



THORNTON O'CONNOR
TOWN PLANNING

Statement of Response to LRD Opinion

**Prepared in Respect of a Planning
Application for a Large-Scale Residential
Development (LRD) at a Site of 1.32 Ha at
Whitestown Way, Tallaght, Dublin 24**

**On Behalf of ARP 4.2 Sustainable
Communities (Ireland) Fund**

May 2026

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INTRODUCTION

This *Statement of Response to LRD Opinion* (Statement of Response) has been prepared by Thornton O'Connor Town Planning¹ (TOC) on behalf of ARP 4.2 Sustainable Communities (Ireland) Fund² (the Applicant) in respect of a Planning Application for a Large-Scale Residential Development (LRD) submitted to South Dublin County Council (SDCC). In summary, the LRD comprises 169 No. residential units, 2 No. class 1 / class 2 commercial units and a crèche at a site of approximately 1.32 Ha at Whitestown Way, Tallaght, Dublin 24.

Full details of the site location and a description of the development are included in TOC's submitted *Planning Report and Statement of Consistency*.

This Statement of Response has been drafted based on insights provided by the plans and particulars prepared by the wider Design Team: Reddy Architecture & Urbanism³, DBFL Consulting Engineers⁴, Fallon Design⁵, Mitchell + Associates⁶, CMK Urban Forestry Consultants⁷, O'Connor Sutton Cronin⁸, 3D Design Bureau⁹, Wave Dynamics¹⁰, Awn Consulting¹¹, ISM¹², Lawler Sustainability¹³, Straten CSL¹⁴ and IAC¹⁵. Therefore, this report **must** be read in tandem with these materials.

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1. PROCEDURAL

LRD Opinion Request	Response
A statement of consistency with the South Dublin County Development Plan 2022-2028 policies and any relevant national policy shall be provided.	Please refer to the enclosed <i>Planning Report and Statement of Consistency</i> prepared by Thornton O'Connor Town Planning.

2. BUILT FORM AND LAYOUT

LRD Opinion Request	Response
The applicant is requested to submit contextual elevations clearly illustrating the relationship between the podium level and the ground-floor communal areas, with particular emphasis on how these spaces interface with both the proposed blocks and the surrounding public realm. Furthermore, a comprehensive assessment of the design and positioning of upper-floor balconies should be submitted, addressing any potential impacts on residential amenity, including overlooking of private amenity spaces. Where necessary, appropriate mitigation measures should be identified to safeguard privacy and ensure a high standard of residential amenity.	Please refer to Section 7.1 of RAU's enclosed <i>Design Statement</i> , as well as to the supplementary text provided in the <i>Planning Report and Statement of Consistency</i> prepared by Thornton O'Connor Town Planning.
The submission of high-quality CGI visuals is recommended to illustrate how the proposed development would integrate within the existing urban context, particularly at street level. The applicant is encouraged to incorporate strong architectural treatment and visual interest in the design of the undercroft/podium façade between Blocks A and B, ensuring that blank or inactive elevations are avoided. Thoughtful design interventions in this regard would enhance the streetscape, improve the pedestrian experience, and contribute positively to the character of the northern and southern access routes.	Please refer to Section 7.1 of RAU's enclosed <i>Design Statement</i> .
The development should demonstrate robust passive surveillance of all public and communal areas, supported by appropriate design and mitigation measures.	Please refer to Section 7.1 of RAU's enclosed <i>Design Statement</i> .

3. PLOT RATIO

LRD Opinion Request	Response
Provide a robust justification for any deviation of the plot ratio parameters set within the Local Area Plan.	Please refer to Section 6.2.3 of the <i>Planning Report and Statement of Consistency</i> prepared by Thornton O'Connor Town Planning.

LRD Opinion Request	Response
<ul style="list-style-type: none"> For any existing or proposed constraints on development which serve to diminish the plot ratio (calculated by gross site area), the applicant should demonstrate the necessity of these constraints and therefore why plot ratio should be assessed with respect to the net site area. Finally, the applicant should, if calculating net site area, calculate it on the basis of the criteria provided for in the 2024 Guidelines. Alternatively, the applicant should provide further rationale for the proposed plot ratio, having specific regard to the criteria set out in Section 2.6.1 of the Local Area Plan. 	

4. DAYLIGHT AND SUNLIGHT

LRD Opinion Request	Response
<p>The final design proposed should aim to achieve 100% compliance to ensure all future residents benefit from accommodation that meets minimum target levels. A comprehensive Sunlight and Daylight and Assessment submitted as part of same. In addition, shadow analysis of the existing environment and proposed development should also be submitted.</p>	<p>Please refer to the enclosed <i>Daylight and Sunlight Assessment Report</i> prepared by 3D Design Bureau. This covers all relevant aspects of daylight and sunlight as they pertain to the development’s (1) potential impacts on adjacent properties and (2) own performance. The report also includes the requested shadow analysis.</p> <p>It should be noted that the aim has always been to try to achieve 100% compliance. Yet, this is an exceptionally high bar to reach, especially within existing built-up areas and where higher development densities and intensities are required.</p> <p>The proposed development does not attain 100% compliance. However, for the reasons above (amongst others) this is acceptable. In fact, the BRE209 Guide itself, states:</p> <p><i>“The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is</i></p>

LRD Opinion Request	Response
	<p><i>to help rather than constrain the designer. <u>Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...</u>" [emphasis added]</i></p> <p>Therefore, the Guide is just that – a guide – and not a standard against which a development must slavishly and absolutely comply. As will become evident upon review of 3D Design Bureau’s report, the proposed development will result in a series of high-quality and attractive living and amenity spaces for future residents.</p>

5. NOISE

LRD Opinion Request	Response
<p>A comprehensive Acoustic Design Statement, as per current relevant guidance, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out within. The applicant should give due regard to any existing commercial/industrial/mixed-uses and their associated operational parameters within the final analysis submitted.</p>	<p>Please refer to the enclosed <i>Acoustic Design Statement</i> prepared by Wave Dynamics Acoustic Consultants.</p>

6. RESIDENTIAL ACCOMMODATION

LRD Opinion Request	Response
<p>Demonstrate full compliance with the County Development Plan and any relevant national guidelines, on foot of any alterations to the scheme implemented as a result of this opinion report.</p>	<p>Please refer to the <i>Accommodation Schedule, Housing Quality Assessments</i> and <i>Design Statement</i> prepared by RAU, as well as the <i>Planning Report and Statement of Consistency</i> prepared by Thornton O’Connor Town Planning.</p>

7. CHILDCARE PROVISION

LRD Opinion Request	Response
Demonstrate that the proposed facility is capable of accommodating the childcare spaces required. The onus to ascertain the requirements of Tusla in this regard is on the applicant. The applicant should engage with the South Dublin Childcare Committee with regard to same.	This is noted. Details are provided in Section 7.4 of RAU's <i>Design Statement</i> , and in Section 4.2 of the <i>Social Infrastructure</i> and Section 5.7 of the <i>Planning Report and Statement of Consistency</i> prepared by Thornton O'Connor Town Planning.

8. SUSTAINABLE MOVEMENT

LRD Opinion Request	Response
The applicant should adequately review and address all concerns and items contained within the SDCC Roads department report attached within Appendix 5 of this report.	Please refer to DBFL's enclosed <i>Infrastructure Design Report</i> , and specifically its Section 6.1.

9. GREEN INFRASTRUCTURE

LRD Opinion Request	Response
The applicant should adequately review and address all concerns and items contained within the SDCC Public Realm and Parks report attached within Appendix 6 of this report. Additionally, details of how the communal space will be managed shall be provided. In addition, the size of each of the balconies should align with those set out in the relevant apartment guidelines and should be designed in such a way as to provide appropriate levels of amenity for its users.	<p>In relation to the various items raised by the Public Realm and Parks Department, we direct the reader to the complete pack prepared by Mitchell + Associates and in particular, their <i>Landscape Report</i>.</p> <p>Management of the communal space is detailed in the enclosed <i>Landscape Report</i> and <i>Softworks Specification</i> prepared by Mitchell + Associates, as well as in the <i>Building Lifecycle Report</i> prepared by RAU.</p> <p>All terraces and balconies meet or exceed the minimum area standards based on the size of the corresponding units, and are at least 1.5 m deep. Compliance with the relevant standards is confirmed in the individual unit type drawing and the <i>Housing Quality Assessments</i>. Amenity of the private amenity spaces is discussed in various locations in the</p>

LRD Opinion Request	Response
	submitted materials, including in the Design Statement prepared by RAU and Section 6.3 of the <i>Planning Report and Statement of Consistency</i> prepared by Thornton O'Connor Town Planning.

10. WATER SERVICES

LRD Opinion Request	Response
The applicant should adequately review all concerns and items contained within the SDCC Water Services report attached within Appendix 7 of this report.	Please refer to DBFL's enclosed <i>Infrastructure Design Report</i> , and specifically its Section 6.2.
The Planning Authority recommends that, in relation to setbacks from existing pipes, the final application should demonstrate compliance with the setback requirements contained in the Greater Dublin Regional Code of Practice for Drainage Works and the GSDSDS Technical Documents on New Developments, and the requirements of Uisce Éireann, as appropriate.	Cognisance has been taken for the various requirements involved. Please refer to DBFL's enclosed <i>Infrastructure Design Report</i> , as well as their suite of technical drawings.

11. TALLAGHT DISTRICT HEATING NETWORK

LRD Opinion Request	Response
Details of how the proposal satisfies each of the criteria set out in Section 12.10.2 of the County Development Plan & 7.4.5 of the LAP, shall be provided.	Please refer to the enclosed <i>LRD Opinion Response</i> prepared by Fallon Design.