



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 6.05 Ha in
Blessington, Co. Wicklow**

**On Behalf of Marshall Yards Development
Company Limited**

October 2024

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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 Marshall Yards Development Company Limited² (the Applicant) in respect of a Planning Application for a Large-scale Residential Development (LRD) to Wicklow County Council (WCC). In summary, and principally, the LRD comprises of 269 No. residential units, a medical centre, a café and a pharmacy at a site of 6.05 Ha in Blessington, Co. Wicklow.

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 Applicant and the wider Design Team: TOC, Dedy Gahan Architects³, DBFL Consulting Engineers⁴, Ilsa Rutgers Landscape Architecture⁵, Waterman Moylan⁶, CMK Horticulture and Arboriculture Limited⁷, IAC⁸, Openfield⁹, JBA Consulting¹⁰ (JBA), 3D Design Bureau¹¹ (3DDB), Byrne Environmental¹² and Sabre Electrical Services Limited¹³. Therefore, this report must be read in tandem with these materials.

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<p>Reason for not constituting a reasonable basis on which to make an application – (i)</p> <p>AND</p> <p>Issues to be addressed – (i)</p>	<p>Issue raised: It has not been demonstrated that the proposed development would be in accordance with the zoning objective for the Town Centre zoned lands within the site, derived from the Blessington LAP 2013, having regard to the limited proportion of town centre uses proposed;</p> <p>To be addressed: Having regard to the zoning objective for the Town Centre zoned lands, justification for the quantum and mix of land uses proposed should be provided. Alternatively, revised proposals may be submitted in this regard. The response should include a map showing the proposed development in relation to the Town Centre zoned lands, together with a schedule of accommodation for this area.</p>	<p>Further to the Section 247 and Section 32C consultations, revisions have been made to the development. The scheme that is now presented in this Planning Application includes 3 No. non-residential units comprising 399 sq m of floor space. These medical centre, café and pharmacy uses are proposed at ground floor level of the mixed-use block, and provide an important activation of the streetscapes at the southern corner of the site.</p> <p>These uses are in addition to the proposed later living units, which we contend are a wholly unique residential use, but a distinct typology to 'standard' housing.</p> <p>Details of the quantum of the uses proposed on the town centre zoned lands are demonstrated on DGA's <i>Proposed Site Plan (Zoning Overlay)</i> drawing, with the justification for the mix of uses presented in Section 7.1 of TOC's <i>Planning Report and Statement of Consistency</i>.</p>
<p>Reason for not constituting a reasonable basis on which to make an application – (ii)</p> <p>AND</p> <p>Issues to be addressed – (ii)</p>	<p>Issue raised: It has not been demonstrated that the proposed development would be in accordance with the density standards of the CDP 2022-2028, having regard to the location of the site in a Large Town and within 500m walking distance of a bus stop; and</p> <p>To be addressed: A Statement of Consistency should be submitted, setting out how the proposed</p>	<p>With respect to density, the Planning Authority is directed to the detailed justification in Section 7.4 of the enclosed <i>Planning Report and Statement of Consistency</i>.</p> <p>As required by this LRD item and the content of the <i>LRD Opinion Planner's Report</i>, the development has been revised to include additional dwellings in order to comply with both the <i>Wicklow County Development Plan 2022–2028</i> and the <i>Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities</i>. This has resulted in an uplift in the net density to 51.2 dph.</p>

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	development is consistent with the density standards of the CDP 2022-2028. Alternatively, revised proposals may be submitted in this regard. The Statement should include a plan showing the areas of the site located within 500m walking distance of a bus stop.	
<p>Reason for not constituting a reasonable basis on which to make an application – (iii)</p> <p>AND</p> <p>Issues to be addressed – (iii)</p>	<p>Issue raised: It has not been demonstrated that adequate childcare facilities to serve the demand generated by the proposed development are available or would be provided in tandem with the delivery of housing;</p> <p>To be addressed: A robust Social Infrastructure Assessment is required to be submitted to show that sufficient childcare spaces would be available to cater for the overall development, in tandem with the phased delivery of housing.</p>	<p>As part of the Planning Application, a childcare audit was carried out within the broader <i>Social Infrastructure Audit</i> (SIA) to understand the need for new facilities to be included in the development to serve the proposed residential dwellings (269 No. units). There are a number of new residential developments awaiting a decision, granted or being completed in and around the town, and the study aimed to derive the net demand associated with these developments alongside the planned capacity for childcare provision within existing operators and planned childcare facilities.</p> <p>The Wicklow County Childcare Committee was consulted as part of this local assessment but were unable to provide any recent insights or data associated with supply or demand around the town.</p> <p>Our analysis drew the following key conclusions:</p> <ul style="list-style-type: none"> • There are a number of existing childcare facilities in the town (with some identified vacancy). There were 4 No. facilities identified in the catchment with a current enrolment of 226 No. children. The study identified a physical capacity to support 258 No. children, however, only a smaller portion of those (12 No. places) were available spaces (owing to staffing shortages, etc). • From a demographic perspective, while the population of the catchment area increased by 91 No. persons between 2016 and 2022, the number of children aged between 0- and 6-years has dropped significantly by 39.8%

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		<p>(i.e. there are 318 No. less children aged 0-6 than in 2016). There are now just 480 No. children aged between 0- and 6-years in Blessington according to census data. Based on average take-up rates, Blessington has a high proportion of childcare places per capita.</p> <ul style="list-style-type: none"> • The SIA demonstrated that the proposed scheme would generate a possible demand for 11 No. childcare places, based on the established take-up rate for childcare facilities in Wicklow of 20% (census finding). Note that it is vitally important to differentiate between child population and take-up rate, which is effectively a reflection of demand. • The cumulative demand associated with all granted residential schemes in Blessington (in addition to the proposed scheme) has been calculated in the SIA and indicates a possible demand for 40 No. childcare places, based on the established take-up rate for childcare facilities in Wicklow of 20%. • There are planning consents permitted or proposed to expand childcare capacity by 130 No. places in the town in the near future. • Notably, for the last number of years, the town of Blessington has had a large oversupply of available unmet childcare spaces (specifically within Cocoon Childcare-Blessington). However, in the past year this oversupply has diminished due to the recent influx of children associated with the ongoing completion of the Sorrell Wood housing estate. • Importantly, whilst the demand associated with the Sorrell Wood housing scheme should have been absorbed by the large childcare facility to be built as part of that development, the childcare facility in that scheme is still under construction and its approximately 100 No. childcare spaces (<u>in excess of what we calculate it requires</u>) have not become active yet. • Therefore, it is likely that once the Sorrell Wood childcare facility is operational in the near-term, spaces will become available within existing facilities as children are enrolled in the former. • It is judged that the planned capacity of 130 No. additional childcare places for the town, alongside the shifting demographic structure of the town, will ensure a sufficient phasing of childcare places to meet

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		the demands of the town (and associated new residential housing estates) into the future.
A – Density	The proposed development should demonstrate how it is in accordance with the policy and guidance relating to density as set out in the Sustainable and Compact Settlements Guidelines 2024. Density calculations should be clearly set out in the planning application. The site area used for the purposes of calculating the residential density of the development should be clearly indicated.	Please refer to the response to item (ii) above and Section 7.4 of the enclosed <i>Planning Report and Statement of Consistency</i> .
B – Housing Mix	Any forthcoming application should demonstrate that it would provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to provide choice and meet local housing need, in accordance with CPO 6.27 of the CDP 2022-2028.	A robust justification in respect of housing mix is included in Section 7.6 of the enclosed <i>Planning Report and Statement of Consistency</i> .
C – Phasing	A detailed phasing proposal, accompanied by a robust planning report, should be submitted with any application, which details how all necessary infrastructure, in particular, the Blessington Inner Relief Road, estate roads, open space, services, Part V proposals, access, childcare provision, etc, would be provided in tandem with the occupation of dwellings. Any phasing plan should ensure that the proposed development is sustainable and would generally accord with the phasing requirements of the Development Plan.	<p>The development is proposed to be delivered in 2 No. phases, with Phase 1 sub-divided into Phase 1A and 1B. The extent of these phases is shown on DGA's drawing titled <i>Phasing Strategy</i>.</p> <p>As is evident, the principal or core road network as well as all public open and communal amenity spaces will be delivered in Phase 1. This is to ensure the timely manner of key infrastructure and amenities and to facilitate the subsequent delivery of Phase 2.</p> <p>Phase 1A includes the external road and traffic works, including the roundabout upgrades and various pedestrian/cyclist crossings.</p>

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		<p>Noting the importance of delivering the mix of uses on-site, and on the town centre zoned portion of the site specifically, it is intended that the mixed-use block and later living units will come forward early-on in Phase 1B.</p> <p>The proposed Part V units have been split across the 2 No. phases, with 19 No. in Phase 1A and 8 No. in Phase 2, guaranteeing early delivering of dwellings for the Council.</p>
D – Open Space & Landscaping	<ul style="list-style-type: none"> A landscaping plan of the entire site showing the measured areas of open space to serve the development showing the locations and details of different play spaces, seating areas etc, including those indicated as previously permitted should be submitted. Age friendly seating should be included. All boundary treatments on the landscaping plan should be colour coded and details of their appearance (elevations, facing materials) provided. Any application should indicate where routes are not universally accessible and indicate where alternative convenient routes are provided. A landscaping report which demonstrates how all areas of open space within the proposed development are sufficiently overlooked, secure and usable and clearly show that there are no 'left over' spaces which could become areas for anti-social behaviour, 	<p>Please refer to the suite of materials prepared by Ilsa Rutgers Landscape Architecture and enclosed as part of this Planning Application.</p> <p>These drawings and <i>Landscape Design Statement</i> address each of the sub-items referenced, illustrating the quality of the development's landscape proposition.</p>

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	dumping etc should be submitted. The report should rationalise the design of the open spaces, pedestrian routes and finishes. Cross-sections and levels details for the open spaces should be provided.	
E – Housing Standards & Apartment Guidelines	<ul style="list-style-type: none"> • A Housing Quality Assessment should be submitted, which should address all relevant Specific Planning Policy Requirements. • The areas of communal open space dedicated to the duplex/apartments should be clearly delineated and the measured area stated on the drawings. Full details of landscaping proposals for these areas should be submitted. • Sufficient details (including areas, levels and boundary treatments) should be submitted to show that private amenity spaces associated with the apartment/duplex units will provide good quality amenity. 	<p>In relation to the <u>Housing Quality Assessment</u> please refer to same prepared by DGA and included as part of this Planning Application. Specific Planning Policy Requirements of relevant Section 28 Guidelines are also addressed in TOC's <i>Planning Report and Statement of Consistency</i>.</p> <p>With respect to the <u>delineation of open space areas</u>, please refer to DGA's drawing titled <i>Open Space Allocation</i>. This drawing clearly differentiates between the proposed areas. We recommend that this be read in conjunction with the open space section (7.9) of TOC's enclosed <i>Planning Report and Statement of Consistency</i>. Full <u>landscaping proposals</u> have been prepared by Ilsa Rutgers Landscape Architecture and are included in the Planning Application pack.</p> <p><u>Open space details</u> are included in the materials prepared by several disciplines, depending on their specialism. We direct the Planning Authority to the above-mentioned landscape documents, as well as to DGA's <i>Open Space Allocation</i> and <i>Proposed Site Plan</i> drawings and TOC's <i>Planning Report and Statement of Consistency</i>. We also suggest reviewing the various verified view photomontages, presentation montages and computer generated images prepared by 3D Design Bureau and featuring in their booklet titled <i>Verified Views, Presentation and CGI</i>.</p>
F – Archaeology	An Archaeological Impact Assessment should be undertaken and inform the design of the proposed development so as to minimise any potential impacts on archaeological features. The AIA should be submitted with any forthcoming application.	Please refer to the enclosed <i>Archaeological Assessment</i> prepared IAC Archaeology, as well as to Section 7.11 of TOC's <i>Planning Report and Statement of Consistency</i> .

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G – Design & Visual Amenity	<p>a) A Design Statement should be submitted, having regard to the relevant policy, objectives and standards of the CDP 2022-2028, Sustainable Residential Development and Compact Settlements Guidelines 2024 and the Apartment Guidelines 2022. The statement should provide a rationale and justification for a development proposal and the design approach taken, including with regard to layout, scale and appearance, in order to create an interesting and attractive form of development.</p> <p>b) Details of the finishes proposed throughout the scheme should be submitted in the form of photographic samples, particularly render colour, brick colour and roof slate/tile colour.</p>	<p>In respect of both 6(a) and 6(b), we refer the Planning Authority to DGA's <i>Architectural Design Statement</i>, which provided a detailed overview of the development and the rationale underpinning its design.</p> <p>Please also refer to TOC's <i>Planning Report and Statement of Consistency</i> for details of compliance with relevant planning and development policy.</p>
H – Car Parking	<p>a) The location of accessible car parking spaces should be clearly indicated.</p> <p>b) Details of EV Charging points for the proposed duplex units should be submitted, including ducting and wiring under the footpath to such spaces. 1 recharging point should be installed for every 10 car parking spaces serving the duplex units. Installation of ducting infrastructure for every parking space serving the duplexes should be shown in accordance with CPO12.8 of the 2022-2028 County Development Plan.</p>	<p>With regard to car parking provision, allocation and distribution we direct the Planning Authority to DGA's <i>Parking, Bins and Bikes Scheme</i> drawing and to TOC's <i>Planning Report and Statement of Consistency</i>. This drawing and report set out compliance with policy in terms of overall quantitative provision and accessible parking spaces.</p> <p>With regard to Electric Vehicle Charging, we refer the Planning Authority to the <i>Electric Vehicle Charging Strategy</i> prepared by Kerrigan Consulting submitted herewith which sets out the strategy for same.</p>

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I – Transport	Any future application should address the comments of the Roads Department (outlined in the attached Opinion Report). In particular, any forthcoming application should address concerns raised that the capacity of the local road network would not be able to cater for this development, without delivery of the northern section of the BIRR	<p>This report was subsequently secured from the Council and relates to various transport items, drainage/water infrastructure, public lighting, etc.</p> <p>The items raised have been taken into consideration and have been incorporated into the design of the proposed development. Principally, please refer to materials prepared by DBFL, Waterman Moylan and Sabre.</p>
J – Flooding/Rivers/Surface Water Drainage	<ul style="list-style-type: none"> • Petrol Interceptors and/or Bioretention areas should be provided to account for road runoff prior to any receiving waters • The Fisheries watercourse guidance (Streamside zone 10m, Middle Zone 15-30m and Outer Zone SuDS) and development plan 25m requirement in relation to the channel in the northwest of the site should be addressed. • The drainage design should incorporate nature-based SUDs, where possible. • Flow control devices / hydrobrake manholes should be shown on submitted drawings. The flow control device would not be permitted to have a bypass door and a penstock should be provided in the manhole in which the flow control device is located. 	<p><u>Interceptors</u> and <u>bioretention areas</u> have been incorporated into the drainage design and will intercept surface water before discharge to the piped network.</p> <p>The site's adjacency to an <u>existing watercourse</u> and the presence of the <u>riparian zone</u> are noted. The design of the development as it has progressed from the Section 247 meeting to this Planning Application includes a shift of the buildings this part of the site away from the watercourse to the south. As shown from the image below:</p> <ul style="list-style-type: none"> • Within 15 metres of the watercourse development is limited to SuDS features and water services infrastructure, which are generally synergistic. • Between 15 and 20 metres of the watercourse, the pedestrian/cycle path is present and incidental residential front open space. No 'structures' are proposed. • The closest dwelling is approximately 20 metres from the watercourse.

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		<p>4. The lack of evidence in the <i>Ecological Impact Statement</i> that the watercourse is used by protected species; and</p> <p>5. The need to achieve an appropriate scale and density of development on-site, whilst complying with various other development management criteria.</p> <p>Additionally, we draw the Council's attention to the fact that Planning Permission was previously Granted for dwellings abutting the stream. Please refer to the extract from the <i>Site Layout Plan</i> drawing of Reg. Ref. 20/362 below. <u>Therefore, current proposal is an improvement to the configuration of this part of the site.</u></p> <div data-bbox="1048 628 2018 1209"> </div>

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		<p>pedestrian path gives utility and amenity value to the space, with dwellings respectfully distanced.</p> <p>The design of the surface water network includes <u>nature-based SuDS</u>, such as: swales, tree pits and bioretention area / rain garden. Flow control devices are proposed as part of the surface water infrastructure network and are included on DBFL's <i>Site Services Layout</i>.</p>
K – Part V	Any future application should address the comments (outlined in the attached Opinion Report) of the Housing Department.	<p>We understand that the Housing Department comments are those that come under the 'Part V' section in the <i>LRD Opinion Planner's Report</i>.</p> <p>These relate to the number/percentage of units to be provided for Part V, the design of dwelling (tenure blind), pepper potting their dispersal across the site, delivery in accordance with phasing, etc. The Applicant is happy to agree with these principles in general, but notes that the ultimate Part V provision and allocation is contingent on a Grant of Planning Permission and the agreement reached with the Housing Department at that juncture.</p> <p>At the current time, the Part V proposal is per the enclosed <i>Part V Proposal</i> document collated by TOC.</p>
L – Environmental Impact Assessment and Appropriate Assessment	All relevant information and documentation to comply with the requirements of Environmental Impact Assessment and Habitats Directives should be submitted.	<p>In accordance with relevant legislation and in respect of the development proposed as part of this Planning Application, JBA Consulting have prepared an updated <i>EIA [Environmental Impact Assessment] Screening Report</i> and Openfield have prepared an updated <i>Screening Report for Appropriate Assessment</i>.</p> <p>These are available for review under separate cover.</p>
M – Construction Environmental Management Plan	A detailed Construction Environmental Management Plan should be submitted which should include details as to how water quality in adjoining streams would be protected, in particular during the construction phase of the proposed development.	A <i>Construction and Environmental Management Plan</i> (CEMP) has been prepared by DBFL and is enclosed as part of the Planning Application under separate cover.