



**THORNTON O'CONNOR**  
TOWN PLANNING

# **Response to Dublin City Council's LRD Opinion**

**In Respect of a Planning Application  
for a Large-Scale Residential  
Development at Milltown Park,  
Sandford Road, Dublin 6**

**Prepared on Behalf of**

**Sandford Living Limited**

December 2025

## CONTENTS

<b>1.0</b>	<b>INTRODUCTION.....</b>	<b>1</b>
1.1	SUMMARY OF DEVELOPMENT.....	1
<b>2.0</b>	<b>RESPONSE TO THE DUBLIN CITY COUNCIL OPINION.....</b>	<b>3</b>
2.1	PLANNING CONSIDERATIONS .....	3
2.2	TRANSPORT PLANNING DIVISION.....	5
2.3	DRAINAGE – SURFACE WATER MANAGEMENT .....	9
2.4	ARCHAEOLOGY .....	10
2.5	CONSERVATION .....	11
2.6	PARKS.....	14
<b>3.0</b>	<b>CONCLUSION .....</b>	<b>18</b>

## 1.0 INTRODUCTION

On 17<sup>th</sup> July 2025, Thornton O'Connor Town Planning on behalf of Sandford Living Limited submitted a pre-application LRD consultation request to Dublin City Council. The purpose of this document is to provide a summary response to the specific information requested by Dublin City Council in their Notice of LRD Opinion (Ref. LRD6093/25-S2) received on 8<sup>th</sup> September 2025, further to a meeting held on 12<sup>th</sup> August 2025 with Dublin City Council and the Applicant/Design Team.

This Notice states that it is the Planning Authority's determination that the documents submitted with the request to enter into consultations constitutes a reasonable basis for an application for Large-Scale Residential Development subject to certain issues/areas to be addressed by the Applicant and Design Team. The key issues /areas that must be addressed in any future application are provided below.

This Statement of Response has been drafted based on insights provided by the plans and particulars prepared by the Applicant and the wider Design Team. Therefore, this report **must** be read in tandem with these materials.

## 1.1 SUMMARY OF DEVELOPMENT

The full description of the proposed development, as described in the Statutory Notices, is as follows:

*"Sandford Living Limited intend to apply for permission for a Large-Scale Residential Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, Do6 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.*

*The development will principally consist of: the demolition of c. 4,847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2,031 sq m), the Finlay Wing (622 sq m), the Archive (1,240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units).*

*Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3*

*No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.*

*The development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1,698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).*

*The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries; bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.*

*The proposed development has a gross floor space of c.50,196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10,550 sq m, which includes parking spaces, bin storage, bike storage and plant."*

## 2.0 RESPONSE TO THE DUBLIN CITY COUNCIL OPINION

	Item to be Addressed	Response
<b>2.1 PLANNING CONSIDERATIONS</b>		
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Submit revised drawings for Block E addressing the Planning Authorities concerns with regard to the size of the rear garden and appropriate screening to this open space to provide adequate privacy.</p>	<p>We acknowledge the Planning Authority’s concerns regarding the size and privacy screening of the rear gardens for Block E and have significantly revised the design to address these points fully.</p> <p><b><i>Garden Size and Context</i></b></p> <p>The revised site layout and garden design, detailed on the submitted drawings demonstrate the following:</p> <p><b>Maximised Area:</b> The rear gardens have been maximised in size to the greatest extent possible, consistent with the overall site layout and providing an appropriate and functional amenity space for the residential units.</p> <p><b>Tree Retention:</b> The design has carefully considered the location of all existing mature trees, and the garden boundaries have been drawn to accommodate and protect these valuable existing specimens, ensuring the revised garden areas integrate seamlessly with the established landscape context. The size achieved represents the optimal balance between providing private amenity space and respecting the existing ecological features.</p> <p>To ensure adequate privacy for these open spaces, a comprehensive screening solution has been incorporated, as shown in the updated elevations and landscaping plans. The height and specification of the screening is designed to exceed the minimum requirements for residential privacy, ensuring a secluded and comfortable environment for future residents.</p> <p>The area behind the rear gardens of Block E is a biodiversity corridor and there is only a mown pathway through this zone so will not be heavily used by the residents</p>

		<p>so as not to impact the privacy or the natural habitat. This area is not included in the POS or COS calculations for that reason.</p> <p>We are confident that these revisions address the Planning Authority's concerns, providing rear gardens of appropriate size and ensuring robust, effective screening to deliver adequate privacy for all Block E units.</p> <p>Overall the Block E houses each have a back garden measuring 42.7 sq m and a first floor terrace measuring 22.5 sq m, providing a total private amenity space of 65.2 sq m, a significant quantum for a 3 No. bedroom house.</p> <p>The rear gardens of Block E will be enclosed by a 1.8 m-high timber fence, which will provide privacy between adjacent properties and security in relation to the nearby open space. Details of the proposed fence can be found in the <i>Landscape Design and Access Statement</i> prepared by Cameo And Partners.</p> <p>Please refer to Section 4.2 of the <i>Masterplan + Architectural Design Statement</i> prepared by OMP Architects for a comprehensive response to this item.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Submit further details for the retail, café and medical use, in relation to the location of the bin storage, signage, hours of operation and any ventilation required to deal with fumes and odours from cooking for the café.</p>	<p>Please refer to Section 4.5 of the <i>Masterplan + Architectural Design Statement</i> prepared by OMP Architects for a comprehensive response to this item.</p> <p>We note that the retail and medical uses have been removed from the scheme, with a café/restaurant proposed along with the Culture/Community space.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Ensure that the demolition justification report adequately <i>[sic]</i> sustainability in terms of embodied carbon in accordance with section 15.7.1 of the 2022-2028 Dublin City Development Plan.</p>	<p>Please refer to the <i>Justification for Demolition</i> report prepared by O'Connor Sutton Cronin, which details this issue in full.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Submit revised site layout plan with additional separation distances included.</p>	<p>Please refer to the Proposed Site Layout Plan prepared by OMP.</p>

<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Submit a Daylight and Sunlight Assessment in accordance with Appendix 16, section 4.0 of the 2022-2028 Dublin City Development Plan.</p>	<p>Please refer to the <i>Daylight and Sunlight Assessment Report</i> prepared by 3D Design Bureau.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Submit a revised HOA including compliance with private and communal open space.</p>	<p>Please refer to the <i>Housing Quality Assessment</i> prepared by OMP.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Demonstrate that all units comply with housing/apartment guidelines.</p>	<p>Please refer to the <i>Housing Quality Assessment</i> prepared by OMP.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Submit all relevant supporting documents in accordance with Section 15.1 of the 2022-2028 Dublin City Development Plan should be submitted <i>[sic]</i>.</p>	<p>Please refer to Section 8.0 of the <i>Planning Report</i> prepared by Thornton O'Connor Town Planning, which details all of the drawings and reports submitted with this application, including an EIAR.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Clearly discuss compliance with CU025.</p>	<p>Please refer to Section 8.7 of the <i>Planning Report</i> prepared by Thornton O'Connor Town Planning.</p> <p>Whilst there is no longer a requirement to provide Culture/Community space on foot of SPPR 6 of the <i>Apartment Guidelines 2025</i>, the Applicant has retained this use in the scheme and it is provided in both Tabor House and the Chapel, the two retained buildings in the proposed development.</p>
<p><b>2.2 TRANSPORT PLANNING DIVISION</b></p>		
<ul style="list-style-type: none"> <li>•</li> </ul>	<p><b>Public Road</b></p> <p>a) A letter of consent to extend the redline boundary to facilitate the proposed works within the public road. The applicant is required to request a letter of consent form the Transportation Planning Division in Dublin City Council prior to the submission of a planning application.</p>	<p>Please see the Letter of Consent received by Dublin City Council relating to works proposed along Milltown Road and Sandford Road.</p>

	<p>b) An overlay illustration of the proposed Sandyford / Clonskeagh to Charlemont Street active travel scheme should be provided to clearly demonstrate that the proposed works to the public road are consistent with this scheme.</p>	<p>Please refer to DBFL's Roads Layout drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1201) and General Arrangement – Sandford Road to Eglinton Road Junction drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1202)</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p><b>Access</b></p> <p>a) A revised site layout drawing detailing an improved pedestrian route across the proposed 'forecourt' area in front of Tabor House by way of providing build outs or similar and kerbs raised to a minimum of 25mm along the route.</p> <p>b) All shared use routes through the site (i.e. access routes to the development used by pedestrians and cyclists), including the route to the north of Block C, should achieve a continuous minimum width of 3m.</p>	<p>Please refer to DBFL's Roads Layout drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1201) for revised forecourt design with improved pedestrian route. The area in front of Tabour House has been revised to consider vehicular movements as well as cyclist and pedestrian safety. The change in materials and the introduction of a raised kerb (25mm upstanding) in front of the building will help clarify pedestrian movements.</p> <p>Please also refer to drawing Co111 L100 and Co111 L1000 produced by Cameo and Partners for further details.</p> <p>Please refer to DBFL's Roads Layout drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1201) indicating 3 metre dimension on all shared surface routes.</p> <p>The main shared surface for pedestrians and cyclists is the route connecting Sandford Road to Milltown Road. In the northern section, cyclists share a 4.8 metre wide road occasionally used by service vehicles (taxis, emergency vehicles, deliveries) and closed off with controlled bollards. Between Blocks A and B, the shared surface narrows to 3 metres. The area north of Block C has been increased to 3 metres as requested.</p> <p>Please refer to drawings Co111 L100 and Co111 L1000 produced by Cameo and Partners for further details.</p>

	<p>c) Swept path analysis of vehicular access requirements for all proposed sub-stations should be provided.</p>	<p>Please refer to DBFL's Swept Path Analysis – ESB Appliance drawing (190226-X-04-Z00-DTM-DR-DBFL-CE-1209).</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p><b><u>Cycle Parking</u></b></p> <p>a) The applicant is requested to prepare a Bicycle Design Statement (BDS). The BDS should set out details as to how all bicycles can safely and with ease access the proposed cycle parking from the public road. Detailed drawings of all cycle parking areas should be included. It should be demonstrated that adequate height clearance, separation distance between racks and within internal access corridors is provided for ease of accessibility and functionality of the long term compounds, in accordance with the provisions of the Cycle Design Manual, 2023.</p> <p>b) Having regard to the guidance of the NTA Cycle Design Manual, 2023 and to the relevant provision of Section 3 and Table 1 of Appendix 5 of the Dublin City Development Plan, 2022-2028, the applicant is requested to provide details of the following amendments to the scheme with regard to cycle parking:</p> <ul style="list-style-type: none"> <li>i. An additional means of cyclist access to the basement from surface level should be provided (e.g. cycle lift).</li> <li>ii. The location and type of the 26no. spaces allocated to the community / childcare / commercial uses should be specified. Sufficient secure parking for staff should be identified.</li> </ul>	<p>Please refer to DBFL's <i>Bicycle Design Statement</i> (190226-X-90-X-XXX-RP-DBFL-CE-0003), outlining the proposed design for all the cycle infrastructure on-site.</p> <p>The layout and dimensions of the visitor cycle parking provided at ground level follow the best practice guidance set out in the Cycle Design Manual (2023).</p> <p>The proposed cycle stands across the landscape will be easily accessible via a 3 metre wide shared surface. Refer to DBFL drawings for further details.</p> <p>In general, the cycle parking locations have been revised to ensure more direct access to each cluster (i.e, the cycle stands in the park area have been reallocated closer to the access points of the green areas).</p> <p>i. Please refer to DBFL's Roads Layout drawing (190226-X-04-Z00-DTM-DR-DBFL-CE-1201), showing the location of the lift access for cyclists to the basement.</p> <p>ii. Please refer to DBFL's <i>Parking Strategy</i> (190226-XX-BK01-L01-RP-DBFL-CE-0002) for a breakdown of the parking spaces allocation across the site.</p> <p>iii. Please refer to the <i>Landscape Design and Access Statement</i> (pg. 83) produced by Cameo And Partners.</p> <p>iv. Please refer to DBFL's <i>Parking Strategy</i> (190226-XX-BK01-L01-RP-DBFL-CE-0002) for the breakdown of cycle parking provision for standard and non-standard bikes.</p>

	<ul style="list-style-type: none"> <li>iii. A breakdown of the location of all visitor cycle parking and quantity within each bank of stands / compounds.</li> <li>iv. A minimum of 5% of the total residential cycle parking provision should be of a type capable of accommodating non-standard / larger cycle parking equipment (e.g. cargo bikes, adaptive bikes, e-bikes).</li> <li>v. The cycle parking within the forecourts of each dwelling in Block E should be provided within a secure and covered facility.</li> </ul>	<p>v. Please refer to DBFL's Roads Layout drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1201) for the cycle parking arrangement at Block E.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p><b><u>Car Parking</u></b></p> <ul style="list-style-type: none"> <li>a) In accordance with section 5.0 of Appendix 5 of the Dublin City Development Plan, 2022-2028, at least 50% of car parking spaces should be equipped with fully functional EV charging infrastructure, with all remaining spaces ducted for future provision of EV infrastructure. The applicant is requested to demonstrate compliance with this requirement</li> <li>b) The design of Block E and associated landscaping / roadway to the front of the block allows for a substantial parking area within the curtilage of and to the front of each dwelling. Clear area sufficient to accommodate a maximum of 1no. parked car (i.e. 3m width and 5m length) should be provided for each dwelling, and the design of Block E should be revised accordingly.</li> </ul>	<p>Please refer to DBFL's <i>Traffic and Transportation Report</i> (190226-X-20-BK01-L01-RP-DBFL-CE-0001) for the development's layouts outlining compliance with this requirement.</p> <p>Please refer to DBFL's Roads Layout drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1201) with parking in front of Block E Courtyard Houses indicated. Please also refer to DBFL's Swept Path Analysis – Sheet 3 drawing (190226-X-04-Zoo-DTM-DR-DBFL-CE-1207) indicating a car manoeuvring in and out of driveways of Block E Courtyard Houses.</p>

		<p>The landscape design along the residential road has also been revised: car parking spaces are now shown within the curtilage, and soft landscaping has been maximised on the dwelling side to discourage on-street parking.</p> <p>Please refer to drawings Co111 L100 and Co111 L1000 and the <i>Landscape Design and Access Statement</i> produced by Cameo and Partners for further details.</p>
<b>2.3 DRAINAGE – SURFACE WATER MANAGEMENT</b>		
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>There are large discrepancies between the stated breakdowns of storage volume being provided and the roof supplier estimates. Bioretention areas and permeable paving are proposed but these do not appear to be utilised for storage. The use of SuDS elements should be maximised in accordance with DCC policies in this regard and suitably justified where unattainable.</p>	<p>DBFL attenuation volumes have been updated to align with the storage capacities provided by the green roof/blue roof supplier. Surface water runoff from the green and blue roof systems is flow-restricted to ensure activation of the available storage on the roof and podium areas. Likewise, runoff from the bio-retention areas is restricted to promote utilisation of the internal storage within these SuDS features. Surface water run-off from roofs of Block E Courtyard houses is directed to soakaway pits in the back gardens with overflows to the main drainage systems. This promotes infiltration and storage of surface water before discharging into the main network. Surface water runoff from permeable paving is stored within the stone layers below until saturated with overflows to conventional gullies.</p> <p>Please refer to DBFL’s Site Services Layout Drawing (190226-X-05-Zoo-DTM-DR-DBFL-CE-1301) and DBFL’s <i>Infrastructure Design Report</i> (190226-X-X-X-XXX-RP-DBFL-CE-0002) for more information on proposed surface water management and strategy.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>High ground water levels were noted and confirmation should be provided that the proposed storm tech system is viable (should it be necessary) given likely formation levels.</p>	<p>Please refer to Appendix G – Extracts from Site Investigation Report in DBFL’s revised <i>Infrastructure Design Report</i> (190226-X-X-X-XXX-RP-DBFL-CE-0002) which shows the location and depth of groundwater encountered for the boreholes across the site. Based on this site investigation, no proposed attenuation storage structures are situated in areas where high groundwater</p>

		levels were observed. Further investigations will be carried out at construction stage and impermeable liners will be used at the base and side of attenuation systems where required.
•	Connection to the public Surface Water (SW) sewer is generally not permitted until a development is near completion and all SuDS elements are in place. It is understood that the Construction Management Plan (CMP) will be detailed by the appointed contractor however the Preliminary CMP gives no indication of the proposed methodology for laying the new SW sewer on Eglinton Road, replacing the existing SW sewer. The Site Specific Flood Risk Assessment should include an assessment of this construction activity also.	Please refer to DBFL's revised <i>Preliminary Construction Management Plan</i> (190226-DBFL-XX-XX-RP-C-0004) and revised <i>Site-Specific Flood Risk Assessment</i> (190226-DBFL-XX-XX-RP-C-0003) which includes methodology and reference to construction of surface water outfall along Eglinton Road.
•	Phasing arrangements should ensure that each phase can manage its own surface water catchment area until such time as the final connection is granted.	Please refer to DBFL's Surface Water Catchment and Phasing Layout (190226- -05-Z00-DTM-DR-DBFL-CE-1304) indicating surface water catchments and aligning phasing arrangements.
•	Applicant is reminded that all SW infrastructure in the public road shall adhere to the Greater Dublin Regional Code of Practice for Drainage Works. Note in particular the requirements for manhole construction, pipe material and bedding.	All surface water infrastructure in the public road is designed in accordance with Greater Dublin Regional Code of Practice for Drainage Works.
<b>2.4 ARCHAEOLOGY</b>		
•	The archaeological assessment should be submitted to support their Stage 3 planning application.	Please see the accompanying Archaeological Assessment prepared by Archer Archaeology in Chapter 6 of the EIAR.
•	Further archaeological testing and/or monitoring will be recommended as a condition of any grant of permission.	Noted.

2.5 CONSERVATION	
<ul style="list-style-type: none"> <li>• The Applicant is requested to submit sufficiently detailed survey drawings (floor plans, sections, elevations) and a detailed photographic survey to fully convey all of the historic fabric that remains within and without the existing buildings.</li> </ul>	<p>A photographic record, Appendix 7.2, is attached to Chapter 7.</p> <p>OMP Architects have prepared survey drawings.</p>
<ul style="list-style-type: none"> <li>• A detailed salvage strategy for all sound historic fabric (floorboards and floor finishes, fixtures and fittings, panelling, joinery (skirtings, dado, casings, architraves etc.) window joinery, door casings and door joinery, stone, brick, ironwork, roof slates, timber boards, chimney pieces, tiles, staircases, garden features etc.) - not proposed to be retained - shall be submitted.</li> </ul>	<p>It is not intended to discard fabric scheduled for demolition, but to carefully review same for reuse within the retained buildings, to supplement quantities. The level of supplementation will not become evident until a contractor commences, non-original linings are removed and the building's true condition known. It is respectfully held that qualification of salvage strategies be submitted to DCC by way of compliance.</p>
<ul style="list-style-type: none"> <li>• The applicant shall confirm the extent of historic boundary wall remaining at this site and shall endeavour to retain and protect as much as possible of it. It is noted from the street that much of the historic wall from Milltown Road and Sandford Road remains fully intact with an unsympathetic cement render applied to the elevations.</li> </ul>	<p>A substantial portion of the existing wall will be retained, increased from that proposed at Stage 2. As shown on the series of drawings Co111 L2000 (prepared by Cameo and Partners), the section along Milltown Road will be opened to form the main entrance.</p> <p>The proposal includes replacing the low wall with railings and removing a small section of the granite wall along Sandford Road only. The design reflects the character of the surrounding area while respecting the historic boundary treatment.</p> <p>It is intended to retain and conserve all sections of historic boundary wall, except for perforation to accommodate vehicular entrance off Milltown Road, as described in Section 7.5 of Chapter 7 of the EIAR.</p>
<ul style="list-style-type: none"> <li>• The detail, material and proposed railing requires further refinement and a revised proposal shall be submitted. The CO notes that the proposed low wall and railing construction is an</li> </ul>	<p>Drawing Co111 L2000a prepared by Cameo and Partners illustrates the design intent for the proposed low wall with railings. The proposal is quiet and benign, and</p>

	<p>urban boundary treatment, rather than a treatment that is appropriate for a historic landscaped setting.</p>	<p>is not intended to distract from the natural parkland amenity. The railings on a low plinth succeeds in revealing the woodland, presently concealed behind a tall wall.</p> <p>As per the response above, a much larger proportion of the existing boundary wall is now being retained and thus the extent of railing has been reduced.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The applicant shall submit a drawing locating the special cedar tree on the landscape drawings.</p>	<p>On drawing Nos. C0111 L100 and CO111 L1000, the cedar tree has been highlighted.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>An updated survey drawing that accompanies the Arborist's report shall be submitted.</p>	<p>An updated tree survey has been completed by CMK Horticulture &amp; Arboriculture Ltd. Please refer to Drawing Nos. TSAN001-DR-00-CMK-ARB-001.1, TSAN001-DR-00-CMK-ARB-001.2, TSAN001-DR-00-CMK-ARB-001.3, TSAN001-DR-00-CMK-ARB-001.4 and TSAN001-DR-00-CMK-ARB-001.5,</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The eaves heights / parapet heights are denoted on the elevation and section drawings as they are more representative of the heights of structures. The parapet heights of new structures should relate to the parapet / eaves heights (i.e top of the vertical elements) heights of the extant structures rather than the ridge height (which is generally hidden in the 3D context).</p>	<p>Please refer to Section 4.2 of the <i>Masterplan + Architectural Design Statement</i> for a comprehensive response to this item.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The Applicant shall consider increasing the buffer zone distances around the historic buildings.</p>	<p>The Applicant has carefully considered the design in respect of their relationship to the adjacent historic structures and consider the buffer provided appropriate having regard to the design measures proposed. In this regard, since the LRD meeting, the balconies on the gable of Block B nearest Tabor House at Level 1 are now entirely contained within the colonnade structure. This ensures the balcony projections remain within the overall frame of the building envelope, thereby eliminating the previous perceived negative impact opposite Tabor House, and ultimately increasing the separation between Block B and Tabor House. To further mitigate any potential for overlooking for proximity issues, the balcony at Level 2 has been relocated to the western edge of the unit. This strategic placement</p>

		<p>ensures that the balcony is not positioned directly opposite the gable end of Tabor House, addressing the sensitive visual and amenity relationship between the two buildings.</p> <p>Further, the lower levels of Block B have been designed with a cut-out to provide a view of Tabor House as it is approached from the green boulevard.</p>  <p>In respect of Block F, this has been located such that it provides a gap to the Chapel, opening up a new landscaped space between the Chapel and Block F.</p> <p>Furthermore, the massing of the and articulation of the blocks adequately defer to the prominence of the retained structures, particularly in light of their existing (original) encroachment and subsumation in respect of the Chapel.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>An alternative arrangement shall be considered to the projecting balconies opposite the gable end of Tabor House. It is noted that it should be possible to provide balconies within the overall frame of the new building instead.</p>	<p>Please refer to Section 4.2 of the <i>Masterplan + Architectural Design Statement</i> for a comprehensive response to this item, which details a revised balcony arrangement.</p>

<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The applicant shall clarify how the history of the site / development of the site will be presented.</p>	<p>Please refer to Section 7.3.10 of Chapter 7 and Appendices 7.1 &amp; 7.3 of the EIAR.</p>
<p><b>2.6 PARKS</b></p>		
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The open space requirements under the development plan zoning and apartment guidelines together with the proposed provision under the submitted scheme shall be presented in a schedule on Drawing CO111L000.</p>	<p>Drawing Co111 L900 has been revised to include a table outlining the requirements in the Apartment Guidelines and the Development Plan zoning.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>In addition, the play space requirements under the apartment guidelines and the provision under the scheme shall be included on a schedule with reference to measured areas on the plan.</p>	<p>The play space provision aligns with the Apartment Guidelines. Play areas have been designed for each age group and meet the required quantities.</p> <p>Refer to the <i>Landscape Design and Access Statement</i> produced by Cameo and Partners for further details.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The public open space is integrated into the development and will not be taken in charge by DCC Park Services.</p>	<p>Note that the Public Open Space will not be taken in charge.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The scheme shall allow 50% of all external seating to have arm &amp; back rests which shall be referenced in the landscape submission.</p>	<p>The scheme now includes benches with arm and backrests. Refer to the <i>Landscape Design and Access Statement</i> produced by Cameo and Partners for further details.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The scheme shall allow 50% of external cycle stands to be covered. Please include details of this within the application landscape submission.</p>	<p>Approximately 50% of the cycle stands are proposed to be covered, either by the building overhang or a dedicated shelter. Refer to the Landscape Design Statement produced by Cameo and Partners for further details.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The arboricultural information shall include a complete updated tree survey and schedule and a tree protection plan. Improvement to tree conservation when compared to the previous application should be noted. Site specific mitigation measures (e.g. no dig solutions in tree RPAs) shall be included and indicated on the tree protection plans.</p>	<p>An updated tree survey has been completed and information regarding the survey and tree protection measures are contained within the <i>Arboricultural Assessment and Impact Report</i>, associated drawings and appendices (Note appendix i for tree survey data/schedule and appendix ii for Tree Protection Method Statement). Mitigation measures have been addressed within Section 6 Arboricultural Impact Assessment of the <i>Arboricultural Assessment and Impact Report</i>. Further details for</p>

		<p>the recommended measures are detailed in the Tree Protection Method Statement.</p> <p>This report notes a greater conservation of trees compared with the previous planning application for the site. A total of 201 No. trees (52% of total) will be removed as a result of the works proposed, as compared to 256 No. (63% of total) from the previous report in 2023. (We note a further 51 No. trees are recommended for removal separately, which are category U trees, already dead and therefore are not impacted by the development so are never included as a figure relating to the development).</p> <p>The proposed design has better enabled the conservation of trees along the western boundary of the site in particular.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>A tree and woodland management plan shall be included with the application to outline future management of this resource into the future, including tree risk assessment requirements, succession tree planting and annual tree maintenance schedule.</p>	<p>Please refer to Appendix iii of the <i>Arboricultural Assessment &amp; Impact Report</i> prepared by CMK Horticulture &amp; Arboriculture Ltd.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>A tree bond will apply to the development (subject to permission) and the value will be determined by CAVAT or Halliwell methods. Arboricultural supervision of the works in proximity to trees will also be required during construction.</p>	<p>Noted.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>A biodiversity enhancement plan shall be provided with the application. This will state measures to be provided within the scheme (landscape, architecture, drainage components) that will support enhancement of urban biodiversity.</p>	<p>Please refer to the Biodiversity Enhancement Plan prepared by DNV.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>A biodiversity management scheme shall be submitted.</p>	<p>Please refer to the Habitat Management Plan prepared by DNV.</p>

<ul style="list-style-type: none"> <li>•</li> </ul>	<p>An ecological impact assessment including Fossitt 2000 habitat mapping shall be provided.</p>	<p>Please refer to the Biodiversity Chapter (Chapter 8) in the EIAR prepared by DNV which comprises the ecological impact assessment, including Fossitt 2000 habitat mapping for the proposed development.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>An updated survey for invasive species shall be provided.</p>	<p>Please refer to the Invasive Species Management Plan prepared by Invasive Plant Solutions.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Appropriate bat friendly lighting is recommended as are pre-construction inspections to ensure biodiversity is appropriately addressed.</p>	<p>Please refer to the Biodiversity Chapter prepared by DNV.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The AA screening shall refer to any available ex-situ bird feeding data for Dublin and any relevance with regards to the site's previous grass pitch areas.</p>	<p>The Applicant has confirmed that there were never any grass pitch areas within the Site of the Proposed Development. As the requirement specifically relates to such areas, this assessment is not applicable, however, the potential for wintering bird species to occur on Site, including any potential for impact has been assessed in full in the Appropriate Assessment Screening Report prepared by DNV, with emphasis placed on Brent Geese in terms of potential ex-situ foraging.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Updated AA screening report required.</p>	<p>Please refer to the Appropriate Assessment Screening Report prepared by DNV.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The proposed development falls within the remit of proposed developments listed under Schedule 5 (Part 2) Planning and Development Regulations, 2001, category 10(b)(i) and therefore an EIAR is required.</p>	<p>Please refer to the Environmental Impact Assessment Report (EIAR), which accompanies this application.</p>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Required Submission Documents:</p> <ul style="list-style-type: none"> <li>- Landscape Masterplan</li> <li>- Hard works/soft works outline plans</li> <li>- Landscape Sections &amp; Elevations</li> <li>- Landscape Design Statement</li> <li>- Arboricultural survey report, tree impact plan, tree protection plan and compensation measures.</li> <li>- Tree &amp; Woodland Management Plan</li> </ul>	<p>These are all submitted with the application.</p>

	<ul style="list-style-type: none"> <li>- Open Space Key Plan with public and communal open spaces and play spaces with area calculations and schedule of requirement and provision.</li> <li>- Boundary Plan with details,</li> <li>- Birds Eye CGIs over public open spaces</li> <li>- Green Roof Plan with biodiverse planting</li> <li>- AA Screening Report</li> <li>- Ecological Impact Assessment (Include Invasive Species assessment)</li> <li>- Biodiversity Enhancement Plan (including details of 'bat friendly' lighting)</li> </ul>	
--	--	--

### 3.0 CONCLUSION

It is our professional planning opinion that the aforementioned responses with the supporting technical reports address the specific items raised in Dublin City Council's Opinion. We trust that this document fully responds to all of the points raised by Dublin City Council in their Opinion and we submit that the proposed development represents the proper planning and sustainable development of this currently underutilised, vacant, brownfield site.

Yours sincerely,

A handwritten signature in black ink that reads "Patricia Thornton".

---

**Patricia Thornton**  
**Director**  
**Thornton O'Connor Town Planning**