underpinning 'The Plan Approach' as set out in the County Development Plan.

ITEM NO. 2.6

Visual Impact Assessment with CGIs and photomontages of development with views to include any modification to same as per other request/s.

Applicant's Response:

As part of the final planning application pack, Digital Dimensions prepared a range of verified photomontages and also CGI's, which enable an assessment of the visual impact of the proposed development. It is evident that the transition in scale and height of the development is consistent with the Local Planning Framework for Clondalkin and in keeping with the expected scale for this brownfield site within the town centre.

ITEM NO. 2.7

Public Open Space layout plan which accurately details the proposed public open space on site and requested changes.

Applicant's Response:

Austen Landscape Architects have prepared a revised Landscape Masterplan which details the proposed public open space on the site, following the changes made following the 32D Pre-Planning Consultation.

ITEM NO. 2.8

Green Infrastructure Plan and details of the impacts of the proposed development on GI on site.

Applicant's Response:

Austen Landscape Architects have prepared a Green Infrastructure Plan, which is included under separate cover.

ITEM NO. 2.9

Green Space Factor Calculations.

Applicant's Response:

The Council is invited to refer to the Green Space Factor in Appendix 1 of the Design Statement, prepared by Austen Landscape Architects which outlines the Green Space Factor Calculation for the site. The Green Space Factor for the site provides the required amount of 0.54, which is in compliance with South Dublin Development Plan 2022-2028.

ITEM NO. 2.10

Street Tree Planting Plan.

Applicant's Response:

The Council is invited to refer to the landscape plans and Design Statement, prepared by Austen Landscape Architects which displays the street tree planting plan for the overall site.

ITEM NO. 2.11

Landscape Scheme, to include:

- a. *Landscape Masterplan to include all requested change.*
- b. *Detailed cross Sections/Elevations through the landscape proposals,*
- c. *Planting plan:*
 - i. *Location of species, types of plants, planting sizes and proposed numbers/densities,*
 - ii. *Implementation timetables,*
 - iii. *Proposals for future maintenance/management.*

Applicant's Response:

The Council is invited to refer to the landscape plans and Design Statement, prepared by Austen Landscape Architects which display all of the items requested by the Council above.

ITEM NO. 2.12

Tree Management Plan to include:

- a. *Pruning and maintenance schedule*
- b. *Protection measures*
- c. *Monitoring and reporting*
- d. *Emergency response plan.*

Applicant's Response:

The Council is invited to refer to the landscape plans and Design Statement, prepared by Austen Landscape Architects and the Arborist Report by Charles McCorkell Arboricultural Consultancy which outlines a detailed Tree Management Plan.

ITEM NO. 2.13

Tree and Hedgerow Protection Plan

Applicant's Response:

We note that the vegetation along the eastern boundary is proposed for removal to accommodate the development and noting the low value they have scored. However, significant replacement planting is proposed, and the replacement planting will be significantly more than the existing level of vegetation on the site, such that the overall Green Space Factor will be higher and the bio-diversity net gain is significant. The Planning Authority are invited to refer to the landscape plans for further details.

ITEM NO. 2.14

Tree and Hedgerow Removal Plan

Applicant's Response:

The Council are invited to refer to the 250917-P-11 (Tree Removals Plan), prepared by Charles McCorkell Arboricultural Consultancy submitted as part of the application.

ITEM NO. 2.15

Arborists Report

Applicant's Response:

An Arborist Report has been prepared by Charles McCorkell Arboricultural Consultancy submitted as part of the application.

ITEM NO. 2.16

Details of play space as requested which includes standard, accessible, and inclusive equipment as well as natural play elements.

Applicant's Response:

The Council is invited to refer to the revised Design Statement, prepared by Austen Landscape Architects which details the proposed play spaces for the overall development.

ITEM NO. 2.17

Road and Site Layout Plans which comply with the following requirements:

- *All link roads throughout the site are to be tied in to existing roads to match existing conditions such as road finishes, permeable paths and grass verges.*
- *All roads layouts are to align with the final draft of the Clondalkin LFP.*
- *All permeable measures and cycle routes shall align with the approved Clondalkin LFP.*

Applicant's Response:

All link roads throughout the site can tie into existing roads. In this regard, there is actually only a single road (to the west) that is currently in place. To the north there is undeveloped space behind the supermarket, both GK Consulting Engineers have ensured that the road levels will allow for a connection to the north. Furthermore, to the south is existing industrial/commercial buildings, but no public road. However, a potential tie-in can be provided south of Block 4.

The road and site layout plan aligns in as far as possible with the Clondalkin LFP, noting that the LFP only provides for an 'indicative layout' and as such detailed design is not available. However, and importantly, the proposed development can integrate to the surrounding lands to the north, east, south and west.

The main pedestrian and cycle route through the site is the east-west route, which will connect west from the Ninth Lock Road to Riversdale to the east. This is fully consistent with the Clondalkin LFP.

ITEM NO. 2.18

The minimum width of footpaths shall reflect the status of this site as a town centre site with a likely high level of usage and need to aid mobility impaired users.

Applicant's Response:

The footpaths are all capable of facilitating a high level of usage and are fully DMURS compliant. A DMURS Statement of Consistency has been prepared by GK Consulting Engineers, and a Quality Audit of the proposed development has been prepared by PMCE, both of which are submitted under separate cover.

ITEM NO. 2.19

A robust traffic analysis for the area.

Applicant's Response:

PMCE have prepared a detailed Traffic and Transport Assessment (TTA) for the proposed development, which is submitted under separate cover. This confirms that the nearby road network will operate within capacity after the development.

ITEM NO. 2.20

Stage 1 & 2 Road Safety Audit.

Applicant's Response:

A Road Safety Audit has been completed and prepared by PMCE and is submitted under separate cover.

ITEM NO. 2.21

- a. A layout of not less than 1:200 scale showing the location and number of parking spaces to be provided at the development. Please refer to Table 12.25 and 12.26: Maximum Parking Rates – from the SDCC County Development Plan 2022-2028.*
- b. The applicant shall relocate the perpendicular car parking from the main - east-west link street.*

Applicant's Response:

The Revised Site Layout Plan, by OMP Architects, shows the location of surface level car parking spaces. A total of 203 no. spaces are provided through the development. 62 no. of these spaces are within an undecroft level car park at Block B4. It is noted that the level of car parking on the main east-west road has been significantly reduced from what was proposed at the Pre-Application Stage. However, some parking is still necessary here to accommodate the development and provide convenient parking to the northern blocks in particular.

ITEM NO. 2.22

A revised layout of not less than 1:200 scale showing the location and number of Bicycle parking spaces to be provided at the development. Please refer to Table 12.23: Minimum Parking/Storage Rates – from the SDCC County Development Plan 2022-2028.

Applicant's Response:

The Revised Site Layout Plan, by OMP Architects, shows the number of bicycle parking spaces proposed. A total of 752 no. parking spaces are now proposed, which is significantly higher than what was previously proposed at the Pre-Application stage. This total includes long-stay secure parking spaces, cargo bike spaces and short-stay spaces.

ITEM NO. 2.23

Details of all items to be taken in charge.

Applicant's Response:

OMP Architects have prepared a taken in charge drawing (DWG No. 25018-OMP-00-XX-DR-A-1030) which shows all the areas proposed to be taken in charge. The areas would be the roads, footpaths and public open spaces as well as services. The Planning Authority are invited to refer to the drawing for more details.

ITEM NO. 2.24

Details of how the refuse collection service will operate.

Applicant's Response:

AWN Consulting have prepared an Operational Waste Management Plan, which is submitted under separate cover and outlines how refuse shall be collected. The development will be serviced by standard refuse vehicles with an appropriate quantum of refuse stores located within the blocks. Auto-tracking drawings by GK Consulting Engineers has been carried out and confirms that manoeuvrability for refuse vehicles is readily available.

ITEM NO. 2.25

Revised layout of not less than 1:200 scale, showing a swept path analysis drawing (i.e. AutoTRAK or similar) demonstrating that fire tenders and large refuse vehicles can access/egress the site.

Applicant's Response:

Auto-tracking drawings by GK Consulting Engineers has been carried out and confirms that manoeuvrability for refuse and fire tender vehicles is readily available.

ITEM NO. 2.26

Prior to commencement a Public Lighting Design for the development must be submitted and agreed by the South Dublin County Council Lighting Department.

Applicant's Response:

Public Lighting design and report has been prepared by Lawlor Consulting, and an appropriately worded condition can be attached to a permission that requires a compliance agreement on lighting to be agreed with the Lighting Department.

ITEM NO. 2.27

SUDs Strategy, to include:

- a) *SUDs Design details. Note, sedum roofs are not preferable to the Planning Authority in the interest of biodiversity.*
- b) *Flow route analysis for site.*
- c) *Comprehensive surface water conveyance plan for the site.*
- d) *Drawing showing how much surface water is attenuated in m3.*
 - i. *Underground attenuation should be omitted.*
- e) *Revised report showing surface water attenuation calculations for proposed development.*
- f) *If underground tanks present, why these cannot be excluded from the design.*
- g) *SUDs Layout identifying the different types of SUDs features.*
- h) *Demonstrate adherence to SDCC SUDs guidance.*
- i) *Drawing showing plan and cross-sectional views of all SuDS features.*
- j) *Attenuation from green/blue roofs if proposed should be demonstrated.*

Applicant's Response:

GK Consulting Engineers have prepared a Surface Water Management Strategy Report, which is submitted under separate cover. This outlines in full the response to the items listed by the Planning Authority. We note that a full SUDS design has been undertaken, including detention basins, green/blue roofs and similar approaches. Proposed Surface Water & SUDS Layout Plan, Site Suds Overland Flow Systems, Site SUDS Layout Catchment Areas and Proposed SUDS Details have also been prepared by GKCE. The Planning Authority are invited to refer to this report, engineering drawings along with the landscape drawings, which are coordinated with this approach, for further details.

ITEM NO. 2.28

Surface water layout drawing

Applicant's Response:

A 'Proposed Surface Water & SUDS Layout Plan' has been prepared by GK Consulting Engineers (DWG NO. C101) and is submitted under separate cover.

ITEM NO. 2.29

Surface water attenuation calculations including drawings and details as requested by the Surface Water department.

Applicant's Response:

This is detailed in GK Consulting Engineers Surface Water Management Strategy Report, which is submitted under separate cover.

ITEM NO. 2.30

Attenuation plans and details

Applicant's Response:

This is detailed in GK Consulting Engineers Surface Water Management Strategy Report and Proposed SUDS Details drawings (C107 and C108) for details.

ITEM NO. 2.31

Drawing in plan and cross-sectional view to show what the size and slope of swales are.

Applicant's Response:

The Planning Authority are invited to refer to GK Consulting Engineers Proposed SUDS Details drawings (C107 and C108) for details.

ITEM NO. 2.32

Drawing to show where road gullies are relative to tree pits. Road gullies should not be in front of tree pits.

Applicant's Response:

The Planning Authority are invited to refer to GK Consulting Engineers Proposed SUDS Details drawings (C107) for details.

ITEM NO. 2.33

SUDS Management Plan.

Applicant's Response:

GK Consulting Engineers have prepared a Surface Water Management Strategy Report, which is submitted under separate cover.

ITEM NO. 2.34

Flood risk mapping and Assessment.

Applicant's Response:

McCloy Consulting Ltd. have prepared updated Flood risk mapping and Assessment for submission of the final planning application. This confirms that the site is suitable to provide residential development, in line with what is proposed.

ITEM NO. 2.35

Confirmation of Feasibility from Uisce Éireann.

Applicant's Response:

The applicant has obtained a Confirmation of Feasibility from Uisce Éireann for the provision of 415 residential units and 1 no. childcare facility on the subject site. This is submitted under separate cover as part of the application.

ITEM NO. 2.36

Appropriate Assessment Screening Report

Applicant's Response:

Altamar have prepared an Appropriate Assessment Screening Report in support of the final planning application, which is attached under separate cover. This confirms that a full NIS is not required for the development and the development will not result in any impact on a European Site.

ITEM NO. 2.37

EIA Screening Report

Applicant's Response:

DOWNEY have prepared an EIA Screening Report in support of the final planning application, which is attached under separate cover. This confirms that the development does not require a EIA to be prepared for the development.

ITEM NO. 2.38

Ecological Impact Assessment (EclA).

Applicant's Response:

Altamar have prepared an Ecological Impact Assessment in support of the final planning application, which is attached under separate cover.

ITEM NO. 2.39

Updated Bat Survey (as required)

Applicant's Response:

Altamar have prepared an updated bat survey for the final submission of the application, which is attached to the EclA. This has been submitted under separate cover.

ITEM NO. 2.40

Updated Community and Social Infrastructure Audit, to include current capacity of nearby creches.

Applicant's Response:

The Council are invited to refer to the updated Community and Social Infrastructure Audit, prepared by DOWNEY which includes the current capacity of creches surrounding the proposed development.

ITEM NO. 2.41

Part V Proposals.

Applicant's Response:

The applicant and their agent has engaged with the Housing Section for the purposes of Part V. The Part V proposals are submitted as part of the application, including indicative costings and drawings. A Letter of Validation from the Housing Section is also submitted.

ITEM NO. 2.42

Phasing strategy.

Applicant's Response:

In terms of phasing, the approach would be for the scheme to be built in 2 phases with Blocks 1 & 2 being in the first phase, along with the main access road and open space, and Phase 2 being Blocks 3 and 4.

ITEM NO. 2.43

An updated Construction and Environmental Management Plan to include a developed Construction Traffic Management Plan.

Applicant's Response:

AWN Consulting Limited have prepped a Construction and Environmental Management Plan, that includes a developed Construction Traffic Management Plan.

ITEM NO. 2.44

Public Lighting Design.

Applicant's Response:

Lawler Consulting have provided an Outdoor Lighting Report and a Lighting Layout, which is submitted under separate cover as part of this application. The Planning Authority are invited to refer to this for full details.

ITEM NO. 2.45

Daylight/Sunlight Assessment.

Applicant's Response:

Digital Dimensions have provided a Daylight & Sunlight Assessment in support of the final planning application, which is attached under separate cover. This confirms that the proposed development is consistent with the BRE Guidance Document.

3.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Statement of Response to LRD Opinion on behalf of our client and the applicant, Thornmeadow Developments Limited, to accompany a proposed Large-scale Residential Development (LRD) on lands at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22.

The proposals incorporated into the final scheme are considered to result in a high-quality development being presented to South Dublin County Council for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for a Large-scale Residential Development on lands at Elmfield, Ninth Lock Road, Clondalkin, Dublin 22.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.