

Fingal County Council
Planning Department,
County Hall
Main Street
Swords
K67 X8Y2

29 May 2025

Re: Planning Application for Proposed Large Scale Residential Development of 193 no. Residential Units at part of the Former Teagasc Research Centre, Malahide Road, Kinsealy, Dublin 17

Fingal County Council Reg. Ref. LRD0046/S3

Response to a Request for Further Information.

Dear Sir / Madam,

This submission is made on behalf of the Applicant (The Land Development Agency) in response to the Request for Further Information dated 10 April 2025.

The following drawings and documents are submitted with this response:

- A revised Site Location Map (CCK Drawing No. KI-CCK-S1b-XX-DR-A-1000 Rev A) incorporating minor amendments to the red line application boundary to include minor works to achieve the necessary sightlines from the proposed southern junction with the Malahide Road (Addressing RFI Item No. 1.I)) and to improve the proposed northern entrance to provide for a dedicated signalised pedestrian crossing on the R107/Malahide Road (Addressing RFI Item 1.V).)
 - An updated letter of Consent dated 21 May 2025 from the Department of Education and Skills, consenting to minor works to achieve the necessary sightlines from the proposed southern junction with the Malahide Road.
 - A Letter of Consent dated 29 May from Fingal County Council, consenting to the inclusion of lands on the Malahide Road to accommodate junction improvements to the northern entrance to the Malahide Road

Directors:
Declan Brassil &
Sharon Gorman

Reg No.:
329512

- A revised Site Layout Plan (CCK Drawing No. KI-CCK-S1b-XX-DR-A-1020 Rev A) incorporating amendments to landscaping, boundary treatments, roads and site accesses, in response to the RFI Items.
- Correspondence from Cronin Sutton Consulting Engineers addressing parts of RFI Item Nos. 1, 2 and 4.
- CS Drawing No. C215-CSC-00-XX-DR-C-0038 identifying minor works to achieve the necessary sightlines from the proposed southern junction with the Malahide Road. (Addressing RFI Item No. 1.I))
- CS Consulting Drawing No. C215-CSC-00-XX-DR-C-0004 amending the proposed vehicular access to House No. C1, now accessed from the proposed internal road network. (Addressing RFI Item No. 1.II.)
- CS Consulting Drawings C215-CSC-00-XX-DR-C-0004 and C215-CSC-00-XX-DR-C-0005 amending the proposed greenway route to include a dedicated connection between the sections to the north and south of the site, segregated completely from vehicular traffic. (Addressing RFI Item No. 1.III.)
- CS Consulting Drawings C215-CSC-00-XX-DR-C-0004 and C215-CSC-00-XX-DR-C-0005 amending the proposed layout to provide a continuous footpath connectivity from Road 6, 7 and 1. (Addressing RFI Item No. 1.IV.)
- CS Consulting Drawing C215-CSC-00-XX-DR-C-0037 providing for a dedicated signalised pedestrian crossing on the R107/Malahide Road. (Addressing RFI Item 1.V.)
- CS Drawing No. Drawing No. C215-CSC-00-XX-DR-C-0011 identifying the new location of the SuDS feature located to the west of the playing pitch and Road 1. (Addressing RFI Item No. 2.IV.)
- CS Consulting Drawing Nos. C215-CSC-00-XX-DR-C-0011 and C215-CSC-00-XX-DR-C-0021 indicating the slopes of the basin to be 1:5 as requested. (Addressing RFI Item No. 2.IV.)
- Landscape Planning Additional Information Response prepared by RMDA, Landscape Architects (Addressing Item 2.I to VII)
- Supporting Landscape Drawings prepared by RMDA, Landscape Architects (Addressing Item 2.I to VII)
- A 'Noise Impact Analysis Report Including Dublin Airport Noise Impact' prepared by DKP Environmental (Addressing RFI Item No. 3).

A response to each of the RFI Items, and signposting to submitted drawings and documents where detailed responses are provided, is set out below.

1. Item No. 1

1.1 Item No. 1.I)

*'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Transportation are required to be addressed by the applicant:' (I)
The applicant is requested to give further consideration to the details of the vehicular entrance to the south,*

adjacent to the St Nicholas of Myra NS, and the adjacent boundary treatment; and provide a dedicated sightline drawing demonstrating all works required in order to achieve the sightlines, and if a letter of consent is required from a 3rd party landowner, then this should be provided. If it is not clearly demonstrated that the required sightlines can be achieved, and in the absence of such information the development would be considered a traffic hazard.'

Item No. 1.I) Response

Please refer to the correspondence submitted herewith from Cronin Sutton Consulting Engineers.

CS Drawing No. C215-CSC-00-XX-DR-C-0038 identifies minor works to achieve the necessary sightlines from the proposed southern junction with the Malahide Road.

An updated letter of Consent dated 21 May 2025 from the Department of Education and Skills is also submitted herewith, consenting to minor works to achieve the necessary sightlines from the proposed southern junction with the Malahide Road.

1.2 Item No. 1.II)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Transportation are required to be addressed by the applicant: 'The applicant is requested to further consider the details of the proposed vehicular access to house number C1 directly off the Malahide Road; the Transportation Planning Section considers this vehicular entrance to be not acceptable due to the existing road configuration of the R107, and we would consider this to constitute a traffic hazard. In addition to being cognisant of the requirements of the LAP in relation to entrances onto the Malahide Road.'

Item No. 1.II) Response

Please refer to the correspondence submitted herewith from Cronin Sutton Consulting Engineers.

The submitted CS Consulting Drawing No. C215-CSC-00-XX-DR-C-0004 amends the proposed vehicular access to House No. C1. The proposed vehicular access to the house has been omitted and an alternative parking space has been provided for the house within the development, accessible from the proposed internal road network.

1.3 Item No. 1.III)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Transportation are required to be addressed by the applicant:

The applicant is requested to further consider the layout of the 'shared cycle/pedestrian route/greenway' that runs north-south on the eastern side of the site, so that it provides continuous connectivity in the south-western direction, adjacent to the proposed access road, to connect up to the Malahide Road and the vicinity of the St. Nicholas of Myra National School; and it is recommended that the applicant give further

consideration to providing a continuous greenway to the South of 'road 2' and 'road 3' (as numbered in the engineering/roads drawings), so that the greenway is uninterrupted and does not share any section with vehicular traffic.'

Item No. 1.III) Response

Please refer to the correspondence submitted herewith from Cronin Sutton Consulting Engineers.

CS Consulting Drawings C215-CSC-00-XX-DR-C-0004 and C215-CSC-00-XX-DR-C-0005 amend the proposed greenway route to include a dedicated connection between the sections to the north and south of the site, segregated completely from vehicular traffic.

1.4 Item No. 1.IV)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Transportation are required to be addressed by the applicant:

The applicant is requested give further consideration to providing a continuous footpath along the western side of 'road 7' (as numbered in the roads/engineering drawings), in order to provide a dedicated continuous footpath connectivity through the centre of the development in the north-south direction (i.e. continuous footpath connectivity along roads 6, 7 and 1). The Transportation Planning Section considers that there would be a strong pedestrian desire line in this direction through the development and would have a strong preference that a dedicated footpath is provided, with associated tactile paving etc.'

Item No. 1.V) Response

Please refer to the correspondence submitted herewith from Cronin Sutton Consulting Engineers.

Submitted CS Consulting Drawing Nos. C215-CSC-00-XX-DR-C-0004 and C215-CSC-00-XX-DR-C-0005 amend the proposed layout to provide a continuous footpath connectivity from Road 6, 7 and 1.

1.5 Item No. 1.V)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Transportation are required to be addressed by the applicant:

The applicant is requested to further address the Issue 6.8 contained in the submitted 'Road Safety Audit Stage 1' and provide further developed details of a dedicated pedestrian crossing of the 'R107 Road'/'Malahide Road' adjacent to the proposed pedestrian access/bus stop. The Transportation Planning Section has a strong preference that this infrastructure would be a signal-controlled pedestrian crossing.'

Item No. 1.V) Response

Please refer to the correspondence submitted herewith from Cronin Sutton Consulting Engineers.

Submitted CS Consulting Drawing No. C215-CSC-00-XX-DR-C-0037 provide for a dedicated signalised pedestrian crossing on the R107/Malahide Road.

2 Item No. 2

2.1 Item No. 2 (I)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

- As previously stated in the Stage 2 Opinion, the applicant is requested to produce a drawing clearly identifying the area in square metres of each unit of Public Open Space. These areas should be outlined using a thin line on a detailed landscape plan. The applicant is requested to demonstrate compliance with Table 14.11: Public Open Space and Play Space Hierarchy and Accessibility Standards of Fingal's Development Plan.*
- Applicant is requested to provide further details regarding the contribution of the proposed Green Way to the open space provision. If the Greenway is to be included as open space, it requires improvement in relation to functionality & width, or else it should be discounted from the calculation.'*

Item No. 2.I) Response

Please refer to the Landscape Planning Additional Information Response and supporting drawings prepared by RMDA Landscape Architects and submitted herewith.

The RMDA Response Document and supporting drawings (1713 - Rev J – Kinsealy Teagasc-Landscape-RMDA-DWG. 0 O.S.; DWG 1. M.P., DWG 4.1 P.P.1 & DWG 4.2 P.P.2) clearly define the areas of Public Open Space as required under Item 2.I and demonstrates compliance with Table 14.11 of the Development Plan.

The RMDA Response Document provides a detailed response in respect of the contribution the proposed Green Way will contribute to open space provision consistent with the requirements of the Sustainable and Compact Settlement Guidelines for Planning Authorities 2024, the County Development Plan and the Kinsealy Local Area Plan.

2.2 Item No. 2.II)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

The applicant is requested to fully address the comments raised by the Conservation Officer in relation to boundary treatment in the Stage 2 Opinion which were as follows:

Boundary Treatment - to the north boundary asked for additional mature planting including trees on the development side of the boundary to ensure sufficient planted buffer between both sites. The eastern boundary treatment of a timber fence to the rear with the proposed terrace of housing is not a satisfactory treatment. Need to provide durable boundary. The side facing the protected structure needs to be quality finish. In this regard, the proposed paladin fence along the northern boundary to the Teagasc building should be replaced with a solid bar (20mm) diameter fence, painted black. The trees and vegetation located on the northern boundary should be retained and protected in accordance with BS5837:2012 Trees in relation to Design, Demolition and Constructions Recommendations. Additional space (by increasing the green space along the East-West Green link) should be provided to allow for new tree planting along this boundary.'

Item No. 2.II) Response

Please refer to the Landscape Planning Additional Information Response and supporting drawings prepared by RMDA Landscape Architects and submitted herewith.

The landscape scheme has been revised to include additional planting along the northern boundary of the Teagasc building and its curtilage. Please refer to RMDA Response Document and supporting drawings 1713 - Rev J – Kinsealy Teagasc-Landscape-RMDA- DWG 1. M.P & DWG 2 Boundary for further details.

2.3 Item No. 2.III)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

The applicant is requested to cross reference their drawings to ensure that trees which have been previously shown for retention are still being retained. In addition, the applicant shall clearly demonstrate that adequate room is being provided for future growth and successful retention of these trees shown for retention in light of their new urban environment.'

Item No. 2.III) Response

Please refer to the Landscape Planning Additional Information Response and supporting drawings prepared by RMDA Landscape Architects and submitted herewith.

Please refer to RMDA Response Document and supporting drawings 1713 - Rev J – Kinsealy Teagasc Landscape-RMDA-DWG.1 M.P. & DWG.1.1 T.S. for details of existing trees proposed for retention.

2.4 Item No. 2.IV)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

The applicant is requested to provide adequate space for the proposed SuDS feature located to the east of house 90 and north of the playground in order that it does not require to be fenced off from the public and can be safely maintained. The applicant shall also demonstrate that the slopes to the proposed SuDS feature located in the north-eastern corner of the site has 1:5 slopes.'

Item No. 2.IV) Response

Please refer to the correspondence submitted herewith from Cronin Sutton Consulting Engineers.

Submitted CS Drawing No. Drawing No. C215-CSC-00-XX-DR-C-0011 identifies the new location of the SuDS feature located to the west of the playing pitch and Road 1, relocated away from House No. 90, as requested.

Submitted CS Consulting Drawing Nos. C215-CSC-00-XX-DR-C-0011 and C215-CSC-00-XX-DR-C-0021 indicate the slopes of the basin to be 1:5 as requested.

An updated Landscape Masterplan has also been prepared by RMDA Landscape Architects, please refer to RMDA Response Document and supporting drawing 1713 - Rev J – Kinsealy Teagasc Landscape-RMDA-DWG.1 M.P.

2.5 Item No. 2.V)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

A landscape plan for the Greenbelt lands shall be provided to clearly indicate that

- a full-sized all-weather pitch including boundary treatment and drainage shall be accommodated within the Greenbelt lands to the south.*
- boundary treatment and entrances from the residential lands into the public park in the Greenbelt lands.*

Further details and explanation in relation to the treatment of the existing reservoir in terms of landscape treatment and ecology.

It should be noted that the proposed earth mounding shall be omitted from the Greenbelt lands. This will allow for the increase in retention of existing trees and vegetation on this site.

Item No. 2.V) Response

Please refer to the Landscape Planning Additional Information Response and supporting drawings prepared by RMDA Landscape Architects and submitted herewith.

With regard to the provision of a full-sized all-weather pitch, the updated Masterplan demonstrates that a full-sized pitch can be accommodated on the greenbelt lands. As stated in the application documents, these lands are currently the subject of an application to An Bord Pleanála for water services infrastructure

associated with the GDDS project. Uisce Éireann has applied for temporary and permanent wayleaves across the area on which the proposed playing pitch is to be provided to facilitate the construction and operation of the GDDS water services infrastructure. Pending the determination of that application, and the completion of the proposed works, if permitted, it is premature to provide the proposed all-weather soccer pitch at this location. Accordingly, a full-sized grassed playing pitch will be provided in the interim, pending the outcome of the GDDS application. Full details of proposed grassed pitch, including specification have, been provided in the RMDA Response Document and supporting drawing 1713 - Rev J – Kinsealy Teagasc Landscape-RMDA-DWG.3.3 P.D. Further details in respect of the future all-weather soccer pitch have also been included for completeness.

Please refer to RMDA Response Document and supporting drawings for details of revised boundary treatments between the proposed residential development and the Greenbelt lands. The RMDA Response Document provide details of the replacement of the existing unsafe reservoir with a new landscape SuDS feature which will maintain the overall biodiversity value of the feature. A rationale for the retention of the earth mounding feature within the Greenbelt lands.

2.6 Item No. 2.VI)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

A revised drawing indicating a 25-metre separation distance from proposed play provision and existing and proposed residential units is required.'

Item No. 2.VI) Response

Please refer to the Landscape Planning Additional Information Response and supporting drawings prepared by RMDA Landscape Architects and submitted herewith.

As detailed in the RMDA Response, the landscape architect's drawings have been annotated with dimensions confirming a 25m separation distance from the proposed play provision to both proposed and existing residential dwellings. Please refer to RMDA Drawing No. 1713 - Rev J -KinsealyTeagasc-Landscape-RMDA-DWG.1.4 Dims.

2.7 Item No. 2.VII)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Parks and Green Infrastructure are required to be addressed by the applicant:

A revised boundary treatment plan is required. Further details are require in relation to the proposed boundary along the northern boundary.'

Item No. 2.VI) Response

Please refer to the Landscape Planning Additional Information Response and supporting drawings prepared by RMDA Landscape Architects and submitted herewith.

A revised boundary plan has been prepared and submitted herewith, please refer to to RMDA Drawing No. 1713 - Rev J -Kinsealy Teagasc-Landscape-RMDA-DWG. 2 Boundary. The RMDA Response provides clarification on the boundary treatment and planting along of the northern boundary of the site (see also RMDA Drawing Nos. 1713 - Rev J -Kinsealy Teagasc-Landscape-RMDA-DWG. 3.1 B.D. and DWG 3.2 S.D.).

3 Item No. 3

3.1 Item No. 3.I)

'Following an assessment of the submitted plans and details by the Local Planning Authority, it is considered the following technical issues relating to Air & Noise are required to be addressed by the applicant: The applicant is required to carry out a revised noise impact assessment in accordance with the provisions of ProPG: Planning & Noise - Professional Practice Guidance on Planning & Noise - New Residential Development May 2017. Where there is a likelihood of an adverse noise impact, the application shall be supplemented by an Acoustic Design Statement (ADS) demonstrating how the general principles of good acoustic design will be followed in the development, having regard to internal and external noise level guidelines. This is required to be completed by an appropriately qualified acoustician and competent person, and the applicant is strongly advised to seek expert advice.'

Item No. 3.I) Response

DKP Environmental was commissioned to undertake a revised noise impact assessment in accordance with the provisions of the Planning & Noise - Professional Practice Guidance on Planning & Noise - New Residential Development May 2017.

The noise impact assessment report is submitted herewith, titled 'Noise Impact Analysis Report Including Dublin Airport Noise Impact'. An Acoustic Design Statement is attached to the Report as Appendix A.

The Report assesses the site's calculated combined noise exposure from the aircraft noise and traffic noise. Two limited areas at the site entrance and the most southern part of the site exceed the guidelines for daytime noise and come within the scope of Category "B" where noise impact may have to be considered. The average night time noise exposure of all proposed dwellings exceeds the EPA maximum recommended night time façade expose guidelines and also come within the noise assessment criterion Category "B" where noise impact may have to be considered.

The noise impact on the internal habitable rooms was also calculated and established that the ambient internal room noise levels will be between 20dB and 30dB during the day time and between 10dB and 24dB during the night time period using a façade (and roof) noise reduction capability of 35dB representing an achievable reduction with current construction methods and materials. The resultant noise levels are categorised as "Very good / Country" under the WHO/BS8233 recommended maximum habitable room noise level guidelines.

The Report concludes that: *'Based on the above, DKP, deem this to be satisfactory and within the recommendations of the relevant standards and guides'.*

3.2 Item No. 3.II)

'Any revised noise impact assessment report and/or acoustic design statement submitted by the applicant shall clearly state at the outset the acoustic qualifications and acoustics experience of those involved, in order to demonstrate to the Local Authority that they have the requisite qualifications and skills to undertake this work and are competent.'

Item No. 3.II) Response

The submitted 'Noise Impact Analysis Report Including Dublin Airport Noise Impact' prepared by DKP Environmental includes the following detail at section 1.4:

This report was prepared by Gerrard van Deventer, director at DK Partnership. Gerard has over 35 years' experience in consulting engineering and the measurement and assessment of environmental noise including the preparation of noise and vibration impact assessments and EIARs (Noise and Vibration chapter). Furthermore, he has experience in acoustic measurement relating to environmental projects, infrastructure projects and building acoustics.

4. Conclusion

I trust that this response has comprehensively addressed the matters raised and I look forward to an early and favourable decision.

Yours faithfully,



Declan Brassil
Declan Brassil & Co.