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Firhouse  
Dublin 24  
D24 XC42

2<sup>nd</sup> June 2021

The Planning Officer  
Planning Department  
South Dublin County Council  
County Hall  
Tallaght

**Planning Application Reference SD21A/0106**

**Planning Application: Demolition of existing child care facility; construction of 2 semi-detached, 3-bed residential units and the reinstatement of existing building back to former 3 bed residential unit; carparking, landscaping and all associated site works.**

**Location: 147, Monalea Grove, Dublin 24**

Dear Planning Officer

I wish to lodge a submission in respect of the above application and include proof of payment of the statutory fee of €20.00 with the e-mail that accompanies this letter. The details of my submission are set out below.

**I. The site boundary on the layout plan is not consistent with the site boundary on the location map and includes an area of open space that is not zoned for residential development.**

The site boundary on the location map submitted appears to align with the existing property boundaries of 147 Monalea Grove. The location map's southern and northern boundaries largely run parallel to each other at a similar angle.

As illustrated in the extracts below, the northern boundary on the layout plan, however, is not consistent with the northern boundary on the location map and includes a section of an existing area of open space. Part of a proposed bin store and area of visitor parking that widens towards the eastern boundary of the layout plan is outside the boundary on the location map. This would take place within an area that is not zoned for residential development under the South Dublin County Council Development Plan 2016 – 2022.

In the event of a further information request, the applicant should be requested to:

- Submit revised layout and location maps that are consistent in terms of the boundaries for the application site;
- Clarify whether it is intended to encroach into the adjacent area of open space and, if so:
  - demonstrate compliance with the zoning objectives of the County Development Plan; and
  - submit a letter of consent from the landowner.

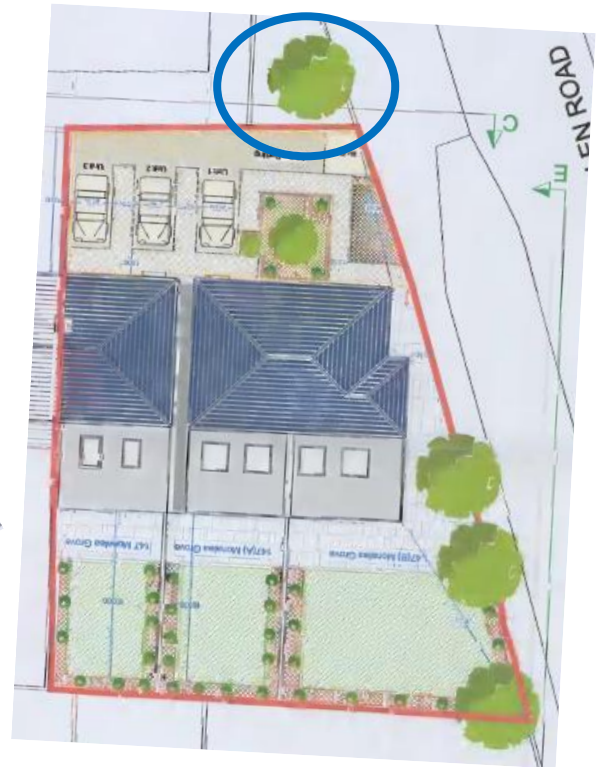
In the event of a grant of permission, it is requested that a condition be attached that:

1. Restricts the proposed development to the boundary indicated on the location map and prohibits any development encroaching on or taking place in the triangular area of open space adjacent to the northern boundary of the application site.

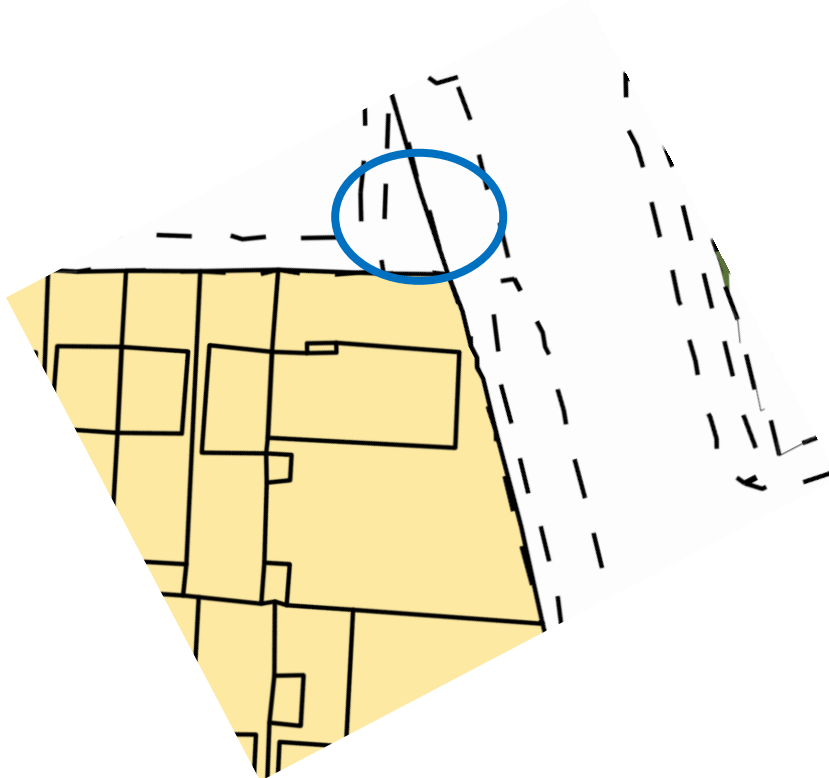
Location Map Boundary

VS.

Proposed Layout Plan Boundary



Extract from SDCC Development Plan 2016 – 2022 Map Highlighting Un-Zoned Area of Open Space



**II. The northern boundary of the application site encroaches into open space occupied by a street light, a group of native trees and a native hedgerow. The footprint of development would require removal of planting and construction would potentially affect the health and viability of remaining planting.**

The existing layout plan submitted with the application indicates that the adjacent triangular area of open space is occupied by one sole street tree. As indicated in the images below, this area is occupied by a mature native beech hedgerow, a group of semi-mature native birch trees, an immature birch tree and a street light.

No details are submitted with the application in terms of the number of street trees and the extent of hedgerow that would be removed. Furthermore, no details are submitted in relation to the how planting would be protected and retained during construction.

The proposed layout plan seeks to locate a bin store and an area of visitor parking that widens towards the eastern boundary of the application site. The footprint of this aspect of development would require the removal of a section of the mature hedgerow, a mature street tree as well as an immature street tree.

The proposed layout plan is also silent on how the proposed development would interface with the remainder of this area in terms of boundary treatment etc, which would likely affect the health and viability of a further section of mature hedgerow and another semi-mature street tree, particularly during construction.

This aspect of the proposal would therefore not be in keeping with the Green Infrastructure (G) Policies 1, 2 and 6 of the South Dublin County Council Development Plan 2016 – 2022 particularly the following related objectives (emphasis added):

*G2 Objective 6: To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries, and increase hedgerow coverage using locally native species.*

*G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.*

*G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species such as those located along the River Dodder.*

*G6 Objective 1: To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.*

The semi-mature and mature planting also provides a noise barrier to the adjacent busy 3 lane Ballycullen Road and contributes to the visual amenity of the cul-de-sac especially when in full flower. In the context of the flooding history of the adjacent cul-de-sac (see Item III below), denuding this soft landscaped area would also reduce the extent of permeable surface area available to mitigate any further flooding. This aspect of the proposal would therefore not be in keeping with the RES zoning objective of the area, which seeks "To protect and/or improve residential amenity".

In the event of a further information request, the applicant should be requested to submit:

- a revised layout plan that clarifies and details the relationship between the proposed development and adjacent mature hedgerow, group of semi-mature street trees and immature street tree. This should include details of proposed boundary treatment and should identify planting including street trees and hedgerow that the applicants propose to remove; and
- a construction method statement and plan for the protection of the adjacent mature hedgerow, group of semi-mature street trees and immature street tree.

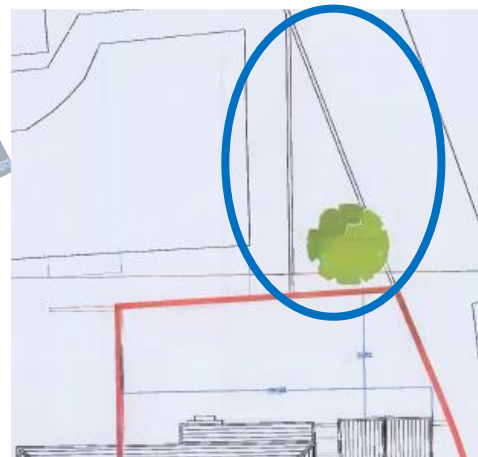
In the event of a grant of permission, it is advised that conditions be attached that:

2. Prohibits the removal of any planting from the triangular area of open space adjacent to the northern boundary of the application site (as indicated on the location map).
3. Requires the applicants to lodge method statements and tree bonds for the protection of the adjacent mature hedgerow, group of semi-mature street trees and immature street tree. A bond should also be required for the protection of the street light.

**Google Maps Image**



**VS. Existing Layout Plan**



**Photograph of Adjacent Area of Open Space Including Planting (April 2021)**



### **Mature, Semi- Mature and Immature Planting within Footprint and adjacent to Proposal**



**III. The cul-de-sac onto which the application site interfaces with was subject to a significant flood event in July 2020 that nearly resulted in the flooding of 146A Monalea Grove. The applicants propose a large hard landscaped area that would drain onto this cul-de-sac and could exacerbate future flooding events.**

The cul-de-sac between 146A and 147 Monalea Grove has flooded extensively approximately 3 times in the last 10 years. The latest flood event occurred in July 2020 and nearly resulted in the flooding of my house at 146A Monalea Grove (see photographs below).

The driveway area for 147 Monalea Grove currently drains onto this cul-de-sac and is largely surfaced with a permeable gravel. The proposed development incorporates a large hard landscaped area with 3 no. car spaces, a visitor parking area that could accommodate approximately 2 additional cars and footpaths. No details are submitted in relation to surface finish and only a small area of soft landscaping is indicated.

The use of impermeable and semi-permeable surface finishes such as concrete, tarmac or cobble lock would increase the extent of run off from the application site compared to the existing situation and would potentially exacerbate future flood events.

This would not be in keeping with the Infrastructure and Environmental Quality (IE) Policies 2, 3 and 5 of the South Dublin County Council Development Plan 2016 – 2022 particularly the following objectives (emphasis added):

*IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.*

*G5 Objective 1: To promote and support the development of Sustainable Urban Drainage Systems (SUDS) at a local, district and county level and to maximise the amenity and biodiversity value of these systems.*

*IE3 Objective 3: To manage flood risk in the County in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PLO2/2014 (August 2014), in particular when preparing plans and programmes and assessing development proposals. For lands identified as being at risk of flooding in (but not limited to) the Strategic Flood Risk Assessment, a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, is required, demonstrating compliance with the aforementioned Guidelines or any updated version of these Guidelines, paying particular attention to residual flood risks and any proposed site-specific flood management measures.*

Further to Item II above, this could also be exacerbated if the the heavily planted soft landscaped along the northern boundary of the application site were to be denuded.

The proposed development does not include any flood risk management or Sustainable Urban Drainage measures and there are no details submitted in relation to surface finishes to the front parking area or in relation to its proposed drainage system.

In the event of a further information request, the applicant should be requested to submit:

- a drainage plan that details the proposed drainage system for the front parking area together with details on the exact nature of proposed surface finishes; and
- details of how it is proposed to comply with County Development Policy to limit surface water run-off and, in the context of the flood history of the adjacent cul-de-sac, how it is proposed manage flood risk.

In the event of a grant of permission, it is advised a condition should be attached that:

4. Prohibits the use of impermeable and semi-permeable surface finishes such as concrete, tarmac or cobble lock in the front parking area including visitor parking; and
5. Requires the incorporation of Sustainable Urban Drainage Systems such as grasscrete in the front parking area including visitor parking.

#### **Flooding in the Cul-De-Sac between 147 Monalea Grove and 146A Monalea Grove (July 2020)**





**IV. There is a long history of development on the application site that does not have the benefit of planning permission. Guarantees should be sought to ensure that any permitted development is carried out in accordance with the requirements of South Dublin County Council.**

In the event of a grant of permission it is requested that a condition be attached that:

6. Requires the applicants to lodge a development bond that seeks to ensure the completion of the development in line with the details submitted by the applicants and the conditions attached to the development.

**V. The description of the proposed development on site and newspaper notices is not consistent. It jointly seeks for the “demolition of existing child care facility” and the “reinstatement of existing building back to former 3 bed residential unit”.**

In the context that the entire building is used as a childcare facility, the use of the building cannot be reinstated after it has been demolished. This would require the construction of an entirely new building in its place with a more intense impact on surrounding dwellings in terms of noise, dust and construction activity particularly for the semi-detached dwelling that adjoins 147 Monalea Grove.

There could also be a significant difference in the levying of development contributions, particularly if they are calculated on the basis of floor area.

It is noted that floor plans submitted appear to indicate that part of the existing building would be demolished, however, the elevations do not indicate the area to be demolished and are therefore not consistent with the floor plans.

In the event of a further information request it is requested that the applicants be require to:

- Clearly indicate whether it is proposed to demolish all or part of the existing building and, if applicable, seek a change of use; and
- Submit revised floor plans and elevations that are consistent with each other in terms of the extent of area to be demolished and, if applicable, the extent of area to which a change of use is sought.

In the event of a grant of permission it is recommended that conditions be attached that:

7. Clarifies the extent of demolition works and, if applicable, the extent of change of use. Condition on the regulation of construction and demolition impacts should also be attached accordingly.

### **Conclusion/Summary**

To summarise, my submission in relation to the proposed development is as follows:

I. The site boundary on the layout plan is not consistent with the site boundary on the location map and includes an area of open space that is not zoned for residential development.

II. The northern boundary of the application site encroaches into open space occupied by a street light, a group of native trees and a native hedgerow. The footprint of development would require removal of planting and construction would potentially affect the health and viability of remaining planting.

III. The cul-de-sac onto which the application site interfaces with was subject to a significant flood in July 2020 that nearly resulted in the flooding of 146A Monalea Grove. The applicants propose a large hard landscaped area that would drain onto this cul-de-sac and could exacerbate future flooding events.

IV. There is a long history of development on the application site that does not have the benefit of planning permission. Guarantees should be sought to ensure that any permitted development is carried out in accordance with the requirements of South Dublin County Council.

V. The description of the proposed development on site and newspaper notices is conflicting and confusing. It jointly seeks for the “demolition of existing child care facility” and the “reinstatement of existing building back to former 3 bed residential unit”.

In the event of a further information request, the applicants should be requested to submit further information in relation to

- The boundaries of the application site;
- Encroachment into the adjacent area of open space;
- The relationship between the development and protection adjacent mature hedgerow, group of semi-mature street trees and immature street tree.;
- The protection of the adjacent mature hedgerow, group of semi-mature street trees and immature street tree;
- The proposed surface water drainage system and details on surface finishes;
- Methodology to limit surface water run-off; and
- The extent of demolition works sought and, if applicable, extent of change of use sought.

In the event of a grant of permission, it is requested that conditions be attached that:

1. Restricts the proposed development to the boundary indicated on the location map and prohibits any development encroaching on or taking place in the triangular area of open space adjacent to the northern boundary of the application site.
2. Prohibits the removal of any planting from the triangular area of open space adjacent to the northern boundary of the application site (as indicated on the location map).
3. Requires the applicants to lodge method statements and tree bonds for the protection of the adjacent mature hedgerow, group of semi-mature street trees and immature street tree. A bond should also be required for the protection of the street light.
4. Prohibits the use of impermeable and semi-permeable surface finishes such as concrete, tarmac or cobble lock in the front parking area including visitor parking; and
5. Requires the incorporation of Sustainable Urban Drainage Systems such as grasscrete in the front parking area including visitor parking.



6. Requires the applicants to lodge a development bond that seeks to ensure the completion of the development in line with the details submitted by the applicants and the conditions attached to the development.
7. Clarifies the extent of demolition works and, if applicable, the extent of change of use. Condition on the regulation of construction and demolition impacts should also be attached accordingly.

Yours faithfully

Louise Browne