

**Private & Confidential**

South Dublin County Council  
Planning Department  
County Hall, Town Centre,  
Tallaght.  
Dublin 24

**ADDITIONAL INFORMATION Reg. Ref. SD21A/0179**

6<sup>th</sup> October 2021

**Re: Removal of selected hedging, the removal of the existing 52 car parking spaces and the construction of a 4-storey apartment building with setbacks at third floor level, total 14 apartments comprising of 1 one-bedroom, 11 two bedroom; 2 three bedroom apartments, all with associated private open spaces areas in the form of balconies; access to the development from existing vehicular and pedestrian entrance from Leixlip Road (R835) and from proposed new vehicular and pedestrian access from Ardeevin Drive; all with associated landscaped courtyard at ground floor level, sedum roof (main roof), bicycle storage, bin storage, signage, associated drainage and site development works (Protected Structure RPS No. 094).**

Dear Sir / Madam,

On behalf of our Client, Gerry Teague, we wish to lodge this response to the Additional Information request from South Dublin County Council, dated 25<sup>th</sup> August 2021. To support this Additional Information submission, we hereby include 6 No. copies of the following documentation:

- **Cover Letter as prepared by CDP Architecture;**
- **Revised Design Statement as prepared by CDP Architecture;**
- **Revised Issue Sheet as prepared by CDP Architecture;**
- **Revised Drawings as prepared by CDP Architecture;**
- **Shadow Analysis Drawings as prepared by CDP Architecture;**
- **Revised Drawings and Document as prepared by Molony Millar Consulting;**
- **Revised Drawings as prepared by Landmark designs Ltd.;**
- **Arboricultural Impact Assessment and Tree Protection plan as prepared by The Tree File Consulting Arborists;**
- **Response from Conservation Officer – email;**

### Further Information Request Item 1 -

*Having regard to the overall height, scale and massing of the proposed development it is considered that the proposal would result in a significantly overbearing impact on the residential developments to the west and east, and protected structure to the north. The proposed development would significantly affect the residential amenity of the existing dwellings and the established residential character and visual setting of the area. The proposed is not in compliance with policies and objectives of the County Development Plan and therefore a redesign shall be provided by the applicant by way of additional information to significantly reduce the height of the building.*

**Response:** With regards to the proposed building height, given the context, the gable form and mass of the existing properties, the set back from the building line of the Protected Structure, the treatment of the proposal, together with the density achieved within this town centre location, it is considered that the proposed height for the development is appropriate in this location.

Moreover, it is clearly outlined in the National Development Plan 2018 – 2027 / Project Ireland 2040 that both the need for housing and the strategy to build the required supply results in the need to build a higher density and scale and in a more compact form within both urban and rural environments. It is on this basis that the subject application should be supported. The application seeks to increase density on an underutilised residential zoned site, which is available for development. Cognisance must be taken of the current housing climate and the need for these types of private developments, in order to meet Government set housing targets and the verified demands.

Although the building has been designed to sit and integrate within its immediate context, design strategies have also been employed to reduce the perceived mass by stepping in from the boundaries and by use of flat roofs throughout the proposal. Consideration must be taken of the current housing climate and the continuous rising house prices in the region. The proposal seeks to suitably increase the density on this site in a positive manner both in terms of proposed end use, sustainability of land use and design. The proposed development successfully reintroduces an underutilised site back into the local community providing a contemporary response to an urban site and if anything would increase the value of properties, in the area.

Furthermore, the **Residential** Building Heights policies within the South Dublin County Council Development Plan 2016 – 2022 states the following; ***'It is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County'***.

Under the various objectives the following should be noted.

***'H9 Objective 1: To encourage varied building heights in new residential developments to support compact urban form, sense of place, urban legibility and visual diversity'***.

The current proposal can be supported on the basis that it provides variety in the existing building height. It contributes to the sense of place while creating visual diversity in that it is contemporary in design, material, and detailing.

***'H9 Objective 2: To ensure that higher buildings in established areas respect the surrounding context'***

The proposal relates to an existing context of which there is a proposed change in height from a 2 storey public house premises to the 4-storey proposal with a setback on the fourth floor, back to a 2-storey dwelling then again to a 3 storey apartment building (The Bramley, The Orchard). This minimal change in building height can be supported based on its minimal impact on the streetscape together with the achievement of a suitable density.

***'H9 Objective 3: To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height)'***

Again, the proposal relates to an existing context of which there is a proposed change in height from a 2 storey public house premises to the 4 -storey proposal with a setback on the fourth floor , back to a 2-storey dwelling. This is considered to be a gradual change, in particular given the set back of the proposal and the overall level of the site level.

***'H9 Objective 4: To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme'***

This objective does not relate to the current proposal for a 4-storey building, with set back on the fourth floor

**Further Information Request Item 2 –**

*It is proposed that 28% of the apartments are to be dual aspect which is below the 33% threshold of SPPR4 of the CDP as an intermediate off street development. Furthermore one of the two bedroom apartments is below the minimum standards. This is not acceptable to the Planning Authority. The applicant is requested to submit a revised proposals meeting all minimum national and County Development Plan standards.*

**Response:** It appears both dual aspect unit's apartment No. 7 at first floor level and apartment No.11 at second floor level have been overlooked in the councils review of dual aspect units (please see below Reference Image 1 which highlights units mentioned) should these units be included the overall percentage of dual aspect units is 43% is above the 33% threshold of SPPR4 therefore the council's assessment of the 28% dual aspect is deemed unfounded. Furthermore, in relation to 'one of the two-bedroom apartments is below minimum standards' all apartments within the development have been examined, however no errors have been found on the original application. We would request that the council re-examine the housing quality assessment from the original applications which demonstrates that all apartments are above minimum standards deeming the council comments unfounded.



*Reference Image 1: highlighting unit no 7 at first floor level (left) and unit no 11 at second floor level (right) highlighted in green which were excluded in the council's calculations of dual aspect units*



### Further Information Request Item 3 –

There appears to be a lack of Public Open Space. The applicant is requested to demonstrate that the proposal meets the requirement of a minimum 10% Public Open Space as required by SDCC County Development Plan 2016-2022. Details of play space proposals to be agreed with the Planning Authority prior to submission. Play Proposals shall include assessable play features. Details of play equipment, and safety surfacing, along with specifications and proof that all play equipment conforms to European Standards EN 1176-1-11 and EN 1177 Playground Equipment and Surfacing shall be submitted as additional information. Confirmation is required on the amount of private open space.

#### **Response:**

Please refer to the revised plans as prepared by CDP Architecture enclosed, note the following modifications

- An increase of green areas have been proposed to the front (North) and back (south) of the development to increase the public open space percentage which is now at 29%. (Please see below Reference Image 2 which indicates open space areas within the proposal)



Reference Image 2: highlighting increase of green area to increase the percentage of public open space

- In relation to details of play space proposal please refer to the revised landscape proposal as prepared by Landmark designs Ltd.

**Further Information Request Item 4 –**

The applicant has not submitted a shadow analysis to indicate impacts with regard to daylighting of individual apartments and overshadowing of adjacent properties and open space areas. This shall be submitted as additional information.

**Response:**

Please refer to the enclosed Shadow Analysis as prepared by CDP Architecture Drawing 3.1.700, 3.1.701, 3.1.702, and 3.1.703, enclosed. The summary of results note the following:

**SUMMARY SHADOW ANALYSIS RESULTS**

**- DECEMBER:**

Note the improvement highlighted in **blue** between the existing site and the current proposal due to the removal of existing shrubbery and trees. Additionally, the highlighted area in **orange** shows the shadow casted by the proposed development which indicates that shadowing only occurs on the existing car park of the Ball Alley which is within the proposal boundary thus no shadow casting occurs towards the existing adjacent developments (please see below reference image 3 of Heights Map in the context of the Subject site)

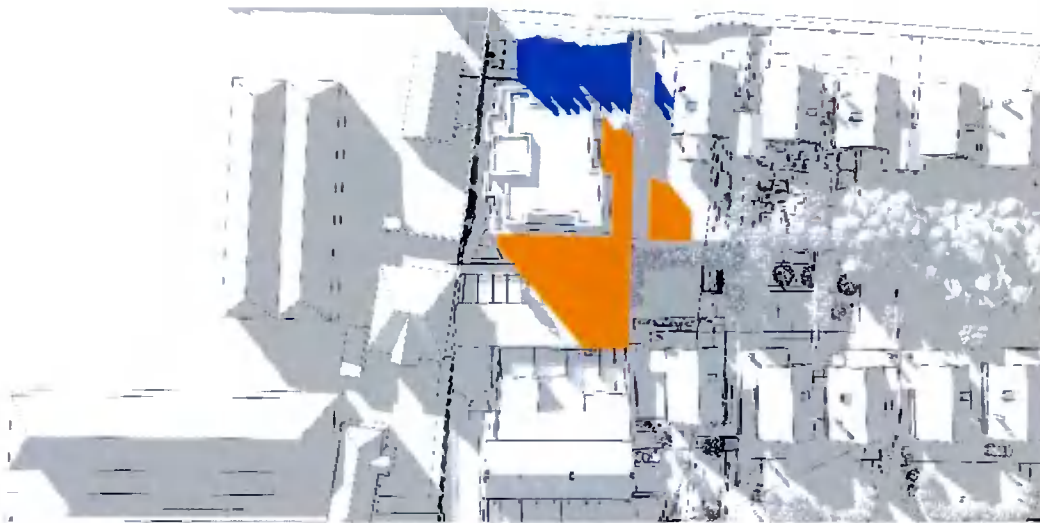


*Reference Image 3: highlighting Heights of Existing Map in the context of the Subject site*

**- MARCH:**

Note the improvement highlighted in **blue** between the existing site and the current proposal due to the removal of existing shrubbery and trees (this also improves the shadow casted by the trees to No. 21 Ardeevin Drive). Furthermore, the highlighted area in **orange** shows the shadow casted by the proposed development which indicates that shadowing occurs Predominantly within the development with only minor

shadow casting toward the back garden of No. 21 Ardeevin Drive (please see below reference image 4 of Heights Map in the context of the Subject site)



Reference Image 4: highlighting Heights of Proposed Map in the context of the Subject site

**- JUNE:**

Note the minor improvement highlighted in blue between the existing site and the current proposal due to the removal of existing shrubbery and. Also, the highlighted area in orange shows the shadow casted by the proposed development which indicates that minor shadowing occurs within the development with no shadow casting towards the existing adjacent developments (please see below reference image 5 of Heights Map in the context of the Subject site)



Reference Image 5: highlighting Heights of Proposed Map in the context of the Subject site

**- SEPTEMBER:**

Note the improvement highlighted in blue between the existing site and the current proposal due to the removal of existing shrubbery and trees. Additionally, the highlighted area in orange shows the shadow casted by the proposed development which indicates that shadowing only occurs on the existing car park of the Ball Alley which is within the proposal boundary thus no shadow casting occurs towards the existing



adjacent developments (please see below reference image 6 of Heights Map in the context of the Subject site)



*Reference Image 6: highlighting Heights of Proposed Map in the context of the Subject site*

**Further Information Request Item 5 –**

Whilst a Design Statement has been submitted with the application, it is noted that a more detailed Urban Design Statement setting out how the development proposal complies with the criteria set out in the 2020 Apartment Guidelines is required in accordance with SPPR 3. It is considered that the proposed development does not sufficiently comply with the criteria in the Building Height guidelines to grant permission, where the provision of the County Development Plan 2016-2022 with regard to building height indicates otherwise, and therefore additional information is requested to reduce the height of the proposal and to include a more detailed urban design statement.

**Response:** Please refer to updated design statement as prepared by CDP Architecture

**Further Information Request Item 6 –**

The applicant shall liaise directly with South Dublin County Council's Architectural Conservation Officer to discuss a revised proposed design that will address and mitigate the impact on, the Protected Structure. A written statement detailing the discussion to be submitted.

**Response:**

- Please refer to attached (Appendix A) response received from architectural conservation officer addressed to John Greene, Conservation Consultant, Grade 1 Conservation Architect.

**Further Information Request Item 7 –**

It appears that the development requires the removal of street trees in SDCC ownership. A Tree Survey, Arboricultural Impact Assessment and Tree Protection Plan have not been provided. The applicant is requested to submit and agree a comprehensive Tree Report with SDCC Public Realm Section. This shall comprise of a detailed



Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by a Professional Member of Arboricultural Association who is an independent, qualified Arborist and shall include all of the following:

- Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
- Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
- Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
- Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate
- Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
- Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs) of all trees and hedgerows to be clearly shown on this drawing.
- Arboricultural Method Statement: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.
- Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages. Provide a summary in table format of the trees to be lost as result of the proposed development and numbers of new trees to be planted as part of the landscape proposals in order to mitigate against this tree loss.

- **Response:**

Please refer to Arboricultural Impact Assessment and Tree Protection plan as prepared by The Tree File Consulting Arborists.

**Further Information Request Item 8 –**

The applicant has proposed to locate a watermain directly above a proposed underground surface water attenuation system. This is not acceptable as watermains must be a minimum setback distance of 3m from any surface water attenuation systems. The applicant is requested to submit a revised site services layout drawing showing that proposed watermains are a minimum of 3m away from proposed surface water attenuation systems.

**Response:**

Please refer to Revised Drawings and Document as prepared by Molony Millar Consulting;

**Further Information Request Item 9 –**

The applicant shall engage with Irish Water through the submission of a Pre-Connection Enquiry (PCE) in order to determine the feasibility of connection to the public wastewater infrastructure for both water and foul drainage. The Confirmation of Feasibility (COF) must be submitted to the planning department as the response to this further information request. Pre-connection enquiries can be made at <https://www.water.ie/connections/get-connected/>.

**Response:**

Please refer to Documents as prepared by Molony Millar Consulting;

**Further Information Request Item 10 –**

The applicant is requested to submit a drawing showing cross sectional details of all proposed SuDS (Sustainable Drainage Systems) features including Green roofs and Permeable Paving

**Response:**

Please refer to Revised Drawings as prepared by Molony Millar Consulting;

**Further Information Request Item 11 –**

The Planning Authority welcomes the green roof, permeable paving and SuDS tree pits in the drainage proposals. However, overall there is a lack of SuDS (Sustainable Drainage System) for the proposed development. The Public Realm Section consider that the proposed development is contrary to Policy IE2 Objective 5, Policy G5 -Sustainable Urban Drainage Systems and Objectives G5 1 in the County Development Plan. SDCC do not approve of using underground tanks as part of SuDS schemes where the full potential for the natural drainage features has not been explored. Further, natural SUDS features should be incorporated into the proposed drainage system. The applicant is requested to by way of additional information:

1. revisit the design and layout of the proposed development and demonstrate how the development will comply with these policies and objectives.
2. submit revised plans and particulars addressing item 1 and demonstrate how further natural SUDS features can be incorporated into the design of the proposed development. The SuDS shall be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022.
3. The applicant shall show further proposed SuDS features for the development such as SuDS tree pits in all new trees adjacent to hardstanding including replacement street trees, channel rills, swales, and other such SuDS and show what attenuation capacity is provided by such SuDS.
4. All SuDS should be incorporated into the landscape proposals.

5. Details to be provided and a SuDS strategy demonstrating how the SuDS features work, including for the SuDS 'planters'.

**Response:**

Please refer to Revised Drawings and Document as prepared by Molony Millar Consulting;

**Further Information Request Item 12 –**

The applicant/developer is requested to submit accurate plans demonstrating the provision of a visibility splay of 2.0m x 45m in both directions from the entrance. Sightlines should be shown to the near side edge of the road to the right-hand side of entrance and to the centreline of the road to the left-hand side of the entrance (when exiting).

**Response:**

Please refer to Revised Drawings as prepared by Molony Millar Consulting;

**Further Information Request Item 13 –**

The applicant is requested to submit the following as additional information:

- a) A layout showing the access road marked with cycling/pedestrian markings to indicate the shared surface designation of this road.

**Response:**

In regard to access road marked with cycling/pedestrian markings indicating the shared surface, please refer to access and parking layout plan as prepared by Molony Millar Consulting.

- b) A swept path analysis drawing (i.e. Autotrack or similar) demonstrating that fire tenders and large refuse vehicles can access/egress the site.

**Response:**

Please refer to drawings enclosed as prepared by Molony Millar Consulting demonstrating vehicle swept path analysis.

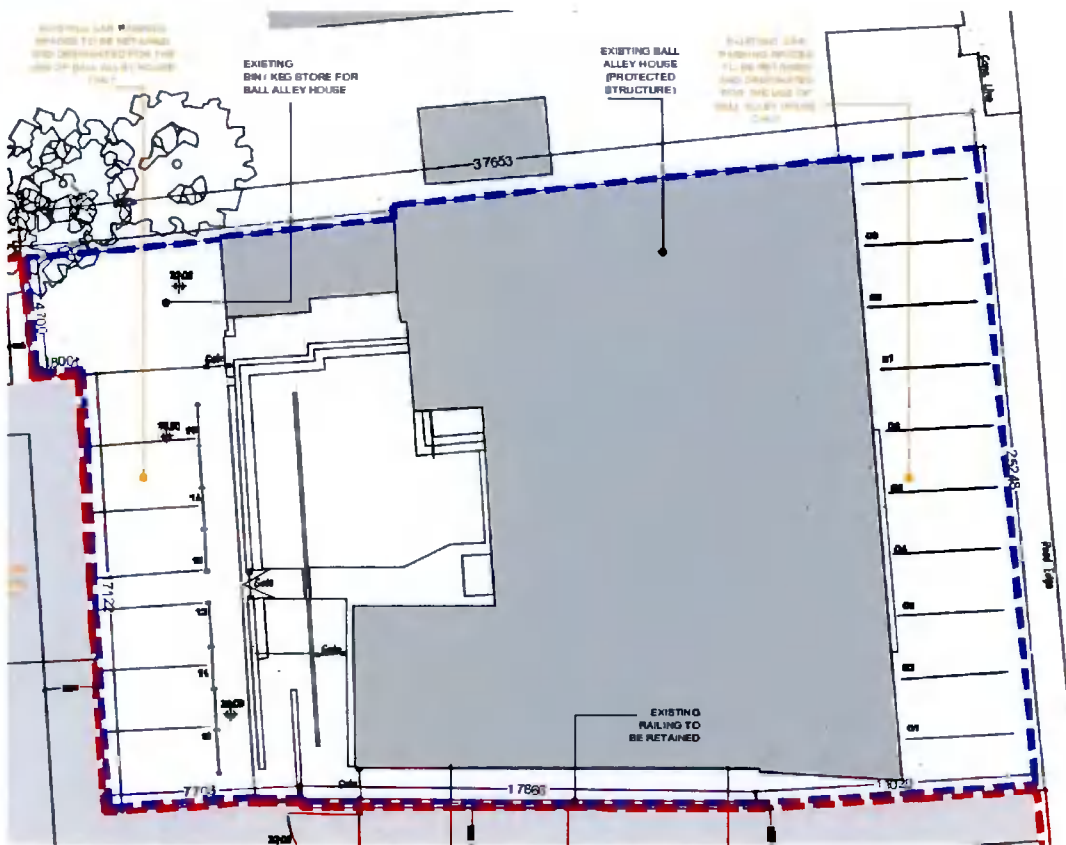
- c) Submit details on location and number of parking spaces to be provided at the development. Please refer to Table 11.23: Maximum Parking Rates (Non-Residential) - from the SDCC County Development Plan 2016-2022.
- Confirm the number of parking spaces to be retained with the pub and rationale for a reduction beyond the requirements of the CDP.

**Response:**

As per Table 11.23: Maximum Parking Rates (Non-Residential) - from the SDCC County Development Plan 2016-2022 states that 1 car parking spaces is required for 40sqm of Bar/Club in zone 2 our current proposal Retains 15 car parking spaces which are located to the front and back of

the Ball Alley House. And designated for the use of ball alley house only (please see below reference image 3, 4 and 5 which highlights the location of car parking spaces to be retained for the ball alley house).

Furthermore, given that the proposed development is easily accessible by a range of transport modes including cycling and walking, has sufficient good quality short stay car parking close to the core area, good transport linkages within the centre, and the majority of the regulars to the ball alley are locals who live within the Lucan town area, the number of car park provided for the proposed development is deemed to be sufficient.



Reference Image 7: proposed plans highlighting car parking to be retained for the ball alley





*Reference Image 8: existing car parking spaces to the front of Ball Alley House to be retained for the use of the Bar/Restaurant*

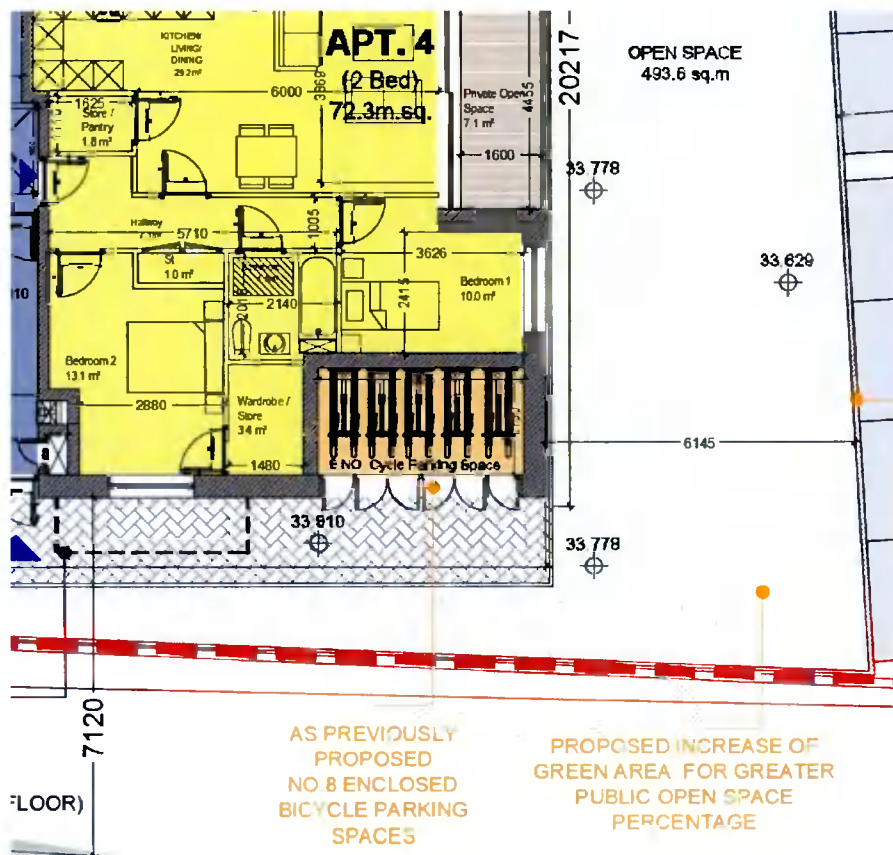


*Reference Image 9: existing car parking spaces to the back of Ball Alley House to be retained for the use of the Bar/Restaurant*

- d) A revised layout showing the car parking, bicycle parking and pedestrian routes within the development. Please refer to Table 11.22: Minimum Bicycle Parking Rates- SDCC County Development Plan 2016-2022.
- i. The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users.
  - ii. All external bicycle parking spaces shall be covered.
  - iii. Footpath layout shall provide adequate connectivity around the development and footpaths on the main road particularly Ardeevin Drive.

**Response:**

In terms of bicycle storage, Table 11.22: Minimum Bicycle Parking Rates- SDCC County Development Plan 2016-2022. States that 1 bike space per 5 apartments long term and 1 per 10 apartments short term is required. As per the initial application submitted to the council, 8 no bicycle parking spaces is proposed in an enclosed area within the proposed building (see attached reference image 6), given that the proposal is for No. 14 apartments the minimum requirement according to the table from SDCC County Development Plan is circa 5 bike spaces for the overall development thus the proposed 8 No. bike store is deemed to be sufficient.



Reference Image 10: proposed plans highlighting bicycle parking within the development

**Further Information Request Item 14 –**

The applicant is requested to submit the following as additional information:

1. The legend on the floor plans does not match the layout. The applicant shall provide an updated drawing to ensure legend is correct.

**Response:**

Please see enclosed Revised plans as prepared by CDP Architecture with updated legend

2. The applicant has provided contiguous elevations which is welcomed but they are requested to include exact heights of adjacent buildings for clarity, including the adjacent medical centre and apartment block, pub and residential buildings.

**Response:**

- Please see enclosed Revised drawing (3.1.303\_Rev A) contiguous elevations as prepared by CDP Architecture to include exact heights of adjacent buildings for clarity

**Conclusion:**

The Ball Alley Public House and site have been in the family for generations, going back to the 1940's. The family were also the previous owners of the lands adjacent and to the rear of the current Ball Alley Public House and sold the lands to the developer who constructed Ardeevin Drive.

Taking the accompanying information into consideration, along with the enclosed documents and information, on behalf of our client, we ask that South Dublin County Council grant permission for the above proposal. Please advise us in the event that there are any omissions or issues in relation to this Additional Information submission.

Yours Sincerely,



Paul Moran  
Director CDP Architecture