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Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

Monday, 20th September 2021

Dear Sir/Madam,

RE: PLANNING APPLICATION IN RELATION TO THE EXTENSION OF AN EXISTING DWELLING HOUSE AT GROUND FLOOR LEVEL AND THE CONSTRUCTION OF A BASEMENT LEVEL TO FACILITATE ANCILLARY RESIDENTIAL RECREATIONAL AND LEISURE AMENITIES AT A HOUSE AT SLADE, SAGGART, CO. DUBLIN

1.0 INTRODUCTION

1.1 Purpose of this Submission

Thornton O'Connor Town Planning in association with Kruger Lyons Architects¹ and Brunner Consulting Engineers² have been retained by Mr David Thompson³ to prepare a planning application in respect of a proposed extension to the existing dwelling at Slade Road, Saggart, Co. Dublin.

The proposed extension will facilitate a range of domestic scale recreational and leisure facilities to provide a high quality of living for the Thompson family. We submit that the now proposed scheme subject to this planning application has comprehensively addressed the concerns raised by South Dublin County Council in their assessment of the previously refused scheme and subsequent refusal (under SDCC Reg. Ref.: SD19A/0163) and will provide for a high-quality designed family home that successfully negates any impact on the surrounding landscape through the employment of an innovative design.

1.2 Summary of the Proposed Development

The development will principally comprise the excavation of a basement level (54 sq m) and the construction of an extension (151 sq m) to the eastern side of the existing house. The development will accommodate a home theatre at basement level and a domestic swimming pool, sauna and gym area at ground floor level. The works will increase the area of the dwelling from 373 to 578 sq m. The development will also include the insertion of 2 No. dormer windows at first floor level in

¹No. 303 Citywest Business Centre, 3013 Lake Drive, Citywest, Dublin 24

²IDA Business Park, Tiernaboul, Kilarney, Co. Kerry

³Slade Road, Saggart, Co. Dublin

lieu of 2 No. existing velux windows; internal reconfiguration of ground floor rooms to facilitate the internal connection to the side extension; elevational treatments; modification and replacement of first floor window on the south-west side elevation; upgrading the existing wastewater treatment system including provision of an Ecoflo polishing filter; hard and soft landscaping; changes in levels; and all other works above and below ground.

It should be noted that the Design Team now retained have implemented a number of fundamental changes to the scheme previously proposed at the subject site to address the concerns raised by South Dublin County Council in their assessment of Reg. Ref: SD19A/0163. The key changes are summarised below:

- The previously proposed ancillary building located to the west of the existing house has been omitted in lieu of a reduced scale side extension;
- The now proposed extension is located to the eastern side of the subject site further away from the public domain;
- The pool has been significantly reduced in scale from 115 sq m to 36 sq m;
- The extent of cut and fill required has been substantially reduced;
- A basement level (54 sq m) is now proposed in order to reduce the visual impact of the additional floor area; and
- Upgraded to the foul treatment system are proposed.

An extract from the previously proposed scheme is provided below for reference:

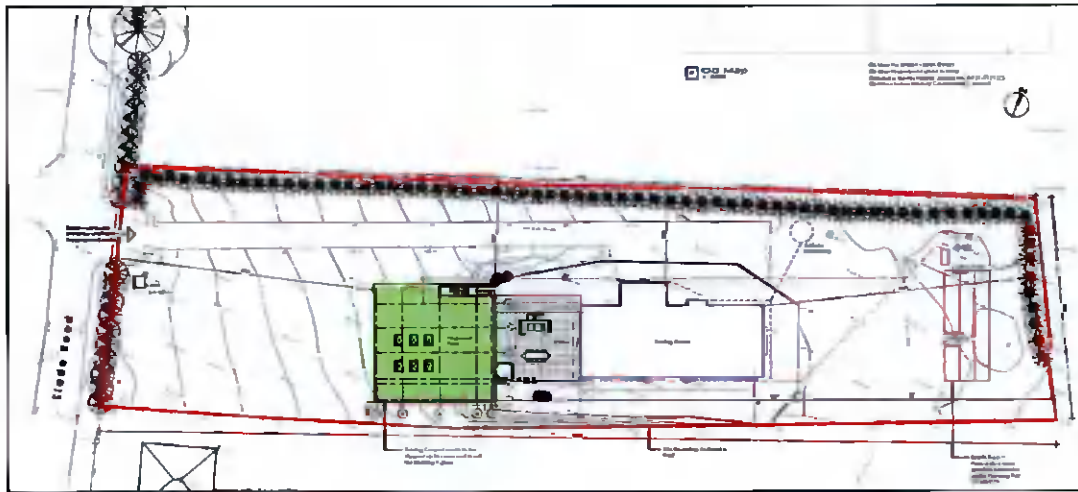


Figure 1.1: Previously Proposed Ancillary Building to the 'Front' of the Dwelling

Source: SDCC Online Planning File Reg. Ref. SD19A/0163.

The now proposed development will comprise of the construction a single storey ground floor extension (151 sq m) and a basement level (54 sq m) to the eastern site of the existing dwelling house. The proposed extension will accommodate recreational and leisure facilities at ground floor level comprising a family swimming pool, spa area, gym, and seating area. A home theatre will be provided at basement level.

An extract from the now proposed scheme is provide below for comparison:

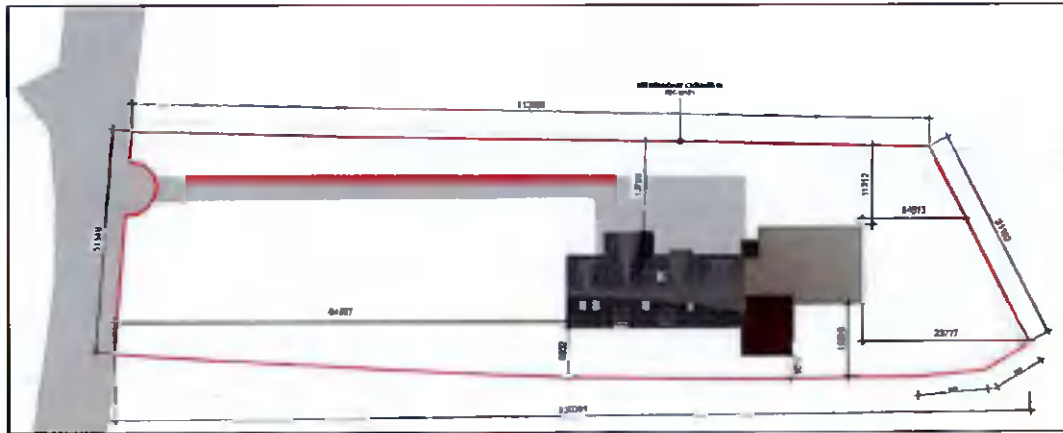


Figure 1.2: Now Proposed Site Layout (Drawing No. 103).

Source: Kruger Lyons Architects, 2021.

1.3 Addressing the Previous Reasons for Refusal

Permission was refused for the proposed single storey building on 8th July 2019 for 5 No. reasons. The South Dublin County Council decision to refuse permission was not subject to an Appeal by the Applicant but instead the decision was made to comprehensively change the development to address and respond to the Planning Authority’s concerns. The Design Team’s response to the 5 No. reasons for refusal are set out below:

Reason for Refusal No. 1

'Insufficient information has been submitted in relation to the backwash water that would be discharged after dichlorination via an attenuation tank to the domestic wastewater treatment system including failure to provide rates of discharge, control measures and location of the referenced attenuation tank onsite. In addition to the swimming pool, the proposal would incorporate additional new toilets (3 no. cubicles, 2 no. urinals and 4 no. wash hand basins). The applicant has not provided any supporting documentation on the existing wastewater treatment system or demonstrated that the proposal which would result in additional loading on the wastewater treatment system would comply with Code of Practice Wastewater Treatment Systems Serving Single Houses, EPA (2009) or other superseding standards. This is significant having regard to the deficiency in information provided, it is considered that the proposed development would contravene Council policy H27 Objective 1 of the South Dublin County Council Development Plan 2016-2022 and would be prejudicial to public health and constitute an unacceptable risk of water pollution.'

TOC Response:

Thornton O’Connor Town Planning refer to the Engineering Services Report prepared by Brunner Consulting Engineers which outlines that:

'Backwashing of the pool is carried out every 2 weeks by an automated process. The backwash discharge volume for the proposed pool is 585 litres. The contaminated backwashed water is dechlorinated and stored in an attenuation tank of 1000L capacity, to be discharged at a rate 0.5

litres per second to a soakaway. The soakaway has been sized to accommodate a 1 in 30 year storm event with 20% allowance for climate change and will provide additional capacity for the 585 litre backwash water.'

Swimming Pool Specifications are enclosed within the Engineering Services Report.

Reason for Refusal No. 2

'The proposal, involving significant and intrusive cutting of the sloping terrain to accommodate the proposed development (as demonstrated Drawing No.051) would introduce incongruous and visually intrusive form of development which would interfere with the rural setting and character of the landscape. Housing Policy H16 Steep or Varying Topography Site states 'It is the policy of the Council to ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.' And Policy H16 Objective 1 is 'To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography'. The proposed development would interfere with the rural landscape and character of the area and would materially contravene Policy H16 and Policy H16 Objective 1 and would therefore be contrary to the proper planning and development of the area.'

TOC Response:

The previously proposed ancillary building to the western side of the subject site has been omitted in lieu of an extension to the eastern side of the existing house thus mitigating the need to utilise substantial cut and fill mechanisms to construct the extension. Furthermore, we submit that the now proposed location of the development works will ensure that there is not a significant negative impact on the landscape. The natural sloping topography of the subject site will also diminish any direct views of the proposed above ground level extension from Slade Road.

Reason for Refusal No. 3

'The proposed development would contravene South Dublin County Council Development Plan 2016-2022 Policy H27 (Dwellings in Rural Areas) and Policy H27 Objective H27 Objective 1 as the proposal does not accord with the policy and policy objective in that:

- *The development is excessive in scale and would adversely impact on the character of the landscape;*
- *The development required intrusive engineered solutions and significant cutting into the sloping terrain;*
- *It is not demonstrated that the proposed development would comply with the Code of Practice Wastewater Treatment Systems Serving Single Houses, EPA (2009).*

In addition, the proposal would also interfere with the rural setting and character of the landscape. Within this context, the proposed development would further contravene the 'RU' zoning objective of the application site, which sets out to 'To protect and improve rural amenity and to provide for the development of agriculture' and would therefore be contrary to the proper planning and development of the area.'

TOC Response:

As previously outlined, the scale of the proposed development has been significantly reduced and is now relocated to a more suitable location. As such, the extensive cut and fill engineering measures previously proposed have been significantly reduced as the proposed development subject to this planning report aims to work with the natural topography of the subject site, as shown in Figure 1.3 below:



Figure 1.3: Elevation Drawing Showing Location of Development of the Previous Refusal at the Site Which Required Significant Amounts of Cut and Fill which is not Required as part of the Subject Application.

Source: Brunner Consulting Engineers, 2021.

Further information in respect of compliance with the *Code of Practice Wastewater Treatment Systems Serving Single Houses*, EPA (2009) has been set out in Section 4.0 of this planning report.

It should be noted that the now proposed development is an extension to an existing dwelling house and as such is not considered to be a contravention of the 'RU' zoning objective pertaining to the lands. The relevant planning policy objectives of the *South Dublin County Development Plan 2016-2022* are discussed in detail at Section 5.0 of the document and demonstrate the now proposed scheme is fully compliant with local policy objectives.

Reason for Refusal No. 4

'The proposed development is located in the Athgoe and Saggart Hills landscape area, which has been designated under the South Dublin County Council Development Plan 2016-2022 following a Landscape Character Assessment of South Dublin undertaken in 2015 as an area with a high landscape value and sensitivity and a Landscape Capacity which is negligible to low; meaning that the key characteristics of the landscape are highly vulnerable to development and that development would result in a significant change in landscape character and should be avoided if possible. Any increase in development in this area will have a negative impact on both the landscape value and sensitivity of this area, and would therefore materially contravene the South Dublin County Council Development Plan 2016-2022 Policy (HCL7) 'to preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity' and would be contrary to the proper planning and sustainable development of the area.'

TOC Response:

Our client understands the sensitivities associated with the landscape area in which the house is located and does not wish to detract from the Landscape Character Area. As such, the now proposed scheme has been significantly reduced in scale and relocated to the eastern side of the subject lands where limited views of extension will be visible from the public domain of Slade Road.

We submit that the proposed extension does not impact on the rural character of the area and has been appropriately designed having regard to the concerns raised by South Dublin County Council. A palette of high quality materials will also ensure that the domestic extension will assimilate into the receiving context.

Reason for Refusal No. 5

'The proposed development would set an undesirable precedent for other similar developments, which would in themselves and cumulatively, be harmful to the rural amenities of the area and would be contrary to the proper planning and sustainable development of the area.'

TOC Response:

We note that South Dublin County Council granted permission (under SDCC Reg. Ref. SD16B/0215) for a single storey extension at a neighbouring property on 29th August 2016 where it appropriately and successfully responded to the existing dwelling and site topography by continuing the building line ensuring the extension is not visible from Slade Road. Akin to that planning application, the design now put forward as part of this planning application endeavors to mitigate any potential impact on the delicate landscape through an innovative design that works with the existing site characteristics. The Design Team have carefully considered the concerns raised by South Dublin County Council in designing the now proposed scheme. The detailed design of the scheme is discussed at Section 4 of this report.

1.4 Appropriate Assessment Screening

The Application was screened for Appropriate Assessment.

The subject site is located at a distance of circa 5 kilometres to the *Glenasmole Valley SAC*, to the south-east, circa 6 kilometers to the *Wicklow Mountains SAC*, to the south-east, and circa kilometres to *Wicklow Mountains SPA* to the south-east.

Having regard to the nature and extent of the development (domestic extension) and its location on Slade Road, Saggart, it is considered that no adverse environmental impacts will arise to the nearest Natura 2000 sites.

Thus, it is considered that no Appropriate Assessment is required for this proposal.

2.0 SITE LOCATION AND CONTEXT

2.1 Site Location

The subject site, which measures approximately 0.4064 Ha (4,064 sq m) is located off Castle Road to the south of Saggart village. The rectangular shaped site is located on Slade Road and comprises a detached two storey dwelling house with a large garden.



Figure 2.1: Site Location Map with Boundary Outlined in Red.

Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2021.

2.2 Site Context

The subject lands are located in the rural edge of Saggart village which consists primarily of linear development comprising dwelling houses of various scales. The subject lands are bound to the north and south by houses with frontage onto Slade Road and agricultural lands, to the west by Slade Road, and to the east by agricultural lands. Images of the surrounding residential context are provided below.



Figure 2.2: Existing Access to the Subject Site from Slade Road.

Source: Google Maps.

3.0 PLANNING HISTORY

3.1 Subject Site

A search of South Dublin County Council's online planning database found that there has been 2 No. recent planning application on the subject site.

3.1.1 Attic Conversion

Reg. Ref.:	SD16B/0201
Description of Development:	Retention permission for first floor accommodation in attic space as granted permission and constructed under Reg. Ref. S95A/0186, associated alterations to all elevations, vehicular entrance location and all associated site works. Permission is sought for 2 No. front extensions to dormer dwelling, alterations to all elevations, foul water to existing on site treatment system and surface water to soakaways and all associated site works.
Decision:	Grant Permission
Decision Date:	3 rd June 2016

South Dublin County Council granted permission for the retention application on 3rd June 2016 subject to 5 No. conditions.

3.1.2 Previously Refused Ancillary Building

Reg. Ref.:	SD19A/0161
Description of Development:	Private indoor swimming pool and ancillary accommodation in a separate single storey building adjacent to house, all associated and ancillary ground and site works.
Decision:	Refuse Permission
Decision Date:	8 th July 2019

The Planning Officer in the assessment of the scheme was of the opinion that:

'Residential development that accords with Council policy for development in rural areas is listed as open for consideration under the 'RU' zoning objective of the application site. Therefore, such proposals may be permitted only if they do not conflict with policies and objectives of the Development Plan and if they are consistent with the principles of proper planning and sustainable development and relevant Ministerial guidelines.'

In the assessment of the refused scheme the Planning Officer acknowledged that:

'The topography of the site sloped downwards in a west to east direction.'

We highlight that the previously proposed standalone development was situated to the west of the existing dwelling, the now proposed extension is located to the east of the existing dwelling in order to work with the natural slope of the site and to circumvent the need for intrusive engineered solutions.

The Planning Officer in this case continues:

'Any increase in development in this area will have a negative impact on both the landscape value and sensitivity of this area, and would therefore be contrary to Policy (HCL7) 'to preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity', would be contrary to HCL7 Objective 1 and Objective 2 and would be contrary to the proper planning and sustainable development of the area.'

However, Objective HCL7 continues:

'to ensure that landscape considerations are an important factor in the management of development.'

As detailed further below, we note that a similar single storey extension to the rear of an adjacent property received planning permission (SD16B/0215), which is located 80 metres to the north and similarities between the two designs are evident. The nearby planning application placed the extension to the rear of the existing dwelling, removing visibility from the public domain on Slade Road, and sought to integrate the extension into the landscape more so than maximise site coverage. The amended proposal as part of this application seeks to replicate the core principles evident in the nearby planning application and to work with existing site characteristics, placing landscape considerations at the forefront and addressing relevant concerns of the Planning Officer.

Previous reasons for refusal at the subject site have been addressed in Section 1.3 of this report. The Planning Officer in their assessment of the previous scheme at the subject site was of the opinion that:

'...it is considered that the proposed development is excessive in scale, massing and layout, for a private pool that would be ancillary to the existing house, by virtue of the fact that it has multiple changing rooms, separate male and female toilets, with multiple cubicles.

'the proposed pool building measuring 223 sq m in size would not be subservient to the existing dwelling onsite as demonstrated in the Site Plan (Drawing No. 050). Furthermore, it is a separate building and there is no direct internal link between the house and the proposed swimming pool. The building would be larger in floorplate than some of the existing dwellings in the vicinity of the site.'

In regard to the extent of cut and fill mechanisms that would be required the Planning Officer raised concerns noting that the development:

'... would not accord with Policy H1 Objective 1 which is 'to avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography'.

In summary the Planning Officer outlined that:

'The applicant has failed to demonstrate that the proposed development would accord with Policy H27 Objective 1 in that –

- *It is excessive in scale and would adversely impact on the landscape;*

- It requires intrusive engineered solutions and significant cutting into the sloping terrain;
- It is not demonstrated that the proposed development would comply with the Code of Practice Wastewater Treatment Systems Serving Single Houses, EPA (2009).

Having regard to the above, it is considered that the propose (sic) development would not accord with the policy zoning RU, would contrive Council Policy H16 Objective 1 and Policy H27 Objective 1, and may be prejudicial to public health.'

'This area of Slade valley is important in terms of landscape and habitat variety and has a medium/high landscape character sensitivity level as outlined in the Landscape Character Assessment. It is Council policy to protect and preserve significant views from the Blessington Road (N81 national secondary road) in a northwest direction across the Slade Valley which encompasses the subject site.

As detailed in Section 1.3 of this report, the subject scheme has sought to comprehensively respond to all of the concerns of the Planning Authority in respect of the previous application at the lands.

3.2 Vicinity of the Subject Site

There have been a number of planning applications pertaining to surrounding neighbouring properties in recent years that are considered to be of relevance and are identified on the aerial photograph below:



Figure 3.1: Location of Nearby Planning Applications.

Source: Google Maps, 2021.

3.2.1 Domestic Extension at Slade Road, Saggart, Co. Dublin

Reg. Ref.	SD16B/0215
Location	Slade Road, Saggart, Co. Dublin
Applicant	Michael Hughes
Description	Single storey domestic extension to rear of existing bungalow and internal alterations. The extension works comprise of 70 sq m to include new kitchen/dining area and extended bedroom & ensuite.
Decision	Grant Permission
Decision Date	29 th August 2016

The Planning Officer in their assessment of the scheme acknowledged that:

'The extended site boundaries of the site, which are located to the rear of the existing dwelling (east) shall be planted with semi-mature / mature trees and hedging plants within the first planting season following the commencement of development of the extension.'

The application was granted permission subject to 10 No. conditions on the 29th of August 2019.

3.2.2 Retention Permission of Porch at a site to the North of the Subject Site

Reg. Ref.	SD19B/0267
Location	St Rita's Slade, Saggart, Co. Dublin, D24 HE09
Applicant	Executors of the estate of Ann McDermott
Description	Front single storey porch to existing single storey house and all associated site development works.
Decision	Grant Permission
Decision Date	2 nd September 2019

On the 2nd of September 2019, South Dublin County Council granted retention permission for the single storey porch subject to 2 No. conditions.

3.2.4 Domestic Extension at Slade Road, Saggart, Co. Dublin

Reg. Ref.:	SD21B/0236
Address:	Tír na nóg, Slade Road, Saggart, Co. Dublin
Applicant:	Mícheál ó hAodha
Description of Development:	Single storey extension to side of existing bungalow and internal alterations comprising of 91 sq m to include new sitting room, bathroom and bedroom with en-suite.
Decision:	Grant Permission
Decision Date:	17 th June 2021

The Planning Officer in assessing the scheme at 'Tír na nóg' noted that:

'...there are protected views from the N81 (Blessington Road) looking to the north-west towards the subject site. The existing site benefits from the planted boundaries (along the northern, eastern and southern boundaries) which screen the structure from the road and the surrounding area and will aid in the mitigation of any potential visual impact.'

The Planning Officer concluded that:

'It is considered that the proposed extension is visually acceptable and would not negatively impact on the Slade Valley'.

Planning Permission was granted on the 17th June 2021 subject to 4 No. conditions.

3.3 Planning History Analysis

From a review of the planning history of the surrounding area, it is evident that South Dublin County Council have permitted appropriate development in the existing built-up area of Slade Road. It is of utmost importance that additions to existing dwelling houses do not result in a negative impact of the landscape and where mitigation measures have been successfully employed, permission has been granted such as the single storey extension (under SDCC Reg. Ref. SD16B/0215) and more recently the single storey porch (under SDCC Reg. Ref. SD19B/0267). It is our professional planning opinion that the extension to the existing dwelling house subject to this application would not result in an undesirable precedence but rather be coherent with extensions to dwelling houses in the vicinity of the subject site permitted to date by South Dublin County Council.

4.0 PROPOSED DEVELOPMENT IN DETAIL

4.1 Details of the Proposed Development

The development will principally comprise the excavation of a basement level (54 sq m) and the construction of an extension (151 sq m) to the eastern side of the existing house. The development will accommodate a home theatre at basement level and a domestic swimming pool, sauna and gym area at ground floor level. The works will increase the area of the dwelling from 373 to 578 sq m.

The development will also include the insertion of 2 No. dormer windows at first floor level in lieu of 2 No. existing velux windows; internal reconfiguration of ground floor rooms to facilitate the internal connection to the side extension; elevational treatments; modification and replacement of first floor window on the south-west side elevation; upgrading the existing wastewater treatment system including provision of an Ecoflo polishing filter; hard and soft landscaping; changes in levels; and all other works above and below ground.

4.2 Key Site Statistics

The following key site areas pertain to the subject application:

Site Area	4,064 sq m
Existing GFA	373 sq m
Area of Demolition	0 sq m
Proposed New Floor Area to Dwelling House	205 sq m
Proposed GFA of Dwelling House	578 sq m

4.3 Proposed Development

The proposed development comprises construction works at basement and ground floor level as detailed below:

Basement Floor Level

The proposed development will provide a basement level (54 sq m) to the south-east of the existing house. The proposed basement will be accessed via a staircore connecting to the ground floor side extension. The proposed basement extension will accommodate a home family theater. An extract from the proposed floor plans is provided below:

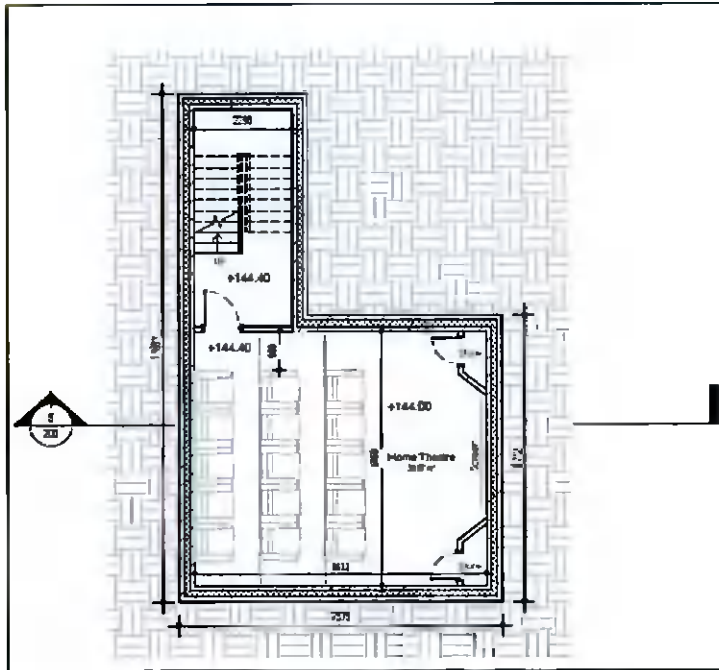


Figure 4.2: Proposed Basement Floor Plan (Drawing No. 103).

Source: Kruger Lyons Architects, 2021.

Ground Floor Level

An extract from the proposed ground floor plan is provided below which illustrates that the proposed extension to the east of the existing house will accommodate recreational and leisure facilities for the Thomson family that will positively contribute to the overall quality of living spaces provided for within their home. The extension will contain a small swimming pool, seating area, gym and shower room totaling 151 sq m. The proposed living spaces at this level will have a strong relationship with the garden by providing direct access to a patio area. The proposed works at this level also include internal reconfigurations to accommodate a seamless integration with the existing house.

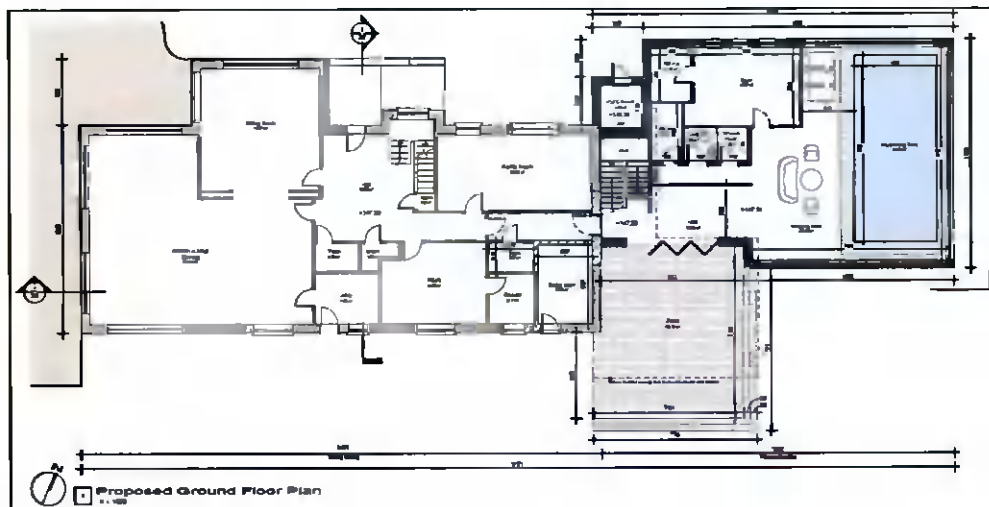


Figure 4.3: Proposed Ground Floor Plans (Drawing No. 103).

Source: Kruger Lyons Architects, 2021.

First Floor Level

The development will also include the insertion of 2 No. dormer windows at first floor level in lieu of 2 No. existing velux windows. The proposed dormer windows will provide increased head heights serving 2 No. upstairs bedrooms and will ultimately contribute to a greater quality of living space for the Thompson family.

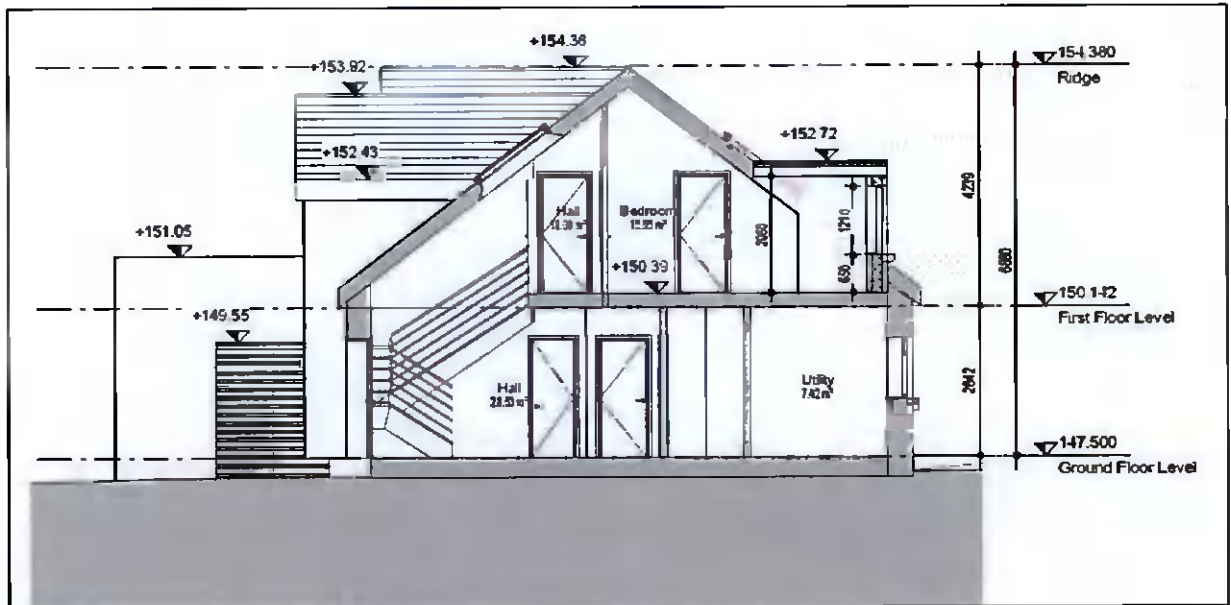


Figure 4.4: Proposed Sections (Drawing No. 200).

Source: Kruger Lyons Architects, 2021.

4.4 Height, Scale and Massing

The proposed extension comprises a single storey above ground level with a flat roof thus the proposed extension will not result in an increase in overall height of the structure. Extracts from the proposed front and rear elevations are provided below for reference:



Figure 4.5: Proposed Front and Rear Elevations (Drawing No. 200).

Source: Kruger Lyons Architects, 2021.

The proposed extension is subservient in nature to the existing dwelling house and will not detract from its existing character. We submit that the proposed single storey extension has been appropriately scaled and sited having regard to the site context and sloping topography of the subject lands. It should also be noted that the proposed extension will be substantially screened from Slade Road by the existing massing of the house. An extract from the south-west elevation is provided below and demonstrates that the scale of the now proposed extension, in addition to the proposed dormer windows, is in keeping with the character and scale of the existing house.



Figure 4.6: Proposed South West Elevation (Drawing No. 200).

Source: Kruger Lyons Architects, 2021.

The proposed sections also demonstrate that the scale and massing of the proposed extension is appropriately placed.



Figure 4-7: Proposed Sections (Drawing No. 200).

Source: Kruger Lyons Architects, 2021.

It is our professional planning opinion that the height, scale, and massing of the proposed extension has been designed to ensure that the integrity of the existing building is protected and avoids a monotonous and pastiche approach.

4-5 Private Open Space

The proposed development will retain the large garden to the west of the existing dwelling in addition to ground floor patio (58 sq m).

4-6 Engineering Details

An Engineering Planning Report has been prepared by Brunner Consulting Engineers and is enclosed with this planning application. The Engineering Planning Report outlines the following with regard to the proposed domestic swimming pool:

'The site is currently serviced from a private well with a water treatment and filtration system. This will service the swimming pool as described in Appendix A. The pool is filled once from the well and remains full through its lifetime. The pool volume is 43.2m³, which is changed every 3 years by progressive dilution through backwashing.'

'Backwashing of the pool is carried out every 2 weeks by an automated process. The backwash discharge volume for the proposed pool is 585 litres. The contaminated backwashed water is dechlorinated and stored in an attenuation tank of 1000L capacity, to be discharged at a rate 0.5 litres per second to a soakaway. The soakaway has been sized to accommodate a 1 in 30 year storm event with 20% allowance for climate change and will provide additional capacity for the 585 litre backwash water.'

In relation to SuDS features at the subject site the report confirms that:

'South Dublin City Council (SDCC) guidelines for the design of surface water require the incorporation of Sustainable Drainage Systems as per the Greater Dublin Strategic Drainage Study. This is good practice and we propose to use as many sustainable urban drainage systems (SUDS) as possible and recharge any precipitation to ground through permeable surface finishes or soakaway.'

1. *Rainwater from roof of extension to be discharged to attenuation trench sized for a 60minute, 1 in 30 year return storm + 20% for climate change. Rainfall data has been used from Met Eireann records.*
2. *Proposed hard standings to receive fully permeable surfaces to allow direct percolation of rainfall to ground.'*

The Engineering Report also provides an overview of the proposed foul water drainage system:

'There is no increase in the population of the property as a result of the development. The existing treatment plant is being replaced with a designed Treatment Plant, Coconut Filter and percolation area to facilitate offsets from the proposed extension.'

'Please refer to Site Assessors report (enclosed) for details on the Waste Water Treatment Plant and associated works. The foul water drainage layout is indicated on Brunner's Engineering drawing T23-P-001.'

4-7 Wastewater Treatment System Details

The proposed development will comply with the *Code of Practice Wastewater Treatment Systems Serving Single Houses, EPA (2009)* through upgrading the existing wastewater treatment system. The following site assessor reports are enclosed with this planning application:

1. Soil Infiltration Test prepared by Dr. Eugene Bolton of Trinity Green Environmental Consultants which concludes that the soakage is reasonable and with the watertable at 1.5m bgl the site should be suitable for a soakaway.
2. Site Characterisation Report prepared by Dr. Eugene Bolton of Trinity Green Environmental Consultants which recommends upgrading the existing BAF P8 to a BAF P12, Polish the effluent in a Coconut filter and discharge the polished effluent to the existing percolation area - which has been installed in accordance with the planning under which it was granted' (SDCC Reg. Ref.: SD16B/0201). **A Pressurised Percolation Completion Report prepared by Mitchell Environmental is also appended and it details the supply and installation of a new Pressurised Percolation network at the subject site which received permission in accordance with Reg. Ref. SD16B/0201 which has been implemented at the site.**
3. Assessment of Soil Test Report and Quotation for an Oakstown BAF 12 PE Wastewater Treatment System prepared by O'Reilly Oakstown Environmental which confirms the suitability of their Oakstown BAF 12 PE Wastewater Treatment System to treat effluent being discharged from the above proposed dwelling.
4. Treatment Performance Results carried out by PIA (Prüfinstitut für Abwassertechnik) concluding that the subject site received a pass result.
5. An O'Reilly Oakstown Environmental Maintenance Contract to provide for the annual inspection and servicing of the proposed wastewater treatment system

5.0 COMPLIANCE WITH PLANNING POLICY – SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN 2016 -2022

5.1 Zoning – ‘Objective RU’

The subject site is zoned ‘Objective RU’ in the *South Dublin County Council Development Plan 2016 -2022*, where the stated objective is ‘to protect and improve rural amenity and to provide for the development of agriculture.’

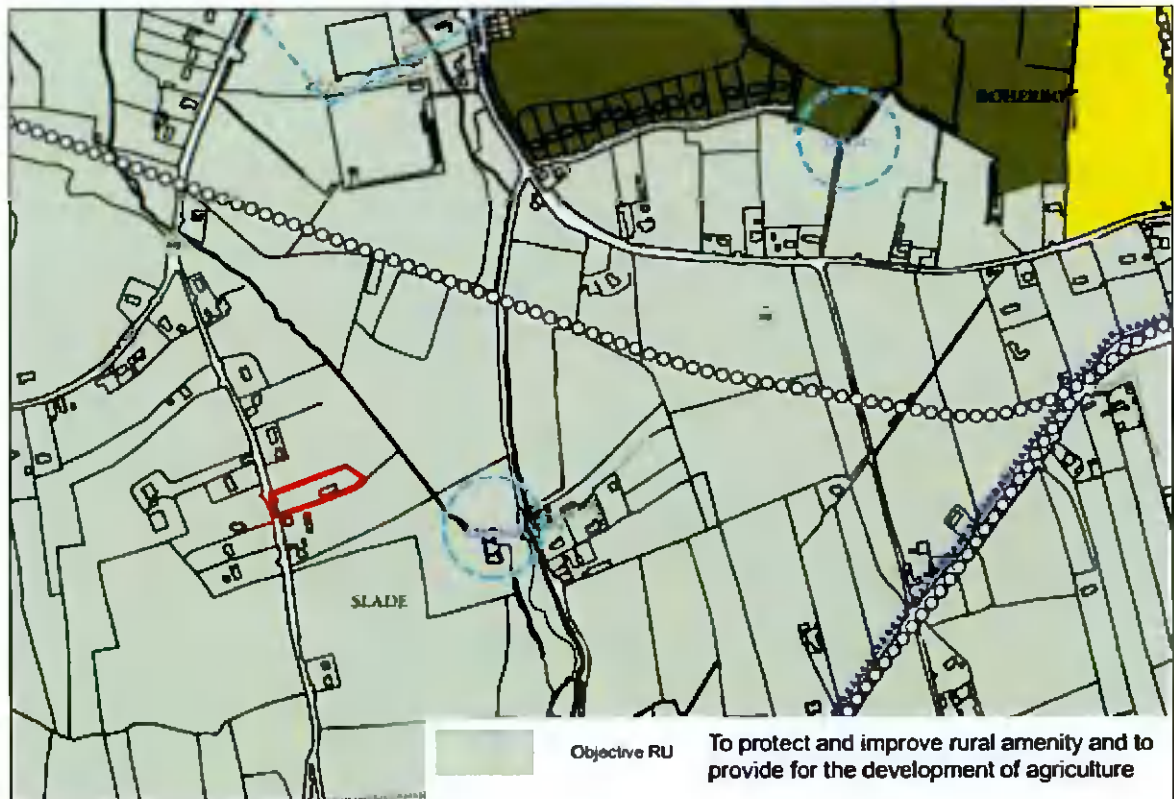


Figure 5.1: Map Showing the Zoning of the Subject Site (Indicative Site Boundary outlined in Red).

Source: *South Dublin County Council Development Plan 2016 -2022*, annotated by Thornton O’Connor Town Planning, 2021.

TOC Comment:
Residential Development is ‘open for consideration’ under the zoning objective pertaining to the lands.

5.2 Principal of Development on Steep or Varying Topography Sites

Policy H16 (Steep or Varying Topography Sites) of the *South Dublin County Council Development Plan 2016 - 2022* states that it is Council policy:

‘To ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.’

Furthermore, Objective 1 aims:

'To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).'

TOC Comment:

Having regard to the site characteristics, the proposed single storey extension is suitable designed and successfully integrated with its physical surroundings. It is our opinion that the proposed works will vastly improve the residential amenity for the occupiers of the property all the while minimising the visual impact on the area.

5.3 Dwellings in Rural Areas

In respect of residential development in rural and high amenity areas, Policy H27 of the *South Dublin County Council Development Plan 2016 – 2021* provides the following guidance.

Extensions:

The *Development Plan* requires that extensions are to be assessed based on a number of factors, to:

'Ensure that all new rural housing and extensions within areas designated with Zoning Objective 'RU':

- *'Is designed and sited to minimise impact on the landscape including views and prospects of natural beauty or interest or on the amenities of places and features of natural beauty or interest including natural and built heritage features.'*
- *'Is designed and sited to circumvent the need for intrusive engineered solutions such as cut and filled platforms, embankments or retaining walls.'*
- *'Would comply with Code of Practice Wastewater Treatment Systems Serving Single Houses, EPA (2009) or other superseding standards.'*

TOC Comment:

As shown in the proposed elevation, the proposed single storey extension over ground level is appropriately scaled and sited in the sloping topography of the site. We submit that the proposed extension is largely screened from Slade Road and will assimilate into the surrounding landscape context. It is noted that the proposed extension will have a flat roof which will further reduce any perceived impacts of the extension. The proposed extension contributes to the architectural composition of the dwelling house by providing balanced interest between the existing and contemporary features. The site is surrounded by trees and hedgerows and the exterior of the dwelling is proposed to be finished in a palette of high-quality materials that reflect the character of the surrounding area.

In relation to cut and filled platforms, the proposed extension takes advantage of the natural characteristics of the site and minimises the need for cut and fill. The proposed extension has been designed to respond to, and compliment the site's natural contours, ensuring the dwelling fits into the site naturally. The proposal retains the natural boundaries avoiding the need for intrusive engineered solutions.

In relation to wastewater, we refer to the Engineering Planning Report prepared by Brunner Consulting Engineers which states that:

'There is no increase in the population of the property as a result of the development. The waste water treatment plant as installed and certified remains for the treatment of foul effluent from the property without increase in discharge volumes.'

The Engineering Services Planning Report is enclosed as a standalone document and enclosed with this planning application.

5.3.1 Rural Housing Design

Section 11.3.4 of the *South Dublin County Council Development Plan 2016 - 2022* states that it is Council policy to:

'A comprehensive site analysis and character appraisal should be submitted with all applications for houses and extensions in rural and high amenity zones (see also Section 11.5.5 (i) Ecological Protection and (ii) High Amenity and Sensitive Landscapes). The analysis and appraisal should provide a rationale for the design and siting of the proposed development including form, building finishes, height, and massing based on the local and natural context. Such development should generally be low rise. The shape and form of residential development in rural and high amenity areas, including roof structures, should be compact and simple with external building finishes that reflect the local character of the area including vernacular buildings and traditional building materials.'

TOC Comment:

An Architectural Design Statement prepared by Kruger Lyons Architecture has been enclosed with this planning application. The Design Statement examines local context and states:

'The neighbouring and surrounding houses in the area are mostly 1 to 3 storeys with sloping roof and dormer windows. The materials used for roofing are slate or shingles. The external building materials used are stone, render finish and wood.'

The Design Statement highlights that the form of the proposed extension is *'derived from the existing house form.'*

The single storey flat roof extension has been designed so that:

'The height and the massing are in context with the surrounding rural residential settings and in relation to the existing house.'

The Design team have carefully considered materials for the proposed extension and have chosen to use minimal materials that comply with the rural context:

'The materials used are dark stone, off-white paint, timber and dark roofing shingles for the roof.'

Please see the Architectural Design Statement which has been enclosed with this planning application.

5-4 Preserving and Enhancing the Character of the County's Landscapes

Policy HCL7 (Heritage, Conservation and Landscapes) of the *South Dublin County Council Development Plan 2016 - 2022* states that it is Council policy to:

'Preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development.'

Furthermore, Objective 2 aims:

'To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2015) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy.'

TOC Comment:

The subject site is located in the Athgoe and Saggart Hills landscape area. The area has a high landscape value and sensitivity and a Landscape Capacity which is negligible to low; meaning that the key characteristics of the landscape are highly vulnerable to development and that development would result in a significant change in landscape character and should be avoided if possible.

The extension to the existing dwelling has been suitably designed having regard for the site characteristics. The proposed extension has been designed to follow the existing building line where possible and appears visually congruous in the landscape.

The proposed extension respects the landscape values of 'extensive views' outlined in the Landscape Character Area and addresses the forces of change including 'Declining Hedgerows' by retaining existing trees and hedgerows on site, with the extension in keeping with the 'vernacular townscape character' present across the Landscape Character Area.



Figure 5.2: Athgoe and Saggart Hills Landscape Character Area

Source: Landscape Character Assessment of South Dublin, 2015.

It is our opinion that the proposed works will vastly improve the residential amenity for the Thompson family and will respect the delicate nature of the site and surrounding environs.

9.0 PLANNING ADMINISTRATION

9.1 Planning Fee

- An cheque addressed to South Dublin County Council in the amount of €34 representing the planning application fee, in accordance with the provisions of Schedule 9 of the *Planning and Development Regulations, 2021* is enclosed with this application.

9.2 Statutory Notices

- An original page of the Irish Daily Star published on 17th September 2021, in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2021*.
- One copy of the Site Notice dated 17th September 2021 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations, 2021*.

9.3 Planning Application Form

- A completed *South Dublin County Council Planning Application Form*, dated 17th September 2021

9.4 Planning Report

- Six copies of this *Planning Report*, prepared by Thornton O'Connor Town Planning, dated September 2021.

9.5 Architecture

- Six copies of the *Architectural Design Statement* prepared by Kruger Lyons Architects, dated August 2021.
- Six copies of the following drawings prepared by Kruger Lyons Architects:

Kruger Lyons Architecture			
Drawing No.	Drawing Title	Scale	Size
100	Site Location Map & General Site Plan	As Indicated	A1
101	Existing & Demolition Floor Plans	1:100	A1
102	Existing/ Demolition Elevations	1:100	A2
103	Proposed Ground, Basement & First Floor Plans	As Indicated	A1
104	Proposed Roof Plan & 3D Views	1:100	A1
200	Proposed Elevations & Section	1:100	A1
201	Contiguous Elevations & 3D Views	1:200	A1

9.6 Engineering

- Six copies of the Engineering Services Planning Report and Site Layout Plan and Drainage Details drawing prepared by Brunner Consulting Engineers, September 2021.

9.8 Site Assessor Reports

- Six copies of the following reports.

Site Assessor Reports	
Report Title	Prepared by:
Soil Infiltration Test for Design of Soakaway	Dr. Eugene Bolton
Site Characterisation Report	Dr. Eugene Bolton
Treatment Performance Results	PIA (Prüfinstitut für Abwassertechnik)
Assessment of Soil Test Report and Quotation for an Oakstown BAF 12 PE Wastewater Treatment System prepared	O'Reilly Oakstown Environmental
O'Reilly Oakstown Environmental Maintenance Contract	O'Reilly Oakstown Environmental

10.0 CONCLUSION

We submit that the proposed works subject to this application will create a high quality and sustainable dwelling house that caters for the residential amenity needs of our Client and comprehensively addresses the previous reasons for refusal (SDCC Reg. Ref. SD19A/0163). The focus throughout the design of the proposed extension has been on minimising and negating the impact of the extension on the character of the surrounding area in accordance with the policy and guidance set out in *the South Dublin County Council Development Plan 2016-2022* as discussed at Section 5.0. As such, it is considered that the proposed development represents the proper planning and sustainable development of the area.

We trust you will find this application in order. Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Yours Sincerely,



Sadhbh O'Connor
Director
Thornton O'Connor Town Planning