



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 1.19 Ha at
Belgard Square East, Belgard Road and Old
Blessington Road, Tallaght, Dublin 24

On Behalf of Midsal Homes Limited

November 2025

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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 Midsal Homes Limited² (the Applicant) in respect of a Planning Application for a Large-scale Residential Development (LRD) submitted to South Dublin County Council (SDCC). In summary, and principally, the LRD comprises 199 No. residential units and 2,123 sq m of floor space for various non-residential uses at a site totalling approximately 1.19 Ha at Belgard Square East, Belgard Road and Old Blessington Road, 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: Donnelly Turpin Architects³ (DT), Torque Consulting Engineers⁴ (Torque), NRB Consulting Engineers⁵ (NRB), Bruton Consulting Engineers⁶, Renaissance Engineering⁷ (Renaissance), Veelite⁸, The Tree File⁹, Studio Glasú¹⁰, DNV¹¹, 3D Design Bureau¹² (3DDB), AWN Consulting¹³, Wave Dynamics Acoustic Consultants¹⁴, ISM¹⁵, Lawler Sustainability¹⁶, Purser¹⁷, O'Dwyer & Jones Design Partnership¹⁸ and IAC¹⁹. Therefore, this report **must** be read in tandem with these materials.

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¹⁸ No. 28 Leeson Park, Dublin 6

¹⁹ Unit G1, Network Enterprise Park, Kilcoole, Co. Wicklow

1. PROCEDURAL

LRD Item No.	Response
The Design Statement lists the internal amenity area for the Senior Living Units as 114sqm whereas the Description of Development lists it as 252.6sqm, which appears to be a combination of both the internal and external space provided. This should be clarified for the final application.	<p>For clarity, the Block A / Senior Living communal amenity space is comprised of the following:</p> <ul style="list-style-type: none"> • Internal amenity – 114 sq m <ul style="list-style-type: none"> ○ 114 sq m, centrally located at first floor level. • External amenity – 189 sq m <ul style="list-style-type: none"> ○ 139 sq m, as a covered space accessed immediately off the main public plaza ○ 50 sq m, at first floor levels facing south • Total – 303 sq m <p>Please refer to Section 7.8.2 of Thornton O'Connor Town Planning's <i>Planning Report and Statement of Consistency</i>, the full suite of landscape architecture materials prepared by Studio Glasú and DT's series of architectural drawing and <i>Architectural Design Statement</i>.</p>
A statement of consistency with the South Dublin County Development Plan 2022-2028 policies shall be provided.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .
All plans (site, floor, elevations, sections etc.) and supporting documentation should be updated from 'Blessington Road' to 'Old Blessington Road'.	This correction has been made to all documents.
The discrepancy on the 'Proposed Ground Floor Plan' (Drawing no. P03_01) regarding the labelling of the senior living accommodation amenity area shall be rectified	This correction has been made.
Any discrepancies across the floorspace figures, percentage breakdowns etc, (particularly those highlighted in red in Table 1 above) shall be corrected.	Consistency of figures has been achieved.

2. URBAN DESIGN AND GENERAL LAYOUT

LRD Item No.	Response
<p>Plot Ratio</p> <ul style="list-style-type: none"> • Further justification for the proposed plot ratio, having specific regard to the criteria set out in Section 2.6.1 of the Local Area Plan. 	A detailed justification in support of the proposed plot ratio has been prepared. Please refer to Sections 7.3.1 and 7.4 of Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .

LRD Item No.	Response
<p>Street Frontages</p> <ul style="list-style-type: none"> • <u>Belgard Road Frontage</u> <ul style="list-style-type: none"> ○ The addition of the 'enclosed' bicycle shelter at ground floor level on the junction of Belgard Road and the Old Blessington Road and the subsequent loss of an active street front on this prominent junction significantly reduces the quality of the design and the proposal's relationship with the adjoining streets and should be revisited. ○ The use of high-level highlight windows on the most prominent corner (i.e. junction of Belgard Road and the Old Blessington Road) reduces the quality of the final design and requires further attention. ○ Concerns are also raised over the volume of solid brick walls on the eastern elevation of Block A. Further articulation in the form of additional fenestration is needed to break this up. ○ Whilst the use of varied material finishes to break up the monotony of the balconies is welcomed, concerns are, however, raised over the potential for the solid material finish to tarnish and peel over time. The balconies should be either limited to the glass/ open railing finish or alternatively, additional evidence should be provided to show how these solid balconies will weather over time. This is relevant across all elevations. 	<p>The following responses have been provided by DT. Note that they are a repetition of the responses they provided in their enclosed <i>Architectural Design Statement</i>.</p> <p><u>Belgard Road Frontage</u></p> <ul style="list-style-type: none"> ○ <i>"At ground floor level</i> <i>The secure bicycle enclosure previously indicated on the junction of Belgard Road and Old Blessington Road has been relocated and the bicycle provision redistributed across the reconfigured ground floor plan within the secure car park. The bicycle enclosure is replaced by a proposed new retail unit (No. 17) measuring 69sq.m. that will provide active street frontage to both Belgard Road and Old Blessington Road, thereby improving the visual appearance as well as providing additional shop frontage, vibrancy and vitality. The entrance to the adjacent apartment core FFS-03 has been reconfigured as part of this amendment to help maximise the size of the unit.</i> <p><i>At the upper levels</i> <i>The previous high level horizontal windows have been replaced with a new configuration of window openings to address the concerns raised in relation to the volume of solid brick on the eastern elevation of Block A. The proposed new window openings are designed to be larger and in keeping with those openings on the other elevations, thereby reducing the extent of the volume of solid brick. The openings are staggered in plan across each floor to create visual interest on the corner and to break free of the more repetitive arrangement along the main elevation to Belgard Road.</i></p> <p><i>To address the concern in relation to the longevity of the painted finish to the solid metal panels on the balconies, the design of these balconies has been amended to include either factory painted slatted metal type or glass balustrades. The material finish is selected to provide variation and in response to their location, orientation and floor level."</i></p>

LRD Item No.	Response
<ul style="list-style-type: none"> • <u>Old Blessington Road Frontage</u> <ul style="list-style-type: none"> ○ The addition of the 'enclosed' bicycle shelter on the junction of Belgard Road and the Old Blessington Road and the subsequent loss of an active street front on this prominent junction significantly reduces the quality of the design and the proposal's relationship with the adjoining streets and should be revisited. ○ The position of the landlord's plant room and the resulting elevational treatments to the street should be given further consideration. • <u>Belgard Square East</u> <ul style="list-style-type: none"> ○ Concerns are raised over the dominance of 'back of house' areas along this elevation. As noted above, this frontage is identified as one of the 'mixed use' frontages for the Centre Neighbourhood. Further consideration should be given to a) the treatment of the car park and bicycle store to enliven this elevation and b) whether the substations and meter rooms can be relocated to the service lane and c) whether the stair core entrance can be improved to read as a more prominent entrance point, (d) further justification should also be provided as to why the lack of mixed use frontage outlined in Figure 3.2 of the LAP should be accepted. ○ The use of high-level highlight windows at the junction of Belgard Road East and the Old Blessington Page 27 of 60 Road reduces 	<ul style="list-style-type: none"> • <u>Old Blessington Road Frontage</u> <ul style="list-style-type: none"> ○ <i>"At ground floor level Concern is raised in relation to the position of the landlord plant room and its impact on this elevation. This is noted, however, an ESB metering room is required in the immediate vicinity of the stair/lift core serving the apartments above which are accessed directly from this core. The ESB meter room must be located on an external wall to facilitate external ESB access and the landlord switchroom and 'comms.' rooms which it serves are required to be located immediately adjacent to this room. An escape route from the car park is also required at the north east corner to comply with Fire Regulations. Therefore, the layout of this corner has been carefully planned to meet all of these requirements with a minimal 'solid' wall frontage as is practical."</i> • <u>Belgard Square East Frontage</u> <ul style="list-style-type: none"> • <i>"At ground floor level In response to the concern raised over the dominance of 'back of house' areas along this elevation, the ground floor plan and the elevation between the car park entrance and the creche has been re-designed to add a proposed new café unit. This new unit no. 16 measures 57 sq.m. and provides an additional 6 metres of glazed active street frontage. It is important to note that the street frontage cannot extend further than what has been currently designed, otherwise the minimum fresh air intake, which is required for the car park ventilation to comply with the current Fire Regulations, cannot be achieved.</i> <i>At the upper levels Concern is raised in relation to the quality of the high level horizontal windows at the junction of the Belgard Road East and Old Blessington Road. These high level windows have been omitted in the proposed new design as part of a re-design of this corner of the building to incorporate additional 3-bed units to comply with Objective RE 2 of the Tallaght LAP (although we note this requirement in the LAP is no longer in place having regard to the publication of the Planning Design</i>

LRD Item No.	Response
<p>the quality of the final design and requires further attention.</p> <ul style="list-style-type: none"> Any proposed signage should be detailed in the final application, in accordance with Section 12.5.7 and Table 12.19 of the 2022-2028 County Development Plan. The final application should ensure consistency and accuracy across all plans and documentation related to the proposed scheme. All elevations must be presented clearly and legibly, avoiding visual clutter that may hinder assessment. Where specific colours or materials are proposed for external treatments, these should be explicitly identified. Elevations of all building sides should be provided, including internal elevations addressing podium or courtyard areas. 	<p><i>Standards for Apartments, Guidelines for Planning Authorities in July 2025, which removes prescriptive requirements for dwelling mixes in statutory plans.</i></p> <p><i>Similar to the concerns raised with regard to longevity of the painted finish to the solid metal panels on the balconies along the Belgard Road frontage, the proposed balustrades along the Belgard Square East frontage have been amended to incorporate either painted slatted metal type or glass balustrades.”</i></p> <ul style="list-style-type: none"> <i>“No signage is proposed as part of this Planning Application. However, dedicated signage fascia panels are integrated into the proposed elevations to control the extent and orderly placement of the future signage that will be required by each of the tenants. The setting out of a clear signage strategy has been carefully considered to meet the objectives set out in Policy QDP7: High Quality Design – Street Frontage in SDCC’s Development Plan.”</i> <i>“All drawings have been carefully updated and checked to ensure consistency and accuracy across all plans and documentation related to the proposed scheme.</i> <p><i>Elevations of all building sides have been provided, including internal elevations addressing podium and courtyard areas.”</i></p>

3. HOUSING AND RESIDENTIAL AMENITY

LRD Item No.	Response
<p>Separation Distances</p> <ul style="list-style-type: none"> Additional sections showing how overlooking between the units addressing the communal amenity courtyard will be avoided, with details of any screening features needed, provided in full. 	<ul style="list-style-type: none"> The following response has been provided by DT. Note that it is a repetition of the response they provided in their enclosed <i>Architectural Design Statement</i>.

LRD Item No.	Response
<ul style="list-style-type: none"> Further consideration should be given to the impacts of the adjoining restaurant and drive thru on the amenity of the units on the southern elevation of Block A, particularly those on the lowest levels closest to the drive thru lane itself/ the delivery area. Appropriate mitigation should be provided. 	<p><i>"The issue of overlooking between windows/balconies on the southern elevation of block B and those on the western and eastern elevations is addressed in Donnelly Turpin Architect's drawing no. P03-32. Steel framed screens measuring 1.8m in height and with translucent glass infill, have been designed to provide privacy to the external private balcony spaces where they occur in closest proximity to one another. The use of translucent safety glass ensures that natural light into the apartment interior is not eliminated and this also reduces overshadowing of the balcony itself."</i></p> <p>We also direct the Council to Section 7.7 of the <i>Planning Report and Statement of Consistency</i> prepared by Thornton O'Connor Town Planning.</p> <ul style="list-style-type: none"> Please refer to the response below relating to noise.
<p>Noise</p> <ul style="list-style-type: none"> An updated Acoustic Report which: - Includes additional noise surveys along southern boundary to establish the likely noise impacts from the adjoining drive thru lane and restaurant (including noise from its associated external plant equipment and loading area) on the proposed development and identify any mitigation measures necessary to the apartments/amenity areas to address these impacts. This is particularly important for the units on the southern elevation/ those overlooking the roof of the internal amenity space of Block A given the limited setback between these units and the drive thru lane/restaurant. Given the 24 hour nature of the restaurant, it is recommended that these surveys are conducted during both weekdays and at the 	<ul style="list-style-type: none"> Given the highly technical nature of this item, we direct the Council to Wave Dynamics Acoustics Consultants' enclosed <i>Acoustic Design Statement</i>. However, we note that the report concludes <i>"...that the internal and external noise levels will achieve the targeted noise levels in line with BS 8233:2014 and ProPG 2017 guidance."</i>

LRD Item No.	Response																																				
<p>weekend and that they cover the full 24 hour window of any day surveyed.</p> <ul style="list-style-type: none"> ○ Takes into account the proposed opening hours of the non-residential uses, particularly those of the bar, restaurant, cafes etc. and identifies any mitigation measures necessary to support these hours <ul style="list-style-type: none"> • Full details of opening times for each of the proposed non-residential uses. This is particularly relevant to those units likely to be open late into the night such as the off-licence and bar/restaurant, to ensure that the residential amenity of the residents remains protected. 	<ul style="list-style-type: none"> • In terms of the operational hours of the proposed non-residential uses, the following are proposed. However, these are <u>indicative</u> at the current time and intended to guide the assessment of noise impacts and servicing for planning-stage. Final hours of operation can be agreed with the Council by way of condition prior to the occupation of the units as this will be the stage at which occupants and operators will be known. <table border="1" style="margin-top: 20px;"> <thead> <tr> <th>Unit</th> <th>Use</th> <th>Floor Area (sq m)</th> <th>Hours of Operation</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Dentist</td> <td>72</td> <td>Monday – Friday 8.00 to 20.00 Saturday / Sunday 9.00 to 17.00</td> </tr> <tr> <td>2</td> <td>Medical</td> <td>210</td> <td>Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00</td> </tr> <tr> <td>3</td> <td>Bicycle Repair and Sales</td> <td>81</td> <td>Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00</td> </tr> <tr> <td>4</td> <td>Class 1 / Class 2 Commercial</td> <td>64</td> <td>Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00</td> </tr> <tr> <td>5</td> <td>Off Licence</td> <td>64</td> <td>Monday – Thursday 10.00 to 00.00, Friday / Saturday 10.00 to 01.00 and Sunday 12.00 to 00.00</td> </tr> <tr> <td>6</td> <td>Retail</td> <td>71</td> <td>Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00</td> </tr> <tr> <td>7</td> <td>Bar</td> <td>151</td> <td>Monday to Friday 10.00 to 00.30 and Saturday / Sunday 10.30 to 01.30</td> </tr> <tr> <td>8</td> <td>Class 1 / Class 2 Commercial</td> <td>101</td> <td>Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00</td> </tr> </tbody> </table>	Unit	Use	Floor Area (sq m)	Hours of Operation	1	Dentist	72	Monday – Friday 8.00 to 20.00 Saturday / Sunday 9.00 to 17.00	2	Medical	210	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	3	Bicycle Repair and Sales	81	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	4	Class 1 / Class 2 Commercial	64	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	5	Off Licence	64	Monday – Thursday 10.00 to 00.00, Friday / Saturday 10.00 to 01.00 and Sunday 12.00 to 00.00	6	Retail	71	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	7	Bar	151	Monday to Friday 10.00 to 00.30 and Saturday / Sunday 10.30 to 01.30	8	Class 1 / Class 2 Commercial	101	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00
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LRD Item No.	Response				
	9	Café	87	Monday – Sunday 8.00 to 00.00	
	10	Class 1 / Class 2 Commercial	89	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	
	11	Crèche	350	Monday – Friday 7.00 to 19.00 and Saturday 8.00 to 14.00	
	12	Pharmacy	195	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	
	13	Beauty/Health Salon	195	Monday – Friday 8.00 to 21.00 and Saturday / Sunday 9.00 to 18.00	
	14	Retail	134	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	
	15	Class 1 / Class 2 Commercial	133	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	
	16	Retail	57	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	
	17	Retail	69	Monday – Friday 8.00 to 20.00 and Saturday / Sunday 9.00 to 17.00	

4. RESIDENTIAL ACCOMMODATION

LRD Item No.	Response
Full compliance with the County Development Plan and relevant guidelines, on foot of any alterations to the scheme implemented as a result of this opinion report.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> and the <i>Architectural Design Statement</i> including its <i>Compliance Schedules</i> prepared by DT.
Demonstrate that the apartments in the scheme comply with the 'Sustainable Urban Housing: Design Standards for New Apartments' (2023) requirements for dual aspect in apartments, and the provision of dual aspect units should be maximised. In addition, no single aspect north facing units should be provided; the proposal of such is unacceptable to the Planning Authority. The orientation of any single aspect apartment should be detailed in full. There are currently some discrepancies in the schedule with relation to the orientation description. These should be rectified.	<p>Of the 199 No. proposed dwellings, 109 No. are dual aspect; equivalent to 55%.</p> <p>This exceeds the minimum requirements of both 33% of units in "<i>central and accessible urban locations</i>" and 50% of units in "<i>suburban or intermediate locations</i>" to be dual aspect, as was prescribed by SPPR 4 of <i>Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2023)</i></p> <p>However, these Guidelines have been superseded by <i>Planning Design Standards for Apartments: Guidelines for Planning Authorities (July 2025)</i>, which includes SPPR 3:</p>

LRD Item No.	Response
	<p><i>"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <ul style="list-style-type: none"> <i>(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.</i> <i>(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."</i> <p>The provision of dual aspect units exceeds the minimum of 25% established by SPPR 3.</p>

5. UNIT MIX

LRD Item No.	Response
Demonstrate compliance with Policy H1 Objective 12 of the South Dublin County Development Plan 2022–2028 and Objective RE2 of the LAP. Where the applicant does not intend to comply with this objective, a robust rationale and defence of the unit mix will be required.	Please refer to Section 7.5 in Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .

6. PART V

LRD Item No.	Response
Proof of date of purchase of the site in February 2021 in order to confirm Part V obligation for the development.	Please find a letter enclosed confirming the date of purchase of the site as 19 th February 2021.
The applicant is advised to engage directly with the Housing Department regarding their proposal for Part V - note that it is the preference of SDCC to acquire units on site.	Engagement with the Housing Department did not take place prior to the lodgement of the Planning Application. However, in accordance with legislation, the <i>Part V of the Planning and Development Act 2000 Guidelines</i> and <i>Part V Resource Pack 4th Edition Concluding Part V</i>

LRD Item No.	Response
	<i>Agreements</i> , the statutorily required materials have been submitted to the Council (see below).
Submit full details of Part V as part of the final application.	<p>Please find the following enclosed:</p> <ol style="list-style-type: none"> (1) The drawing titled <i>Proposed Part V Units</i> (No. Po3_30), prepared by DT, which identifies the number (20 No. (10% of 199 No.)) and location of units to be made available to comply with Part V requirements. (2) Costings associated with the proposed Part V units. See the <i>Part V Proposal</i> document prepared by MMP. (3) The above-mentioned letter from Dillon Eustace confirming the date of purchase of the site.

7. CRÉCHE

LRD Item No.	Response
Whilst it is agreed that babies and young children are unlikely to reside within the senior living units, the same conclusion cannot be reached over the 1 bed units and for this reason, it is recommended that for the final application, the 36 1 bed units be reinstated into the requirement calculation and the figures re-run.	<p>We note that the <i>Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025)</i> explicitly states that studio and 1-bed units (and some or all of the 2-bed units) may be omitted from considerations in relation to the generation of childcare requirements. Page 27 states:</p> <p><i>"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any on-site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms."</i></p> <p>This same policy principle featured in previous iterations of the Guidelines and is present in in a similar form in Section 12.8.4 of the Development Plan.</p> <p>Notwithstanding this, in the enclosed <i>Social Infrastructure Audit</i> we have estimated the childcare requirement based on the ratio of 20 No. childcare places per 75 No. units as applied to the total 150 No. 'standard' (i.e. not senior living) dwellings. This ratio features in the above-mentioned Guidelines and Development Plan. The resulting childcare requirement is determined as 40 No. places.</p>

LRD Item No.	Response
	<p>However, we also undertook an assessment that considered demographics and spatial location, which the above-mentioned Guidelines, the Development Plan and the <i>Childcare Facilities Guidelines</i> (2001) permit. We demonstrate that an estimated 35.2 No. children aged 0–6 years will reside at the proposed development; a figure that is less than the blunt approach of applying the 20:75 ratio. Notwithstanding this, we delved deeper into the demographics and childcare preferences of the of parents/guardians, with census data illustrating that only 22% of pre-school children attend a 'childcare facility'. Applying this 'demand' figures to the 35.5 No. younger children that may reside at the development yields an estimated childcare 'demand' for 8 No. childcare places.</p> <p>Based on the proposed childcare facility's capacity for approximately 70 No. children, it will be amply sized to cater for the childcare requirements generated by the development as well as being able to accommodate existing need in the local community.</p> <p>Please refer to the enclosed <i>Social Infrastructure Audit</i> for further insights.</p>
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 may also wish to engage the SDCC Childcare Committee and Architects department with regard to same.	In response to this item, we refer the Council to the above response and to Section 4.2 (and specifically Section 4.2.2) of the enclosed <i>Social Infrastructure Audit</i> . We contend that the proposed childcare facility is compliant and adequately sized to meet the childcare requirements (and demand) generated by the proposed development.

8. OPEN SPACE AND GREEN INFRASTRUCTURE

LRD Item No.	Response
<p>Public Open Space</p> <ul style="list-style-type: none"> • Either <ol style="list-style-type: none"> a) Demonstrate how the needs of children and young people can be met on site and to demonstrate how the proposal can contribute in terms of biodiversity within the POS space identified on site. OR: 	<p>In response to both parts of this LRD item, the Design Team made notable revisions to the landscape strategy of the proposed development. This included the introduction of bespoke play features, additional seating, more trees, further planting and planters, etc. The intention was to increase the greening of the space and both its functionality and inclusivity.</p> <p>As part of refining and then verifying the approach taken, members of the Design Team took part in a follow-up meeting on 8th August 2025 (after the LRD Meeting) with the Public Realm</p>

LRD Item No.	Response
<p>b) To contribute to the upgrade of an existing nearby park to fulfil the necessary community needs of the residents.</p> <ul style="list-style-type: none"> Liaise with the Public Realm Team on the options discussed above before formally submitting any application. 	<p>Team, taking the opportunity to present the altered proposal. We are of the opinion that the amended landscape proposal was positively welcomed by the Council representatives. Consequently, it has been pursued as an integral part of the Planning Application.</p> <p>We direct the Council to the full landscape pack prepared by Studi Glasú and submitted herewith.</p>
<p>Communal Open Space</p> <ul style="list-style-type: none"> Provide full details of how this space will be managed. 	<p>Please refer to the <i>Landscape Strategy</i> prepared by Studio Glasú and the <i>Building Lifecycle Report</i> prepared by Thornton O'Connor Town Planning. However, the ultimate management and maintenance of the proposed communal amenity space will be defined by a future management company and guided by a <i>Property Management Plan</i> that they will prepare prior to occupation of the proposed development. This Plan will provide guidance with respect to maintenance routines, access to the space, hours of use, etc.</p>
<p>Private Open Space</p> <ul style="list-style-type: none"> Ensure that the size of each of the balconies should align with those set out in the apartment guidelines and should be designed in such a way as to provide appropriate levels of amenity for its users. 	<p>The minimum standards with respect to private amenity space have been met and exceeded across the development, with minimum depths of at least 1.5m for balconies and terraces. Buffer planting and hedging is proposed around balconies and terraces interfacing with public areas to provide greater privacy and screening, muffle noise, create defensible space, define public versus private, aid biodiversity and enhance aesthetics.</p> <p>Balconies and terraces open out from living areas.</p>

9. TREES/LANDSCAPING

LRD Item No.	Response
<p>Adequate provision shall be made to offset the vegetation lost to support the proposal and adequately justified.</p>	<p>A detailed planting regimen has been proposed by Studio Glasú. This is detailed on their suite of landscape architecture drawings. Additionally, we direct the Council to their <i>Landscape Strategy</i> document. Notably, the planting proposal includes 38 No. trees, including Scots Pine and Silver Birch.</p>
<p>The applicant is encouraged to discuss the information shown on the Landscape Plans in detail with the Public Realm Team in advance of the final submission.</p>	<p>The Design Team reflected upon the LRD Meeting and the content of the <i>LRD Opinion</i>, making a series of changes to the proposed landscape and public realm strategy. These changes are highlighted in Studio Glasú's enclosed materials, but include: an increase in</p>

LRD Item No.	Response
	<p>planting throughout the development, greater inclusion of trees, introduction of age-friendly features (play, seating, etc.).</p> <p>A meeting was held with Laurence Colleran of the Council's Parks Department and representatives of the Design Team on 8th August 2025 via Teams to discuss the principles of the updated proposal. Without prejudice, we note that the Parks Departments was accepting of the revised strategy and welcomed its various updates as positive responses to the feedback issued.</p>

10. SUSTAINABLE MOVEMENT

LRD Item No.	Response
Works for the relocation of all traffic signs outside of the development is to be for the written agreement of the Planning Authority. Cost of such relocation to be borne solely by the applicant.	<p>Response provided by NRB:</p> <p><i>"The applicant notes the requirement that any works associated with the relocation of traffic signs outside of the development site are to be subject to the written agreement of the Planning Authority. We also acknowledge and accept that all associated costs for such relocation will be borne solely by the applicant."</i></p>
The location, design and construction details of alterations to the existing pedestrian crossings to be constructed by the applicant/developer and at their own expense shall be for the written agreement of the Planning Authority.	<p>Response provided by NRB:</p> <p><i>"The applicant notes that the location, design, and construction details of all alterations to the existing pedestrian crossings shall be subject to the written agreement of the Planning Authority. We further confirm that such works will be undertaken by the applicant/developer and at their own expense."</i></p>
A layout showing a cycle link to the north of the development along Old Blessington Road.	<p>Response provided by NRB:</p> <p><i>"The layout has been updated which shows a cycle link to the north of the development along Old Blessington Road. It should be noted that a cycle link to the north of the development is not indicated on the BusConnects proposals, and this proposed cycle track should be tied into the upgraded Belgard Square East / Old Blessington Rd Signal junction and Belgard Road / Old Blessington Rd Signal junction as part of the NTA's BusConnects scheme."</i></p>

LRD Item No.	Response
<p>A revised layout to include the removal of the left-turn slip road from Belgard Road onto Blessington Road to reflect the current preferred Bus Connects design at this location.</p>	<p>Response provided by NRB:</p> <p><i>"Discussions have taken place between the applicant's representatives, SDCC, and the NTA (see Appendix R) regarding the proposed removal of the left-turn slip road. The applicant's representatives highlighted that, as the BusConnects scheme has already been granted planning permission, any infrastructure delivered in these locations may ultimately be superseded by future modifications under the NTA BusConnects scheme. This presents a risk that works undertaken at significant cost by the applicant could subsequently be removed and reconstructed, resulting in wasted resources and potential public criticism. Following liaison with both the NTA and SDCC, SDCC confirmed that they had consulted the NTA on the proposals for the LRD at Belgard. On this basis, the NTA indicated they were satisfied for the requirement for the removal of the slip lane to be omitted"</i></p>
<p>A revised layout showing the line/road marking to allowing vehicles access the developments car park.</p>	<p>Response provided by NRB:</p> <p><i>"A revised layout showing the line/road markings to facilitate access to the development's car park has been provided, including a yellow box at the development access to facilitate easier right turn movements into the site."</i></p>
<p>A layout showing the SDCC active travel cycle link to the east of the development along Belgard Road. Especially the vehicle access points and pedestrian crossings.</p>	<p>Response provided by NRB:</p> <p><i>"The Tallaght to Clondalkin Cycle scheme commences at Cookstown Road to the north and finishes at Old Blessington Road junction just to the northeast of the site. As per the response to Item 4, the requirement to remove the left turn slip lane is no longer sought by SDCC and the NTA. The Tallaght to Clondalkin Cycle shows this left slip lane removed, and therefore this will be delivered by the NTA through the Tallaght to City Centre BusConnects scheme. The existing raised cycle track is to be retained on the Belgard Road, but with modifications proposed to facilitate both the proposed pedestrian crossing and service access."</i></p>
<p>Prior to commencement of development, the applicant shall submit a developed Construction Traffic Management Plan for the written agreement of the Planning Authority.</p>	<p>Response provided by NRB:</p> <p><i>"An Outline Construction Traffic Management Plan, is included as part of this application, and includes a description of the proposed construction works and how traffic will be managed for the duration of the demolition and construction works on site. The methodology set out in this report, follows the methodology as will be set out in the developed Site Specific Construction</i></p>

LRD Item No.	Response
	<i>Stage Management Plan which will be prepared and submitted for the written agreement of the Planning Authority when a Contractor is appointed for the works."</i>
At the final stage of design, the applicant shall submit a road safety audit.	Response provided by NRB: <i>"An Stage 1 Road Safety Audit, together with the Designer Feedback form, has been undertaken and is included as a separate report as Appendix Q." [emphasis original]</i>
Full details of how the service lane will be operated including how delivery times will be staggered to avoid blockages along the lane and service vehicles attempting to reverse back onto Belgard Road. This document shall also outline how the entrance and exits for the service lane will be marked to prevent motorists using the hardstanding area to the front for parking.	Response provided by NRB: <i>"The service lane will be managed by the site's management team to ensure smooth, safe and efficient operation. Access will be controlled, with staff on hand to allow service vehicles into the yard as required, with access also provided to drivers via code passes or fob access. There is a long service yard, approximately 70m long, with sufficient capacity for 5 – 8 service vehicles. The exit gates will operate automatically, which will minimise delays for those drivers exiting. The entrance and exit points for the service lane will be clearly marked, ensuring the hardstanding area to the front is kept free of parked vehicles. The service lane is designed solely to accommodate servicing requirements for the four non-residential units located within Block A, and as such, vehicle movements along this lane will be limited. Servicing for the remaining non-residential units will be facilitated via the undercroft car park area associated with Block B. A Service & Operational Waste Management Plan is included as Appendix O. This outlines measures to ensure delivery times are appropriately staggered to avoid congestion along the service lane and to prevent vehicles from having to reverse onto Belgard Road." [emphasis original]</i>

11. INFRASTRUCTURE AND ENVIRONMENTAL SERVICES

LRD Item No.	Response
Water Services <ul style="list-style-type: none"> Confirmation of Feasibility (COF) must be submitted to the planning department on lodgement of the planning application. 	<ul style="list-style-type: none"> A Confirmation of Feasibility has been secured from Uisce Éireann. Please refer to the materials prepared by Torque.

LRD Item No.	Response
<ul style="list-style-type: none"> Uisce Éireann does not permit build over of its assets. There are Uisce Éireann assets in within and in close proximity to the subject site including a100mm PVC water pipes. The applicant will need to show the location of these assets on the proposed plans and demonstrate that the proposed development meets Uisce Éireann's separation distances. If separation distances cannot be achieved a Build Near Enquiry must be lodged and a Confirmation of Feasibility from Uisce Éireann's Diversions team will be required. 	<ul style="list-style-type: none"> This is noted. The Design Team reflected upon the design and layout of the proposed development and the position of existing infrastructure. In light of this, a request to divert the mains network to the subject site's north-west was submitted to Uisce Éireann. Per the correspondence received (see the materials prepared by Torque), Uisce Éireann confirmed that "...the proposed diversion can be facilitated". The Applicant was requested to re-engage with the Diversions Team should a Grant of Planning Permission be secured, but prior to commencement of development on-site.
<p>Gas Mains</p> <ul style="list-style-type: none"> It is noted that there is an existing above ground natural gas pressure reduction unit and associated relief vent stack located on the site's eastern boundary fronting Belgard Road. This structure does not appear on any of the documentation submitted. For the final application, full details of what this structure is shall be provided. Confirmation should also be provided from the relevant service provider that this structure can be relocated and any easements related to same identified on relevant plans. 	<ul style="list-style-type: none"> No works are proposed or are needed to this asset. It will be retained in its current location and remain operational, as required. The proposed development, including the landscape proposal, has been designed to incorporate the feature. <p>The Applicant will engage with the service provider / asset manager to determine any required construction stage setbacks to ensure no damage occurs.</p>
<p>Waste</p> <ul style="list-style-type: none"> An Updated OWMP which includes: <ul style="list-style-type: none"> The numbers being used and what the calculations are. The internal and external WSA's and the staging areas. The definition of 'the Operator' at Section 5.7. General clarification on WHO polices the correct segregation of wastes? Under waste 	<p>A fully updated <i>Operational Waste Management Plan</i> (OWMP) and a fully updated <i>Resource Waste Management Plan</i> (RWMP) have been prepared by AWN Consulting. These are enclosed under separate cover for review by the Council.</p> <p>The reports reflect the revised and updated development details, and incorporate the requests of the Councils stated here.</p>

LRD Item No.	Response
<p>management legislation management companies are regarded as the 'waste holder' or 'person in charge' and failure to comply with the legislation would result in enforcement being taken against the management company – so the question is: what procedures are in place and what measures will be taken when the management company identifies any misuse of the waste streams?</p> <ul style="list-style-type: none"> • The RWMP Updated to show: <ul style="list-style-type: none"> ○ Section 6.4 – can the quantities of soil and stone attributed to the excavations of basements be included? ○ Section 6.5 – whilst crushing of bedrock is not envisaged – should it be required any mobile crushing unit will require planning permission in order to apply for a waste facility permit – would advise that applicant include for this in their application. ○ The names of the persons assigned to roles in the plan need to be provided. 	

PARTICULARS REQUIRED

LRD Item No.	Response
<p>1. Updated Development Statistics Table/Schedule of Accommodation to include all items either listed as incorrect or missing throughout this Opinion</p>	<p>This has been provided. We principally refer the Council to DT's <i>Architectural Design Statement</i>, which includes:</p> <ul style="list-style-type: none"> - A 'Schedule of Areas' on page 65. - A 'Schedule of Commercial Areas' on page 66. - A 'Compliance Schedule' (i.e. 'Housing Quality Assessment') starting on page 67.

LRD Item No.	Response
	Further statistics and details are provided in Section 5.1 in Thornton O'Connor Town Planning's <i>Planning Report and Statement of Consistency</i> .
2. Housing Quality Assessment (to include the number, types and individual floor and room areas of each unit; proposed private amenity space (terrace/balcony); internal (and any external) storage space, and the aspect of each proposed apartment, i.e. whether dual or single. In the case of single aspect apartments, the schedule should specify the orientation. Single aspect northern facing apartments should be minimised.	Please refer to DT's 'Compliance Schedule' in their enclosed <i>Architectural Design Statement</i> .
3. Updated Planning Report appropriately justifying any departure from the policies within the South Dublin County Development Pla 2022-2020 and the Tallaght Local Area Plan, 2020, particularly those relating to plot ratio, 3 bed unit mix and mixed-use frontages. Full details of medical centre including staff numbers, support staff numbers and operating hours.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .
4. <u>Schedule of Accommodation</u> a. To include adequate information in relation to the calculation of Development Contributions. b. Section in Planning Report to demonstrate compliance with, or robust justification for not complying with Policy H1 Objective 12/Objective RE2 of the Tallaght LAP .	a. Please refer to DT's 'Schedule of Areas' and 'Compliance Schedule' in their <i>Architectural Design Statement</i> , and the <i>LRD Application Form</i> (Form 19). b. Please refer to Section 7.5 in Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .
5. <u>Architectural Design Statement</u> a. To include details on how 'The Plan Approach' has been followed (see Policies QDP1 and QDP2 of the County Development Plan).	a. Please refer to DT's enclosed <i>Architectural Design Statement</i> .

LRD Item No.	Response
<p>b. The Design Statement shall include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the SDCC Height and Density Guide and the Height Strategy in the Tallaght LAP and each of the other relevant design policies in the LAP.</p>	<p>b. Please refer to DT's enclosed <i>Architectural Design Statement</i> and Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i>.</p>
<p>6. Detailed CGIs of development during summer and winter (trees with and without leaves), with additional views from St Maelruans Church</p>	<p>Please refer to 3DDB's enclosed <i>Verified Views, Aerials and CGI</i> booklet.</p>
<p>7. Updated Sunlight and Daylight Analysis based on any changes to the scheme resulting from this Opinion.</p> <p>a. Minimise / remove single aspect north facing units.</p> <p>b. Assess the development with, and without, trees.</p> <p>c. Assessment of external areas.</p>	<p>a. No single aspect, north-facing units are now proposed.</p> <p>b. and c. Please refer to the 3DDB's enclosed <i>Daylight and Sunlight Assessment Report</i>.</p>
<p>8. Shadow Assessment of existing environment and proposed development.</p>	<p>Please refer to the 3DDB's enclosed <i>Daylight and Sunlight Assessment Report</i>.</p>
<p>9. Green Infrastructure Plan.</p>	<p>Please refer to Studio Glasú's <i>Landscape Strategy</i> document.</p>
<p>10. Green Space Factor Calculations.</p>	<p>Please refer to Section 2.9 of Studio Glasú's <i>Landscape Strategy</i> document.</p>
<p>11. Street Tree Planting Plan.</p>	<p>Please refer to Studio Glasú's <i>Landscape Strategy</i> document, as well as their suite of drawings.</p>
<p>12. Landscape Scheme, to include:</p> <p>a. Landscape Masterplan</p> <p>b. Detailed cross Sections/Elevations through the landscape proposals.</p> <p>c. Planting plan:</p> <p>i. Location of species, types of plants, planting sizes and proposed numbers/densities,</p>	<p>a. Refer to Studio Glasú's <i>Landscape Masterplan</i> drawing, as well as the drawings titled <i>Landscape Detail Area One Street</i> and <i>Landscape Detail Area Two Podium</i>.</p> <p>b. Refer to Studio Glasú's drawings titled <i>Landscape Sections One</i> and <i>Landscape Sections Two</i>.</p> <p>c. Refer to Studio Glasú's <i>Landscape Strategy</i> document for details. Additional specific information can be furnished by way of compliance condition requiring agreement with the Council prior to the commencement of development.</p>

LRD Item No.	Response
ii. Implementation timetables, iii. Proposals for future maintenance/management.	
13. Tree Management Plan to include: a. Pruning and maintenance schedule b. Protection measures c. Monitoring and reporting d. Emergency response plan.	We direct the Council to the following: <ul style="list-style-type: none"> • Studio Glasú's <i>Landscape Strategy</i>; and • The Tree File's <i>Arboricultural Report</i>, and drawings titled <i>Belgard Square Tree Constraints Plan</i>, <i>Belgard Square Tree Impacts Plan</i> and <i>Belgard Square Tree Protection Plan</i>.
14. Tree and Hedgerow Protection & Arborists Report	Please refer to The Tree File's enclosed <i>Arboricultural Report</i> , and drawings titled <i>Belgard Square Tree Constraints Plan</i> , <i>Belgard Square Tree Impacts Plan</i> and <i>Belgard Square Tree Protection Plan</i> .
15. Taking in charge plan detailing all of the public realm areas proposed for taking in charge.	Please refer to DT's enclosed <i>Taking in Charge Site Plan</i> .
16. Ecological Impact Assessment (EclA). Note: Reports in excess of 2 years are unlikely to provide a robust assessment of current site circumstances, and this may reduce depending on the ecological feature of interest. It is recommended that any potential impacts and changes suggested as a result of the findings of ecological surveys at the site are addressed through changes to the proposal, as necessary, in the final application.	Please refer to DNV's enclosed <i>Ecological Impact Assessment</i> . The surveys remain appropriate and valid for the target species and habitats.
17. Stage 1 and 2 Road Safety Audit	Please refer to Appendix Q of NRB's <i>Traffic and Transport Assessment Report</i> . Note that a Stage 1 audit was prepared as this was considered to be adequate for this stage of the project. However, a Stage 2 iteration can be prepared and presented to the Council for approval by way of compliance conditions.
18. Updated Traffic & Transport Assessment (and supporting plans) per the advice of SDCC Roads above.	Please refer to the suite of reports prepared by NRB, including their <i>Traffic and Transport Assessment Report</i> , and its various appendices.
19. SUDs Strategy, to include: a. SUDs Design details. Note, sedum roofs are not preferable to the Planning Authority in the interest of biodiversity.	Please refer to Torque's enclosed <i>Engineering Services Report</i> , in particular its Section 4.0. Additionally, note the design and detail presented in their suite of drawings.

LRD Item No.	Response
<ul style="list-style-type: none"> b. Flow route analysis for site. c. Comprehensive surface water conveyance plan for the site. d. Drawing showing how much surface water is attenuated in m³. Underground attenuation will not be favourably considered. e. Surface water attenuation calculations for proposed development. f. SUDs Layout identifying the different types of SUDs features. g. Demonstrate adherence to SDCC SUDs guidance. h. Drawing showing plan and cross-sectional views of all SuDS features. i. Attenuation from green/blue roofs if proposed should be demonstrated. 	<p>The Council should note that with respect to attenuation at roof level, the approach is to provide blue roofs. This is preferred over a more intensive green roof strategy due to the proposed provision of PV panels thereat.</p>
<p>20. SUDS Management Plan.</p>	<p>Please refer to Torque's enclosed <i>Engineering Services Report</i>.</p>
<p>21. Flood risk mapping and Assessment.</p>	<p>Please refer to Torque's enclosed <i>Flood Risk Assessment Report</i> for a detailed assessment of flood risk at the subject site.</p>
<p>22. Confirmation of Feasibility from Uisce Eireann.</p>	<p>Please refer to the <i>Confirmation of Feasibility</i> appended to Torque's enclosed <i>Engineering Services Report</i>.</p>
<p>23. Statement of Design Acceptability from Uisce Eireann.</p>	<p>We note that a <i>Statement of Design Acceptance</i> from Uisce Éireann is not a statutory requirement for LRD Planning Applications in either the <i>Planning and Development Act 2000</i> (as amended) or the <i>Planning and Development Regulations 2001</i> (as amended). A <i>Confirmation of Feasibility</i> from Uisce Eireann is the statutory requirement per the Regulations, and this is enclosed as part of Torque's reporting.</p> <p>Should a Grant of Planning Permission be forthcoming, a <i>Statement of Design Acceptance</i> will be promptly sought from Uisce Éireann.</p>
<p>24. Appropriate Assessment Screening Report</p>	<p>Please refer to DNV's enclosed <i>Appropriate Assessment Screening Report</i>.</p>
<p>25. Environmental Impact Assessment Report (EIAR) Screening Report.</p>	<p>Please refer to DNV's enclosed <i>EIA Screening Report</i>.</p>
<p>26. Archaeological Impact Assessment and Method Statement.</p>	<p>Please refer to IAC's enclosed <i>Archaeological Assessment</i>.</p>

LRD Item No.	Response
27. Building Lifecycle Report.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Building Lifecycle Report</i> .
28. Community and Social Infrastructure Audit.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Social Infrastructure Audit</i> .
29. Part V Proposals.	<p>Please find the following enclosed:</p> <ul style="list-style-type: none"> (1) The drawing titled <i>Proposed Part V Units</i> (No. Po3_30), prepared by DT, which identifies the number (20 No. (10% of 199 No.)) and location of units to be made available to comply with Part V requirements. (2) Costings associated with the proposed Part V units. See the <i>Part V Proposal</i> document prepared by MMP. (3) The above-mentioned letter from Dillon Eustace confirming the date of purchase of the site. <p>Further insights are detailed in Thornton O'Connor Town Planning's <i>Planning Report and Statement of Consistency</i>.</p>
30. Updated Operational Management Plan per the advice from SDCC Waste Licensing Team.	Please refer to AWN's enclosed <i>Operational Waste Management Plan</i> .
31. Updated Resource Waste Management Plan per the advice from SDCC Waste Licensing Team.	Please refer to AWN's enclosed <i>Resource Waste Management Plan</i> .
32. Construction and Environmental Management	Please refer to AWN's enclosed <i>Construction Environmental Management Plan</i> .
33. Public Lighting Design, to be agreed with the Public Lighting Section in SDCC.	Please refer to Renaissance Engineering's enclosed <i>Outdoor Lighting Report</i> , and the following 2 No. drawings: <i>Lighting Services Ground Floor Site</i> and <i>Lighting Services First Floor Site</i> . The Applicant is willing to accept a condition requiring this to be agreed with the Public Lighting Section of the Council prior to the commencement of development on-site.
34. Public Lighting Proposals.	Please refer to Renaissance Engineering's enclosed <i>Outdoor Lighting Report</i> , and the following 2 No. drawings: <i>Lighting Services Ground Floor Site</i> and <i>Lighting Services First Floor Site</i> .
35. Energy Proposals in line Section 12.10.2 of the County Development Plan & 7.4.5 of the LAP	Please refer to Renaissance Engineering's enclosed <i>Energy Efficiency and Climate Change Adaptation Design Statement</i> .