



**ARMSTRONG
FENTON**
ASSOCIATES

PROJECT: "Gordon Park", Kingswood, Dublin 22.

PLANNING REPORT: for proposed
residential development at "Gordon
Park", Kingswood, Dublin 22

CLIENT: Greenwalk Development Ltd

DATE: 29 | 11 | 2021

**Planning &
Development
Consultants**



1.0 Introduction

1.1 This report has been prepared by Armstrong Fenton Associates, Planning Consultants, on behalf of our client Greenwalk Development Ltd, who is seeking planning permission for the construction of a residential development on a site area of 2.28 hectares (5.6 acres), at a site known as Gordon Park in Kingswood, Dublin 22. The application site comprises the rugby pitches at Clondalkin Rugby Football Club (RFC) at Kingswood.

1.2 The permission being sought, and as per the public notices, is as follows:

Greenwalk Development Ltd seeks permission for a residential development on a site area of 2.28Ha, at Gordon Park, Old Naas Road, Kingswood, Dublin 22. The proposed development site is bounded to the west by the Old Naas Road, to the south by the Silken Park development, and is located in the townland of Brownsbarn.

The proposed development consists of 77 no. dwellings, comprised of 63 no. 2 storey houses, and 14 no. apartments & duplex units accommodated in 1 no. 3 storey building. The proposed houses are comprised of 8 no. 2 bed houses & 55 no. 3 bed houses. The proposed apartments & duplex units are comprised of 7 no. 1 bed apartments at ground floor & 7 no. 3 bed duplex units overhead. The proposed development also provides for all associated site development & infrastructural works, car & bicycle parking, open spaces, hard & soft landscaping, boundary treatments, bin & bicycle storage. Access to the development will be via a new vehicular entrance at the south-west corner of the site, off the Old Naas Road. Permission is also sought to demolish the existing building on site, approx. 455m².

1.3 Design Team

This planning application has been prepared by a qualified design team with vast experience in residential development. The design team for the proposed development includes:

Conroy Crowe Kelly	Architects
Armstrong Fenton Associates	Planning Consultants
TJ O'Connor Consulting Engineers	Drainage and Water Services, Internal Roads
Pinnacle Consulting Engineers	Traffic & Transport Assessment
Cunnane Stratton Reynolds Landscape Architects	Landscaping Proposals
Griffin Landscape Architecture & Linnane Arboriculture Ltd	Tree & Hedgerow Survey
Enviroguide	Ecology / Appropriate Assessment Screening
Redmond Analytical Management Services	Public Lighting
Morley Walsh	EV Charging
AWN Consulting	Project Construction & Waste Demolition Plan & Noise Assessment



2.0 Site Location & Description

2.1 The lands subject to this application are located in the townland of Brownsbarn. The site is occupied by rugby playing pitches and associated clubroom/changing facilities associated with the Clondalkin Rugby Club (RFC). The site is subject to two land use zoning objectives; the north-western part of the site is zoned Objective LC: *To protect, improve and provide for the future development of Local Centres*, while the remainder, and majority, of the site is zoned Objective RES: *To protect and/or improve residential amenity* in the South Dublin County Development Plan 2016-2022.

2.2 The proposed development site, known as “Gordon Park” is located on the Old Naas Road, Kingswood, Dublin 22, and is home to the Clondalkin RFC. To the south of the site is the Silken Park residential development, to the north and east are other sporting facilities while the Old Naas Road abuts the site along its western boundary. The N7 / Naas Road and Kingswood Interchange are to the north of the site.

2.3 The environs are comprised of a mix of uses, including residential to the immediate south at Silken Park and to the west at Brownsbarn Wood. To the north-west are a variety of commercial uses including an architectural salvage yard, vehicle testing centre, car sales and hotel and restaurant at “The Address Citywest” and “McGettigan’s Cookhouse and bar” respectively. To the north and east are separate sporting facilities and R136 Outer Ring Road. Further south of Silken Park, to the south and south-west, is the Citywest Business Campus.

2.4 The Old Naas Road links into the N7 Naas Road, to the north of the site at the Kingswood Interchange and also connects to the R136 Outer Ring Road, which provides direct access to Tallaght Town Centre.

2.5 The site is generally flat with levels at c. 92.5mOD in the north-west corner of the site rising to c. 95mOD in the south-west corner of the site. Running east the west the site is flat. As outlined above, the site fronts onto the Old Naas Road, from where it is proposed to be accessed. There is an existing vehicular entrance at the north-west corner off the Old Naas Road but this is proposed to be closed and new vehicular entrance crated a the south-west corner.



Fig. 1 – Aerial view of application site, outlined in red



3.0 Planning Context

3.1 South Dublin County Development Plan 2016-2022

The proposed development site is subject to two land use zoning objectives; the north western part of the site is zoned Objective LC: *To protect, improve and provide for the future development of Local Centres*, while the remainder, and majority, of the site is zoned Objective RES: *To protect and/or improve residential amenity in the South Dublin County Development Plan 2016-2022*.

There is a specific local objective (SLO) attached to the lands, namely CS6 SLO 2: which states *“That a Local Area Plan be initiated for the community of Kingswood (Naas Road) with a view to the sustainability of this community being protected and which provides for retail and other commercial opportunities and amenities, community facilities, employment opportunities and connectivity to the adjoining residential and commercial areas. The preparation of a Local Area Plan for Kingswood to be initiated within two years of the adoption of this County Development Plan”*.

We note that the Draft South Dublin County Development Plan 2022-2028 was recently on public display and that the subject is proposed to retain the exact same two land use zoning objectives, i.e. LC and RES but that there is no SLO attached to the lands.

We also note that no Kingswood Local Area Plan (LAP) was prepared since the adoption of the current County Development Plan in 2016, therefore it is considered that as we are approaching the end of the lifetime of the current Plan and the fact that no objective to prepare a LAP for Kingswood is identified on the subject lands as part of the Draft Plan, that CS6 SLO 2 is not relevant for the purposes of assessing this application for permission.

The following policies of the CDP are applicable to the proposed development:

HOUSING (H) Policy 6 Sustainable Communities: *“It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities”*.

HOUSING (H) Policy 7 Urban Design in Residential Developments: *“It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended)”*.

HOUSING (H) Policy 8 Residential Densities: *“It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context”*.

HOUSING (H) Policy 11 Residential Design and Layout: *“It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development”*.

HOUSING (H) Policy 12 Public Open Space: *“It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the areas”*.

HOUSING (H) Policy 14 Internal Residential Accommodation: *“It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long term needs of a variety of household types and sizes”*.



The CDP states that the Council is committed to ensuring that best practice urban design principles are applied to all new developments based on the principle that *“well planned and integrated housing, amenities, shops, employment and transport can dramatically enhance the sustainability, attractiveness and quality of an area”*.

This application for permission includes a Design Statement (separate document enclosed) prepared by the project architects Conroy Crowe Kelly (CCK).

The CDP also sets standards for residential development including dwelling sizes, public and private open space provision and car parking provision. The proposed development complies with all standards contained in the CDP, as appropriate.

3.2 Planning History

The following sets out the relevant planning history associated with the subject site:

Ref. ED17/0006 – proposal for the erection of permanent netting structures and supporting wooden poles in three locations on the sport grounds – a decision was made declaring the proposal not exempt.

Ref. SD14A/0032 – permission granted on 4th June 2014 to Clondalkin RFC for a single storey extension, modification and modernisation of the existing clubhouse dressing rooms, showers and changing facilities with new plantroom; replacement of existing 8 no. 10m high floodlights mainly along the southern boundary of pitch no. 2 with modern directional floodlighting comprising 4 no. 18m high lighting columns placed at the corners of pitch no. 2 all with associated site development and landscaping works.

Ref. SD18A/0394 – permission granted on 12th February 2019 to Clondalkin RFC for (a) installation of two 18m high lighting columns on the northern (clubhouse) side of pitch 1 and modern directional floodlighting for pitch 1 from these poles and the existing 18m poles between pitch No's 1 and 2 previously granted permission and (b) ball stop netting along the southern boundary with the Silken Park Housing Development.

4.0 Pre-planning Consultation

A Section 247 pre-planning consultation meeting was held with South Dublin County Council (SDCC) under PP057/21 on 9th June 2021 in relation to the subject application. Matters discussed the meeting included the site layout plan, location of open spaces, access arrangements, design of units and interface with the Old Naas Road. The items discussed at that meeting have been considered and the current proposal reflects the comments of the Planning Authority.



5.0 Clondalkin Rugby Football Club

We enclose a letter from the chairman of Clondalkin Rugby Football Club (RFC), Gerry Gilligan, confirming that the RFC are in the process of developing new, larger grounds for their club to facilitate the growing number of members and teams. The enclosed letter confirms that their current grounds at Gordon Park, i.e. the subject application site, is no longer large enough to cater for the club's needs. They have purchased new grounds in the locality near Baldonnell that they intend to develop for a new clubhouse, 5-6 dressing rooms and an indoor gym. In addition, they intend to develop 4-5 playing pitches, as well as a dedicated children's pitch at the new grounds, this will be a considerable expansion from their current two no. pitches at Gordon Park. By selling the subject site at Gordon Park to the applicant will enable the RFC to gather the necessary funds to expand the club for the local community. We wish to confirm that while the subject site is proposed to be developed for housing, there will be no decrease or impact on community gain as the RFC has purchased new land to further develop their club. Please refer to the aforementioned enclosed letter for further details.

6.0 Existing Facilities and Services in Vicinity

6.1 Part of the application site is zoned objective LC: *"To protect, improve and provide for the future development of Local Centres"*, with residential use being permitted in principle. The proposed any non-residential uses, however, we note that there are a range of existing facilities and other uses permitted in the vicinity, including the Citywest Shopping Centre, which is c.2km to the south-west of the site. The following is a synopsis of some of the services available in the vicinity, including the Citywest Shopping Centre, which will serve a future resident population on the subject site:

- AIB bank;
- Specsavers;
- Dunnes Stores;
- Service Station;
- McGettigan's (bar/restaurant);
- The Address Citywest Hotel;
- Dunnes Stores;
- Regatta Great Outdoors;
- Costa Coffee;
- Carphone Warehouse;
- Eddie Rockets;
- McDonalds;
- Dominos Pizza;
- Browns Barn;
- McCabes Pharmacy;
- Primacare Medical & Dental Care Services;
- Hairdressers & Barbers;
- Financial Services;
- Post Office;
- Dry Cleaners / Laundry Service; Community Services;
- NDLS – National Drivers Licence Service;
- Funky Monkey children's Play Centre.



6.2 In addition to the above specific facilities available in the vicinity, there is a wide range of employment facilities as well as local services including the Powder Room Hair & Makeup Salon, Links childcare facility to the south of the proposed development site, on the Old Naas Road. In the immediate environs of the site, the Old Naas Road / Kingswood Village is predominantly developed for housing and commercial uses. There are five residential developments known as Silken Park, Brownsbarn Court, Brownsbarn Orchard, Brownsbarn Wood and Ardsolus, all of which are south or west of the development site. Commercial uses in the vicinity include a space storage facility, Wilsons Auctions (vehicles / machinery), garden furniture and decking, Bill Griffin motors along with offices to the rear of Silken Park. Further south on the Old Naas Road is the Waterside office development.

6.3 In light of all of the permitted local centre uses in the environs of the site, it is not considered that the provision of any other use other than residential on this site would be appropriate. Given the size of the proposed development, we consider that the level of available neighbourhood/local facilities in the area is sufficient to cater for the needs of future residents of this development and it is put forward that the occupancy of future families on the site will further sustain the viability of the existing services in the area by increasing footfall and in the medium to long term. It is not considered prudent or sustainable to develop the subject site for additional commercial / retail uses given the availability of a wide variety of non-residential uses in the environs.

7.0 Urban Design Considerations

7.1 The concept behind the design of the proposed development is to provide for family type housing that will provide for long term tenure while also reflecting the character of the Old Naas Road / Brownsbarn area. In recent years, this area has been subject to a variety of development in terms of housing and office / commercial development, but this development proposes to reflect the traditional character of housing in the Kingswood / Brownsbarn area while providing for a sustainable housing development.

The development, which fronts onto the Old Naas Road reflects the existing pattern of development of the nearest residential development at Silken Park and matches the building line of development along this streetscape. The proposed houses are traditional in style in terms of the materials proposed, i.e. brick and render. The houses are orientated to benefit from maximum sunlight while the overall design of the scheme has been given careful consideration with particular attention paid to the objectives and policies of the County Development Plan 2016-2022. In addition, the project architects Conroy Crowe Kelly (CCK) have prepared the submitted design statement which also demonstrates the proposed development's compliance with the 12 no. urban design criteria set out in the Urban Design Manual – Best Practice Guide – please refer to the submitted document by CCK.

7.2 Site Analysis

This site fronts onto the Old Naas Road and is flanked by permitted and existing development to the north, west and south. The shape of the site is considered to best accommodate a traditional housing layout with a parkland open space provided at its eastern side. The levels of the site are conducive to the proposed housing layout. In consideration of the pattern of permitted and existing development in the immediate environs, the proposed development, its design and layout will complement same and will consolidate development along this stretch of road. The main advantage to this proposal is the creation of a strong urban streetscape that reflects the pattern of development further south along the road.



7.3 Character Appraisal

The site subject to this application is the current home to the Clondalkin RFC but they are relocating to a new facility near Baldonnel. The site is occupied by playing pitches and associated clubhouse/changing facilities. The site is generally flat and capable of accommodating the proposed housing. The Old Naas Road is characterized by a variety of residential and commercial development. A significant quantum of existing residential development in the vicinity fronts onto the road creating a strong urban edge and is typical of traditional village street frontage. The proposed development will reflect the already established pattern of development along this road by also directly fronting onto the Old Naas Road thus reinforcing the streetscape to create a stronger, more defined urban edge.

In terms of the existing landscape, a full landscaping plan is included with this application while an ecological assessment of the site and proposed development has also been undertaken. Both the landscaping plan and the ecological assessment guided the design and layout of this housing development - please refer to the enclosed documentation by Cunnane Stratton Reynolds Landscape Architects and Enviroguide Consulting, Ecologists for further details.

7.4 Movement Analysis

The site is located adjacent to residential and commercial uses, thus positioning the site in close proximity to employment centres, particularly Citywest Business Campus to the south. A comprehensive road network has been put in place as part of the overall development of the campus. The local area is also served by public transport facilities, including the Luas which is c. 1.3km away from the Cheeverstown passenger stop and 1.5km from the Citywest Campus passenger stop.

The following existing services / facilities that will serve residents of this proposed development are:

- Schools (within 3.2km of a dwelling) – the nearest schools are located south of the site on Citywest Drive, Fortunestown Way and Brookfield Road;
- Public transport – south of the site lies the Luas Red Line, which stops at Citywest Business Campus and Cheeverstown. Citywest Road (to the west) and Kingswood Road (to the east) are served by bus services.
- Neighbourhood Centre and Shops – the main local services in terms of general retailing, along with community, healthcare and banking services are all provided for in the Citywest Shopping Centre which is c. 2km away. Further south-east is Tallaght Town Centre which also provides for a variety of services and retail opportunities.
- Children's play areas – Corkagh Demesne is north east of the site and provides for a 300-acre regional park, bordering a woodland and stream, and provides for a large public area for people of all ages. There is a large playground providing play opportunities for both junior (2-6 years) and senior (6-12 years) age groups which was upgraded in 2006. To the south-west, c. 1.8km away, a new Neighbourhood Park is currently being delivered, while Carrigmore Park lies c. 2km to the south-west.
- Leisure facilities – a number of such facilities including golf courses, neighbouring sports grounds east of site on the Old Naas Road are all in easy reach of the proposed development.
- Community Centres – such facilities are catered for in the nearby Citywest Shopping Centre; Tallaght Hospital is south-east of the site along with a variety of other services in Tallaght town centre.



- Religious facilities – the nearest church is in Saggart Village to the south-west. Saggart Village can be accessed via Citywest Road and Fortunestown Lane.
- Employment – the site enjoys close proximity to Citywest Business Campus, Waterside and Magna Business Park, all of which provides for a wide range of employment opportunities. The site also enjoys a strategic location adjacent to the N7 which provides direct access into the city centre and a wide range of employment facilities. Access to the Luas further enhances such opportunities.

8.0 Proposed Development

8.1 The development that we now seek permission for, and as described in the public notices, is as follows:

Greenwalk Development Ltd seeks permission for a residential development on a site area of 2.28Ha, at Gordon Park, Old Naas Road, Kingswood, Dublin 22. The proposed development site is bounded to the west by the Old Naas Road, to the south by the Silken Park development, and is located in the townland of Brownsbarn.

The proposed development consists of 77 no. dwellings, comprised of 63 no. 2 storey houses, and 14 no. apartments & duplex units accommodated in 1 no. 3 storey building. The proposed houses are comprised of 8 no. 2 bed houses & 55 no. 3 bed houses. The proposed apartments & duplex units are comprised of 7 no. 1 bed apartments at ground floor & 7 no. 3 bed duplex units overhead. The proposed development also provides for all associated site development & infrastructural works, car & bicycle parking, open spaces, hard & soft landscaping, boundary treatments, bin & bicycle storage. Access to the development will be via a new vehicular entrance at the south-west corner of the site, off the Old Naas Road. Permission is also sought to demolish the existing building on site, approx. 455m².

8.2 The proposed development consists of the demolition of the existing structures on site associated with the Rugby Club and the redevelopment of the entire site for residential use, in the form of 77 no. dwellings comprised of 63 no. houses and a block of duplex units and apartments accommodating 14 no. units.

8.3 At this juncture, it is important to note that there is a large watermain crossing the site which essentially generates a wayleave. It takes an angular route in a broadly diagonal trajectory from the southeast and exiting near the existing club entrance at the north-west corner of the site. The wayleave is c.10.4 wide and this combined with required separation distances to other services and buildings creates a considerable area which is not developable in the normal sense.

8.4 In addition, there is an added complication relating to a high-pressure trunk gas main running down the Old Naas Road, and the location of the foul sewer west of it thus requiring a cross-over. The level and location of each is such that we cannot achieve a cross-over at the northern part of the site. We need to be as far south as we can to get the necessary clearances. The effect of this is that the ground levels in the northern part of the site have to be built up in order to get a gravity connection and this in turn precludes access at grade and the use of the existing vehicular entrance to the site. As a direct consequence, the proposed development seeks to close up the existing entrance to the site at the north-west corner and to create a new vehicular entrance at the south-west corner. It is also proposed to create a new pedestrian/cyclist entrance at the north-west corner as indicated on the site layout plan.



8.5 The Old Naas Road has been subject to residential and mixed-use development in recent years with a variety of uses established in the immediate vicinity. This proposed residential development, which include a variety of dwelling types, comprised of traditional materials, along with the scale and character of the proposal will complement the established but eclectic character of the environs.

8.6 The development put forward for permission proposes the construction of 77 no. dwellings on lands that are currently zoned for a mix of local centre and residential land uses, with residential land use being acceptable under both land use zonings, therefore the principle of the proposed development is acceptable.



Fig. 2 – Proposed Site Layout Plan

8.7 Access

The site is proposed to be accessed via one new vehicular access point at the south-western corner of the site, directly onto the Old Naas Road. The main internal access road loops in from there in a well enclosed street, first with an unfolding contained view, then rounding the first bend, a framed forward view of the small park is seen, then reaching the green space there is a sense of arrival. The road continues to past the duplex block, and access the housing terrace facing its space. The scheme was originally considered as loop road connecting two entrances, but this transpired not to be possible for vehicles. The loop however is there for pedestrians, thus



ensuring permeability throughout the entire site. A tear drop turning facility allows refuse vehicles and other traffic to return as it came in without reversing movements.

8.8 Schedule of Proposed Accommodation

This application for permission proposes the development of 77 no. dwellings, comprised of 63 no. houses and 14 no. duplexes and apartments. Further details of the schedule of accommodation are set out in Tables 1 & 2. This application for permission is being put forward in accordance with the policies and objectives of the relevant Development Plan but also in consideration of the pattern of development in the environs.

The development subject to this application is comprised of 8 no. 2 bed houses and 55 no. 3 bed houses. There is one three storey building also proposed which accommodates 14 no. units, i.e. 7 no. 1 bed ground floor units and 7 no. 3 bed units overhead.

The proposed housing mix reflects the Development Plan requirements for dwelling types whilst providing for family type housing that caters for different lifecycle stages as well as consumer choice. House sizes range from a minimum of 84sq.m to a maximum of 127.4sq.m.

The proposed apartments range in size from c.54-55sq.m for 1 bed units, with the 3 bedroom duplex units ranging from c. 120sq.m up to c. 127sq.m being 123sq.m. each, all of which exceed the minimum standards prescribed by both the 2020 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities and the current South Dublin County Development Plan (Table 11.21 of same). A breakdown of the proposed house types is provided in Table 1 below:

Unit Type	Description	No. of Units	Floor Area (m ²)	Total Floor Area (m ²)
E2	3 bed house corner house	4	110.4	441.6
E2A	3 bed house corner house	1	110.4	110.4
E2X	3 bed house corner house extended	5	128	640
E3	3 bed end of terrace house	1	127.4	127.4
N1	3 bed mid terrace house	25	111.6	2,790
N2	3 bed end of terrace house	17	114.3	1,943.1
N5	3 bed wide frontage house	2	120.6	241.2
N7	2 bed mid terrace house	8	84	672
Total		63		6,965.7m²

Table 1: Proposed Schedule of Accommodation – Houses



The 14 no. proposed apartments and duplexes are accommodated in the single proposed duplex block at the western end of the site, facing onto the Old Naas Road, and the following is a breakdown of the units within same:

Type	Description	No. of Units	Floor Area (m ²)	Total Floor Area (m ²)
D1 - Ground Floor	1 bed apartment	1	55.7	55.7
D2 - Ground Floor	1 bed apartment	5	53.2	266
D3 – Ground Floor	1 bed apartment	1	54.8	54.8
D4 – First & second Floor	3 bed duplex unit	1	123.2	123.2
D5 – First & second Floor	3 bed duplex unit	5	119.8	599
D6 – First & second Floor	3 bed duplex unit	1	127.5	127.5
Total		14		1,226.2m²

Table 2: Proposed Schedule of Dwellings within the Duplex Block

The total proposed residential floor space, with the proposed houses, duplex units and apartments combined is 8,191.9m².

Please note that CCK Architects have prepared the enclosed Housing Quality Assessment (HQA) which demonstrates that all of the proposed dwellings either meet or exceed the required internal accommodation standards as per the Development Plan, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018 and the Quality Housing for Sustainable Communities Guidelines, 2007 – please refer to the submitted HQA for details.

A mix of 2 and 3 bedroom, traditional style houses are proposed, along with 1 no. 3 storey building accommodating the apartments and duplex units. All dwellings benefit from dual aspect, while the proposed internal layouts have been designed to provide generous living accommodation on the ground floor with master and secondary bedrooms on the first floor. The kitchen / dining / living space provided to each house benefits from direct access and a strong visual relationship with the rear garden. A breakdown of living and bedroom sizes is provided in the enclosed HQA.

8.9 Design Concept

The site has an existing stone wall along its western boundary at its interface with the Old Naas Road and the proposed frontage of the development onto the public realm takes its cue from the existing character of the Old Naas Road, i.e.: the trees with the sense of something behind, the limestone wall and rural feeling verge, and the absence of suburban footpaths.

As part of the proposed development, the front wall is retained and extended along portions of the boundary where it has been lost. The footpath is pulled into the scheme and the rural verge and trees remain. The wall is kept at its existing height which allows pedestrians behind to see and be seen by passing traffic. There is continuous



frontage development providing passive surveillance. The ground at the duplex block is raised by over a meter and this is concealed behind the new length of limestone faced wall. A railing is mounted on top for safety and as the level change gradually tapers out, the path drops relative to the wall until it is at the same level as the verge.

It is considered that duplex buildings provide scale but also a village grain, sympathetic to the character of the village, and in keeping with the three storey element fronting onto the street to the south at Brownsbarn Gardens, and opposite at Brownsbarn Wood. The duplex edge is close to the road and continues in a terrace of houses slightly set back with room for a verge wide enough to plant without tree pits. This allows continuity of the veil of roadside trees and compensates for the loss of one tree to form the new proposed vehicular entrance and gain sightlines.



Fig. 3 – Proposed street elevation onto the old Naas Road

Please note that an arborists report on the condition of existing trees on site is enclosed – please refer to same for details on the existing roadside trees. While they are young and vigorous, they are multi stemmed and may need gradual replacement over time.

The duplex building has entrance doors on both the street and inner elevations thus ensuring activity on both sides. Private terraces, both at ground and first floor, face out over the enclosed communal garden to the rear (east). The orientation is just south of east.

The proposed houses are in terraces and provide strong continuous street frontages. Corner houses are employed whereby the roof is turned 90° with a gable ending the terrace, and a full entrance elevation is provided on what would otherwise have been the side of the house. This provides good passive surveillance and is used along with kitchen extensions that extend the built edge where two such houses occur back-to-back. This greatly reduces the length of exposed rear garden wall. The side walls do, however, allow for the relief of some street side foliage, and only occurs where there are houses opposite providing overlooking.

The proposed public open space is located where it can feel like a continuation of the landscaped sports ground beyond and so giving it a feeling of space beyond its size. Its location at the south-eastern part of the site follows the line of the existing open space in Silken Park to the immediate south. It should also be noted that while there is no consent in place to provide direct connections into adjoining lands, the layout of the proposed open space facilitates future connection into Silken Park's open space, if/when the necessary consent arises. In addition, we note that there is an existing pedestrian gate at Silken Park (adjacent to house no.s 51 & 52 Silken Park) that interfaces with the south-western corner of the subject application site and the proposed site layout plan allows for direct pedestrian connection into same (adjacent to the proposed house no. 24).

Given the relocation of the Clondalkin RFC to a new larger facility, the subject site, given its land use zoning, now lends itself to be appropriately developed for housing. The proposed scheme has been designed to form a natural extension of Kingswood Village and the access at the village end of the site supports its sense of proximity. The design has sought to build on the character of the Old Naas Road approach, particularly the leafy end, and within the site to exploit views over the extensive Roadstone sports grounds to provide for a strong sense of place.

Building forms are simple vernacular shapes, responding to the need for strong frontages, turning corners well and creating a human-scale intimate neighbourhood. Materials are durable and traditional; good quality well-detailed brick facades and slate roofs.



8.10 Density

The proposed development comprises 77 no. dwellings on a gross site area 2.28Ha, with the proposed development having a gross and net density of 34 units per hectare, in accordance with the guidance set out in the 2009 Sustainable Residential Development in Urban Areas Guidelines (Appendix A). There are constraints on site in terms of wayleaves and utilities that have dictated the layout of the proposed site plan.

We note that under section 112.6 of the current Development Plan that it states: *“Applications for residential development will be assessed against the design criteria set out in Sustainable Residential Development in Urban Areas and the companion Urban Design Manual. The Urban Design Manual is primarily focused on design issues associated with housing schemes of 30-50 units per hectare, but is also relevant to schemes of a higher or lower density and mixed use development”*. Also set out in the Development Plan, under section 11.3.1 (ii) *“Residential Density”* the following is stated: *“In general the number of dwellings to be provided on a site should be determined with reference to the Departmental Guidelines document Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009). As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high capacity public transport facilities. In accordance with Departmental Guidance, the residential density (net) of new development should generally be greater than 35 dwellings per hectare, save in exceptional circumstances. Local Area Plans, SDZ Planning Schemes and Framework Plans will set out density bands in growth areas”*.

Notwithstanding the above quoted text from the relevant Plan, i.e. the South Dublin County Development Plan, we note that in April 2021, the Department of Housing, Local Government and Heritage (DoHLGH) issued Circular Letter NRUP 02/2021 in relation to residential densities, which essentially outlined *“that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village”*.

Both we and the aforementioned circular acknowledge that *“Section 5.11 of the Sustainable Residential Development Guidelines states that for Outer Suburban/Greenfield sites within cities and larger towns, the density of development should be in the general range of 35-50 dwellings per hectare”*. It should also be noted that Section 5.11 of the guidance also states that development at net densities of less than 30 dwellings per hectare is generally discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares, and to which the current proposal complies.

Based upon the guidance set out in Circular Letter NRUP 02/2021, we note that the DoHLGH stated that *“it is necessary for An Bord Pleanála and Planning Authorities to exercise discretion in the application and assessment of residential density at the periphery of large towns”* and that *“the full range of outer suburban density, from a baseline figure of 30 dwellings per hectare (net) may be considered”*.

Taking all of the foregoing into account, the proposed development provides for a net and gross density of 34 units per hectare which is put forward as complying with the aforementioned Guidelines in that the development is being delivered at a greater density of 30 units per hectare but that the proposed development also complies with recent guidance issued by DoHLGH whereby density ranges of 30-50 units per hectare can be applied and therefore considered appropriate.

Notwithstanding the above, if the proposed area of public open space being provided as part of the application site i.e. 0.258Ha is discounted from the gross site area i.e. 2.28Ha, it leaves a net developable area of 2.02Ha, which produces a resultant net density of 38 units per hectare.

It is therefore respectfully put forward that given the locational context of the application site and the existing character of the environs that the proposed density is in accordance with current guidance regarding same.



8.11 Open Space Provision

8.11.1 Public Open Space

The primary public open space is proposed at the eastern end of the site, with an area of 0.258Ha of open space proposed which equates to over 11% of the application site area. The "RES" land use zoning attached to the site requires that new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space, under section 11.3.1 of the Development Plan.

The location of the public open space along the eastern boundary has been carefully considered whereby it can feel like a continuation of the landscaped sports ground beyond and so giving it a feeling of space beyond its size. Attenuation and suds will be integrated to compliment its biodiversity and ecological quality. The proposed landscaping design has been prepared by Cunnane Stratton Reynolds Landscape Architects and caters for a kick-about area as well as children's playground to include natural play elements.

Incidental open space is also provided along the Old Naas Road frontage. This comprises threshold planting on front of the duplex building, and a wider planted band on front of the houses which serves to reinforce the tree planting along the front (western) limestone boundary wall. Further incidental planting is located along the northern boundary providing a landscape context for the parking. Please refer to the enclosed Cunnane Stratton Reynolds Landscape Architects drawings for details of the proposals.

8.11.2 Communal Open Space

The proposed duplex building accommodates 7 no. 1 bed ground floor apartments with 7 no. 3 bed duplex units overhead. In accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018, these units require c. 84m² of communal open space. To the rear / east of the proposed building, an area of 375m² is provided for which will be bounded by an estate railing of c. 1.5m high to delineate this area separate from the public realm. This space will be in the charge of a management company and the residents of the duplex building will have direct access to same.

8.11.3 Private Open Space

Each of the proposed houses has been provided with private open space in the form of private rear gardens. Please refer to the enclosed site layout plan (drawing no. P-1001) which details the quantum and form of private open space. All of the houses have been provided with the necessary private open space meeting the standards of the Development Plan, i.e. 55sq.m for a 2 bed house and 60 sq.m for a 3 bed house.

The proposed ground floor apartments have private open space in the form of ground floor terraces while the duplex units overhead have balconies at first floor level overlooking the adjacent communal open space. A full breakdown of the private open space for the proposed apartments and duplex units are details on the enclosed plans for same as well as the enclosed HQA – please refer to same.

8.12 Car Parking

Car parking for the proposed development is provided in the form of surface parking, with a mix of on-street spaces and on-curtilage car parking spaces, all of which can be identified on the enclosed site layout plan (drawing no. P-1001).



Car parking is proposed at a rate that accords with the standards of the Development Plan, i.e. Table 11.24. Full details of the car parking provision and rationalisation for same is set out within the enclosed Traffic and Transport Assessment (TTA) prepared by Pinnacle Engineering (section 3.4) – please refer to same. A summary of same is as follows:

- 122 no. of car parking spaces are proposed for the houses;
- 16 no. of car parking spaces are proposed for the apartment/duplex units;
- Total = 138 no. car parking spaces.

Car parking for the duplex units and apartments is proposed in accordance with the 2018 Sustainable Urban Housing – Design Standards for New Apartments, which set out alternative criteria for the provision of car parking spaces based on the link between the proposed development, access to local amenities and access to public transport.

All of the proposed car parking is at surface level, as illustrated on the enclosed site layout plan (drawing no. P-1001).

The landscaping proposals have taken into consideration the proposed car parking layout through the use of planting and materials (refer to the enclosed Landscape Proposals). Off-street car parking will be absorbed into the streetscape through the use of soft landscaping, while on-street car parking is clustered in small parking bays.

In relation to car parking for electric vehicles, it is proposed to cater for the charging of battery operated cars within the curtilage of the houses which will comply with the Development Plan requirements to provide for 10% of such spaces as part of the overall car parking, while in the proposed grouped parking, provision for charging is provided at the back of the footpath. Please note that Morley Walsh Consulting Engineers have prepared the enclosed EV charging strategy – please refer to same. This report confirms that it is proposed to provide for EV charging to all dwellings with on-curtilage parking. An external power point will be provided externally to each dwelling to facilitate charging while parked on the driveway. In relation to the proposed Duplex block, it is proposed to provide 14 communal car parking spaces. As per the requirements of TGD Part L, ducting infrastructure shall be provided to all spaces to enable subsequent installation of charging points. It is further proposed to install 2 no. EV charging points to cater for these spaces.

Pinnacle Consulting Engineers have prepared all of the enclosed traffic/roads drawings and details – please refer to same.

8.13 Childcare Provision

The current application does not propose the development of a childcare facility as it was considered that the current proposal does not require same. The proposed development consists of 77 no. dwellings, with the 2001 Childcare Facilities Guidelines requiring 20 no. childcare places for every 75 no. dwellings. However, if one discounts the 7 no. 1 bedroom units proposed, which would not reasonably be expected to have childcare needs, that would result in 70 no. dwellings requiring childcare services, which negates the need for the proposed development to have its own childcare facility, in accordance with the 2001 Guidelines.

We are aware of a number of permitted / existing childcare facilities in the environs that we consider to be sufficient to cater for the childcare needs of the proposed development. In addition, we enclose a letter from Links Childcare who are located to the south of the site, also on the Old Naas Road, which confirms that they are not operating at full capacity. The following sets out a list of extant permissions in place in the environs which include childcare facilities as follows:



- Ref. SD16A/0078 – permission includes a childcare facility of c. 203sq.m on a site located south-west of the current application site, c. 2km away.
- Ref. SD14A/0121 - permission includes a childcare facility of c. 520sq.m on a site located south-west of the current application site on Fortunestown Lane, c. 2.5km away;
- Ref. SD15A/0127 – permission provides for a creche facility of 615sq.m as part of Phase 1 of Citywest Village, c. 1.3km to the south-west.
- Ref. ABP-302398-18 – permission provides for a creche facility of 327sq.m
- Ref. ABP-305556-19 – permission provides for a creche facility of 265sq.m
- Ref. ABP-3055563-19 – permission provides for a creche facility of 431sq.m
- Ref. ABP-306602-20 – permission provides for a creche facility of 587sq.m

Taking the abovementioned extant permissions for childcare facilities into consideration, along with the list below:

Kilnamanagh Kids Crèche & Montessori School
36 Tamarisk Lawns,
Kilnamanagh
Dublin 24
Dublin

Laugh and Learn Preschool & Afterschool – Tallaght
Cookstown Way,
Tallaght
Dublin 24

Cocoon Childcare Citywest
Belfry Ave
Citywest, Dublin 24

Links Childcare Citywest
Citywest Business Campus
Dublin 24

Cocoon Childcare Tallaght
27 Marfield Mall, Kiltipper, Tallaght
Tallaght, Dublin 24

New Best Start Early Year Service
Fortunestown Way,
Tallaght
Dublin 24

Taking all of the foregoing into consideration, it is put forward that the level of existing and permitted childcare facilities in the area is sufficient to cater for the childcare needs that may arise from the proposed development.

8.14 Physical Infrastructure / Services

Proposals for the provision of services / infrastructure have been prepared by TJ O'Connor & Associates Consulting Engineers and are described in the enclosed engineering drawings and reports – please refer to same for details.



9.0 Part V Proposal

9.1 Our client intends to fully comply with the requirements of Part V of the Planning and Development Act 2000 (as amended) and the Housing Strategy of South Dublin County Council with respect to the provision of Social Housing. In the event of a condition, in respect of Social Housing, being attached to a grant of planning permission, our clients will comply with the Council's requirements.

9.2 In the case of this proposed residential development of 77 no. units, the applicant fully intends to comply with the provisions of Part V of the Planning and Development Act 2000 (as amended) and with the requirements of the Housing Department in relation to the provision of Social Housing, in the event of a condition for the provision of same being attached to a grant of permission for this development. To this end, it is proposed to provide 8 no. units and we enclose indicative costings re same. The proposed social housing units are 7 no. 1 bed, ground floor, own door units, as well as 1 no. 3 bed duplex units all located within the proposed duplex building. This proposal put forward by the applicant is subject to agreement with the Housing Department of South Dublin County Council prior to the lodgement of a commencement notice, in accordance with the relevant statutory provisions. The applicant encloses as part of this application the necessary details in relation to Part V proposals for the purposes of validating this application for permission. The units to be acquired and acquisition prices etc. are to be agreed subsequent to a grant of permission and prior to lodgement of commencement notice. We acknowledge that there is a Part V requirement of 10% of the units so in this case that equates to 8 no. units, which is subject to a grant of permission, however, should the number of permitted dwellings be less than the current proposal then it is considered that the Part V requirement may be less than 8 no. units.

9.3 Please note that the Part V proposal, including drawings and costs, were submitted to the Housing Department of SDCC prior to the lodgement of this application. Please refer to the enclosed costings and a letter from the SDCC Housing Department (dated 04.11.2021) confirming that the applicant has engaged with them prior to the submission of this application.

10.0 Natural Heritage

10.1 An Appropriate Assessment Screening Report of the proposed development on the subject lands was undertaken by Enviroguide Consulting and is included as part of this application – please refer to same. Article 6(3) the 'Habitats' Directive 92/43/EEC requires that an "appropriate assessment" be undertaken for any plan or project that is likely to have an impact on a Natura 2000 site i.e. a Special Area of Conservation (SAC) or a Special Protection Area for Birds (SPA).

10.2 Article 6(3) requires a thorough application of the requirement to undertake an appropriate assessment of the ecological implications of any plan or project, whether within or outside of a designated site, which may impact upon its stated conservation objectives.

10.3 The Appropriate Assessment procedure is a two-step process, involving an initial screening of the plan or project to determine the likelihood of potential impacts arising from the plan and then when necessary, a second step involving a process of appropriate assessment where a potential impact has been determined during the screening process which cannot be avoided or mitigated against.

10.4 The Appropriate Assessment Screening Report has been undertaken in accordance with Guidance produced by DOEHLG in 2009 and documents produced by EU "Assessment of Plans and Projects Significantly



Affecting Natura 2000 Sites – Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the ‘Habitats’ Directive 92/43/EEC”. The first stage in Appropriate Assessment is the production of a Screening Report. The aim of screening is to discover whether the project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives. The methodology adopted in the enclosed Screening Report follows that recommended in the DOEHLG Guidelines. It follows a logical sequence and ensures that the recording and reporting of information is manageable and proportionate.

10.5 Enviroguide Consulting ecologists have carried out the enclosed Appropriate Assessment Screening Report and a summary of same is as follows:

Field surveys were carried out by Enviroguide Consulting on the 13th of July 2021. The Site was surveyed for any potentially important ecological receptors to inform the completion of the AA Screening Report.

The guidance document published by the Department of Housing, Planning and Local Government (then DEHLG) *‘Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities’* (2009) recommends a distance of 15km as the precautionary Zone of Influence (ZOI) for a plan or project being assessed for likely significant effects on European Sites, stating however that this should be evaluated on a case-by-case basis, with sites outside 15km included in the assessment depending on the likely impacts of the project and the sensitivities of the ecological receptors, bearing in mind the precautionary principle (e.g. where a hydrological pathway is present it may be necessary to assess sites outside the 15km limit). As such, the 15km ZOI is used in the submitted AA Screening report as an initial starting point for collating European sites for AA screening.

The following European Sites are within 15km of the proposed development:

- Red Bog, Kildare SAC – 13.5km to the south-west;
- Wicklow Mountains SAC – 7.3km to the south;
- Glenasmole Valley SAC – 5.5km to the south-east;
- South Dublin Bay SAC – 14.2km to east;
- Rye Water Valley / Carton SAC – 8.4km to north-west;
- North Dublin Bay SAAC – 17km to the north-east;
- Poulaphuca Reservoir SPA – 13.8km to the south-west;
- Wicklow Mountains SPA – 10.3km to the south-east;
- South Dublin Bay & River Tolka Estuary SAP – 14.2km to the east;
- North Bull island SPA – 17km to the north-east.

The submitted AA Screening Report concludes that the proposed development at Gordon Park, Kingswood, Dublin 22 has been assessed for its potential to result in likely significant effects on European Sites, with the following factors considered:

- the nature, size and location of the proposed development and possible impacts arising from the associated construction works and its operational lifetime;
- the potential for in-combination effects alongside other plans and projects leading to effects on European Sites;
- the qualifying interests and conservation objectives of all relevant European Sites.

In conclusion, upon the examination, analysis, and evaluation of the relevant information, and in applying the precautionary principle; Enviroguide Consulting ecologists conclude that, on the basis of objective information, **the possibility may be excluded** that the proposed development will have any significant effect on the European Sites listed below:



- Wicklow Mountains SAC [002122]
- Rye Water Valley/Carton SAC [001398]
- Glenasmole Valley SAC [001209]
- Red Bog, Kildare SAC [000397]
- South Dublin Bay SAC [000210]
- North Dublin Bay SAC [000206]
- Wicklow Mountains SPA [004040]
- South Dublin Bay and River Tolka Estuary SPA [004024]
- North Bull Island SPA [004006]
- Poulaphouca Reservoir SPA [004063]

The report states that *“these complete, precise, and definitive findings, based on the best available scientific evidence, remove all reasonable scientific doubt that the proposed development will have any significant effects on the European Sites detailed above. It should be noted that no measures intended to avoid or reduce the potential harmful effects of the project on any European Site have been taken into account in this Appropriate Assessment Screening Report and its conclusions”*.

11.0 Ecological Impact Assessment

The applicant engaged the services of Enviroguide Consulting to prepare an Ecological Impact Assessment (EclA) of the proposed development, and includes a Bat Survey, which was undertaken on site in July 2021, and a copy of same is submitted as part of the this application for permission – please refer to same for further details.

12.0 Public Lighting

12.1 We enclose a Public Lighting layout plan for the proposed development, which has been prepared in conjunction with the landscaping proposals. Please refer to enclosed drawings and report prepared by Redmond Analytical Management Services.

13.0 Project Construction Waste and Demolition Management Plan

13.1 AWN Consulting have prepared the enclosed Project Construction Waste and Demolition Management Plan for the proposed development – please refer to same. This report takes into consideration the proposed demolition of all existing structure on site.



14.0 Noise Assessment

14.1 The applicant has engaged the services of AWN Consulting to prepare the enclosed inward noise assessment—please refer to same. This assessment asserts that a baseline noise survey has been undertaken at the development site to determine the existing environment there. Based on the survey results on site, the assessment has classified the development site as having a range of noise risks associated with a 'low' to 'medium risk'. The enclosed report provides further discussion in terms of the likely noise impact of both the external and internal areas of the proposed development. The assessment finds that it will be necessary to use appropriate glazing elements to meet the recommended internal noise levels. Regarding ventilation strategy, background ventilation via in-wall vents/ trickle vents is proposed and therefore there is not a requirement to open windows.

14.2 Based on the predicted external noise levels across the site, noise levels in rooms in the vast majority of units will be within the 'Good' and 'Reasonable' ranges set out above. In a small number of units, i.e. those overlooking the Old Naas Road, should an occupant decide to open a window, noise levels internally will increase.

14.3 The report concludes that *"appropriate acoustic glazing and ventilators have been recommended to facades overlooking the Old Naas Road. Based on the implementation of the measures outlined in this assessment, the predicted noise levels conform to the criteria taken from BS8233:2014 for acceptable internal noise levels. It should be noted that the predicted internal noise levels detailed above assume that windows and doors will be closed and vents will be open. As discussed in Section 4.1.2 there is no requirement for assessment of internal noise levels with windows open, however it is expected that a good portion of site will achieve at least 'reasonable' internal noise levels with windows open"*.

15.0 Conclusion

15.1 The proposed development site is currently occupied by the Clondalkin RFC, but as outlined above and in their accompanying letter, the Rugby Club is moving away from Gordon Park to a larger facility near Baldonnel, thus remaining within the local community. As a direct consequence, the proposed development is being put forward for permission as it is considered to be an efficient use of zoned serviced land. The site can architecturally support a development such as that currently proposed, which has the capacity to stand on its own merits using plot proportions, heights and traditional materials. The proposed development is modern with a use of traditional materials throughout, is considerate of the existing built fabric along the Old Naas Road and is on par with other modern developments in the area. We assert that the development is acceptable in terms of use, residential density and mix of dwelling types.

15.2 The proposed development of 77 no. dwellings provides for a high quality design of varying house types that is laid out in a traditional manner. The site also enjoys close proximity to a wide range of existing local services and facilities. The proposed development accords with the zoning objectives attached to this site, with residential use being an appropriate land use. The development put forward for permission accords with recommended densities while the layout and landscaping will provide for a good level and quality of residential amenity.



15.3 The overall development proposal is the result of informed design decisions that have been the outcome of numerous design team meetings and pre-planning consultation with the Planning Authority. The proposed development is consistent with the County Development Plan policies and objectives and comprises a high standard of residential development in accordance with the Department of the Environment, Heritage and Local Government best practice guidelines for Quality Housing for Sustainable Communities, Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and associated Urban Design Manual Best Practice Guidelines (both 2009) and the 2018 Sustainable Urban Housing: Design Standards for New Apartments (as amended).

15.4 The development of this site for housing and open spaces is appropriate given the mix of land uses in the immediate environs. We request that the Planning Authority positively considers this application for permission to allow development to proceed such that much-needed housing can be delivered. The quantum of dwellings put forward for permission is pragmatic in terms of delivering a viable development and providing for much needed housing and therefore ought to be granted permission.

15.5 We trust that the Planning Authority will give due consideration to the merits of this application and we look forward to a favourable decision to grant permission in due course,

Yours sincerely,

Tracy Armstrong, MRUP MIPI MRTPI
Armstrong Fenton Associates



Site Statistics:

Total Proposed Development:

- 77 no. dwellings comprised of:
- 63 no. houses
- 7 no. apartments
- 7 no. duplex units

Housing Mix:

- 55 no. 3 bed houses
- 8 no. 2 bed houses
- 7 no. 1 bed apartments,
- 7 no. 3 bed duplex units.

Total Floor Area:

- Houses = 6,965.7m²
- Apartments & Duplexes = 1,226.2m²
- Total = 8,191.9m²

Site Area: 2.28 hectares / 5.63 acres

Zoning:

- Objective LC: *To protect, improve and provide for the future development of Local Centres, and*
- Objective RES: *To protect and/or improve residential amenity in the South Dublin County Development Plan 2016-2022.*

