



**Ronan MacDiarmada + Associates Ltd.**  
**Landscape Architects and Consultants**  
Rathcoole, Co. Dublin

## **Response to ABP & SDCC**



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**St. Edmunds, St. Lomans Road,**  
**Palmerstown, Dublin 20.**



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RE:

An Bord Pleanála & South Dublin County Council

Written opinion on a proposed strategic housing development on lands

at

St. Edmunds, St. Lomans Road, Palmerstown, Dublin 20.

Ref: ABP-310930-21/ SDCC - SHD1SPP003/21

Our Ref 2016 – 1470

09.12.21

Dear Sir /Madam,

Please find response to An Bord Pleanála & South Dublin County Council, written opinion on a proposed strategic housing development on lands at St. Edmunds, St. Lomans Road, Palmerstown, Dublin 20. Ref: ABP-310930 - 21/ SDCC - SHD1SPP003/21

Please find our response to these items thus:



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An Bord Pleanála	Response
Opinion – Item 3.  3. Landscape drawings clarifying the quantum of public open space proposed and the quality, functionality / usability of the public open space. Any deviation from policy requirements should be highlighted and consideration as to whether a material contravention arises.	<p>Response:</p> <p>The quantum of Public Open Space is identified in the Landscape rationale, it has been broken down into Public and Communal Open Spaces. The architects on the project have also developed the same open space drawing. The Quality, functionality and usability of the open space has been developed with the end user as the focal point. It has been developed to provide a wide range of amenity and activity on the main open space. A large kick about with goal posts on either end is proposed, a number of play items for children aged 2 – 12 years old are also included. The natural play items, rocks and tree trunks have been located along with the slopes and mounds proposed for the open space. The path proposed is a circuitous one providing opportunity for active recreation, congregation and interaction . The design rationale for the open space is included in the rationale. There is no deviation from policy requirements in particular chapter 4 of the <b>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns &amp; Villages) May 2009</b></p> <p><i>4.15 Public open space can have a positive impact on physical and mental well being as it provides spaces to meet, interact, exercise and relax. It needs to be appropriately designed, properly located and well maintained to encourage its use. It is one of the key elements in defining the quality of the residential environment. Apart from the direct provision of active and passive recreation, it adds to the sense of identity of a neighbourhood, helps create a community spirit, and</i></p>



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*can improve the image of an area (especially a regeneration area).  
Well-designed open space is even more important in higher density  
residential developments.*

*4.17 ....allow a more flexible approach to open space requirements  
within housing schemes by way of more casual spaces suitable for  
smaller children's play, informal kick-about and passive amenity...'*

The proposed development meets the qualitative standards as set out in the  
Guidelines for Planning Authorities on Sustainable Residential Development in  
Urban Areas (Cities, Towns & Villages) May 2009

*4.18 Development plans have tended in the past to emphasise detailed  
quantitative standards, but there is now an increasing focus on the  
quality of public open space, which ensures that the reasonable  
expectations of users are more likely to be fulfilled. Qualitative  
standards include:*

***Design*** ... 'designed to meet a range of user needs, including  
both active and passive recreation....'

***Accessibility*** ..... 'Local parks should be located to be within not  
more than 10 minutes' walk of the majority of homes'..... Playgrounds should be  
carefully sited within residential areas so that they are both easily accessible and  
overlooked by dwellings, while not causing a nuisance to  
nearby residents.'



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*Variety ‘... balance will be required between the provision of active and passive recreational facilities.’*

**Biodiversity:** ‘... provide for a range of natural habitats....’

A range and number of trees are proposed for the open space, along with landform being shaped. It was proposed to use bulb and wild flower within the open space but this has reduced to the large margin as per request from the local authority

The use of Suds has combined well within the proposed development, the open space has incorporated a detention basin which shall be used as a football, kick about area.

**Sustainable Urban Drainage Systems** (see para 4.29) are often used to reduce the impact of urban runoff on the aquatic environment.

There is an excess of 10% public open space within the development

As per the local authority development plan, the 10% has been achieved and indicated on Dwg. 06

*Section 11.3.1 (iii) Public Open Space/Children’s Play*

*In [RES] zones all new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space. ....’*



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<p>4. A plan of landscape proposals clearly delineating communal and private spaces should also be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required. The appearance of surface car parking in the landscape should be considered with increased greening of these areas. Detail of boundary treatment should be provided.</p>	<p>Response:</p> <p>A plan delineating the communal and the private spaces is shown in the accompanying Rationale Document. Breakdown of the areas is also indicated. The landscape Rationale details the design development of the Landscape, provision of seating, paths, paving, trees, hedging and railing. The landscape design has been developed to provide the active and passive recreational needs, for all age groups. The surface car parking along the entrance road, in the grass margin have been removed to allow for Tree Planting, Suds and planting.</p>
<p>5. Provision of pedestrian links through open space areas should be detailed with consideration of links to public transport. Provision of a pedestrian link through the area of landscape in SDCC ownership, from the street to the area to the north of the site.</p>	<p>Response:</p> <p>A pedestrian link through the area of landscape in SDCC ownership, from the street to the area north of the site has been indicated on the Masterplan drawing.</p>
<p>8. A report that specifically addresses the proposed materials and finishes of buildings, landscaped areas and any screening/boundary treatment. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development.</p>	<p>Response</p> <p>The materials for Paving, planting, railings, seating have been included in the Landscape Rationale. They have been detailed on the drawings with images in the rationale. It is recognised to provide a range of materials and planting to create a sense of place and distinctive character for the development. It must be understood that as a private development the use of different materials in public</p>



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	spaces, to create a distinctive character is more acceptable because the palette of materials for Taking in Charge standards by the local Authority is limited. The design development took cognisance of this.
South Dublin County Council	Response
<p>Main Concerns:</p> <ol style="list-style-type: none"><li>1. Adequate public open space provision to the appropriate standards including adequate upgrading of accessible public open space in SDCC ownership to the east of the site.</li><li>2. Adequate provision green infrastructure including street trees.</li><li>3. Adequate play provision</li><li>4. Protection of existing trees, hedgerows to be retained and of local biodiversity</li><li>5. Potential impacts on bats (foraging routes)</li></ol>	<p>Response:</p> <p>There is an adequate open space provision to the appropriate standards. The original design for the upgrading of accessible public open space in SDCC ownership to the east of the site, has been removed at the request of SDCC Parks department. The landscape terraces have been removed and the designed path has also been removed at the request of SDCC Parks department.</p> <ol style="list-style-type: none"><li>2. Adequate provision of green infrastructure, including Street trees. The number of proposed trees exceeds the existing number of trees on site .</li><li>3. There is an adequate level of play provision. Rather than insular playground , it is proposed to integrate the entire open space as a large amenity space.</li><li>4. The existing trees shall be retained, however they are of poor quality. We have a preference to replace the existing trees to the western side of the development with mature lime or similar native tree. We feel that this would be a more sustainable approach to the delivery and retention of biodiversity and green corridors. The existing trees to the Eastern side of the development on the SDCC lands shall be retained.</li><li>5. The trees on the western side of the development shall be retained. The existing trees to the Eastern side of the development on the SDCC lands shall be retained. It is proposed to plant trees throughout the development and connect with the existing tree lines. Therefore the existing foraging routes shall be retained and augmented by future tree planting.</li></ol>





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<p>The Public Realm Section has assessed the proposed development in accordance with the County Development Plan and best practice guidelines and recommends the following:</p> <p>1. Landscaping of Public Open Space in SDCC Ownership for Taking in Charge</p> <p>The applicant is requested to submit a revised landscape plan and details to incorporate the following:</p> <p>i. The applicant shall remove proposals for signage in Public Open Space in SDCC Ownership.</p> <p>ii. The surface treatment of the proposed path within the Public Open Space in SDCC Ownership is to be concrete to match existing (proposal is for coloured tarmac or dust). Details are required to demonstrate the proposed path is accessible. Details to include longitudinal section with gradients indicated.</p> <p>iii. The proposed swale running through the centre of South Dublin County Council lands to the east shall be removed due to complexity regarding maintenance. All surface water run off shall be managed via the proposed swales at the top and bottom of slope in this location. These swales shall be grassed finish at the surface with a stone infiltration trench beneath if required. All details for proposed surface water swales to the east of the site within South Dublin County Council lands must be agreed with the Council's Public Realm department to</p>	<p>Response:</p> <p>1. The development shall be privately managed, the comments in relation to materials and levels have been adapted from SDCC parks comments and shown on the proposed plan and rationale.</p> <p>(i) Proposals for signage in Public Open Space in SDCC Ownership have been removed.</p> <p>(ii) The surface treatment of the proposed path within the Public Open Space in SDCC Ownership is to be concrete to match existing path in the SDCC lands, Details demonstrating the proposed path is accessible, is shown with longitudinal section with levels and gradients indicated</p> <p>(iii) The proposed swale running through the centre of South Dublin County Council lands to the east shall be removed. All surface water run off shall be managed via the proposed swales at the top and bottom of slope in this location. These swales shall be grassed finish at the surface with a stone infiltration trench beneath. All details for proposed surface water swales to the east of the site within South are shown in the combined Landscape and Engineer Drainage plan. They are further shown in detail in the landscape rationale. The details have been modified according to the comments from SDCC Public Realm section in relation to the maintenance of the swales, the slopes shall be a minimum of 1:4 and not 1:3. These swales shall be grassed finish at the surface with a stone infiltration trench beneath. All details for proposed surface water swales to the east of the site within South are shown in the combined Landscape and Engineer Drainage plan. They are further shown in detail in the landscape rationale. The details have been modified according to the comments from SDCC Public Realm</p>
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<p>ensure maintenance can be carried out in the future.</p> <p>iv. Further detail is required on the gabion wall including a cross section. If the grass comes to the base of the wall a hardscape strip is required to enable maintenance.</p>	<p>(iv) section in relation to the maintenance of the swales, the slopes shall be a minimum of 1:4 and not 1:3.</p> <p>The gabion wall has been removed in its entirety. The landscape terraces have also been removed as both were requested by the Public realm section to be removed. It is felt that the space has been reduced in quality as a result of the removal of both the gabion and the terraces.</p>
<p>2. Street Trees</p> <p>There is a lack of street tree provision along the route leading to Blocks 2 and 3 and to the west of Block 4. The applicant is requested to submit a revised landscape plan to incorporate further street trees. SDCC require street trees every 5 car park spaces.</p>	<p>Response:</p> <p>The number of street trees have been provided in the boundary margin along the route leading to Blocks 2 and 3 and to the west of Block 4. A revised landscape plan has been developed to incorporate further street trees. The SDCC requirement for street trees every 5 car park spaces has been reviewed and where possible proposed. It must be noted that tree pits are proposed to support the individual trees. It must be noted that a further constraint of public lighting and the requirement for 5 – 7m distance from the base of tree to the location of the lighting column.</p>
<p>3. Play</p> <p>Play provision is insufficient and not detailed.</p>	<p>Response:</p> <p>The proposed play provision is extensive, ie instead of an isolated insular area for play, the entire open space is proposed for amenity for all age groups and users.</p>



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<p>We require details of play space proposals to be agreed with the Planning Authority. Play Proposals shall include accessible play features such as a basket swing, accessible roundabout or accessible trampoline. We also require natural play features. Details of play equipment, and safety surfacing, along with specifications and proof that all play equipment conforms to European Standards EN 1176-1-11 and EN 1177 Playground Equipment and Surfacing shall be submitted. Post installation certification by the Register of Play Inspectors International (RPII) will be a requirement. An indicative Play Map showing types and age groups catered for shall also be submitted.</p>	<p>Creating a wider and inclusive play space. Additional play items have been included and callisthenic items have been introduced. The play proposals have been identified on the plan and detailed in the Landscape Rationale. The play proposals shall also include natural play elements such as change of landform, rocks and tree trunks. They shall be complemented by slides and climbing elements. The use of basket swing and sunken trampoline may be used, however the respective safety zones require much space which may impact on the usage by other age groups. Details of play equipment, and safety surfacing, along with specifications and proof that all play equipment conforms to European Standards EN 1176-1-11 and EN 1177 Playground Equipment and Surfacing is detailed in the Rationale. Post installation certification by the Register of Play Inspectors International (RPII) shall be submitted post installation. An indicative Plan showing types of play items, Callisthenic equipment and age groups catered for, is included in the landscape rationale.</p>
<p><b>4. Tree Protection</b> Prior to the commencement of any permitted development, the developer shall engage the services of a Professional Member of Arboricultural Association who is an independent, qualified arborist, for the entire period of construction activity. The applicant shall inform the planning authority in writing of the appointment and name of the consultant, prior to commencement of development. The consultant shall visit the site at a minimum on a monthly basis, to ensure the implementation of all of the recommendations in the tree reports and plans.</p>	<p><b>Response:</b> Prior to the commencement of any permitted development, the developer shall engage the services of a Professional Member of Arboricultural Association who is an independent, qualified arborist, for the entire period of construction activity. The planning authority shall be informed in writing of the appointment and name of the arboricultural consultant, prior to commencement of development. The consultant shall visit the site at a minimum on a regular basis monthly if required, to ensure the implementation of all of the recommendations in the tree reports and plans. A pre condition survey shall carried out with photograph survey, this shall be followed by regular inspections with photographic evidence of same. A final survey post construction shall be carried out and a certificate for same shall be issued by the consulting arborist.</p>



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<p>5. Tree Bond and Arboricultural Agreement</p> <p>Prior to the commencement of any permitted development or any related construction activity or tree felling on the site, the applicant shall lodge a Tree and Hedgerow Bond to the value of which to be agreed with the Planning Authority Public Realm Section. This is to ensure the protection of trees on and immediately adjacent to the site to make good any damage caused during the construction period.</p>	<p>Response:</p> <p>The existing beech tree line on site is of poor quality, please see consulting arborist report, a tree and hedge bond would be premature. It would be necessary to review the existing tree line with the arborist and the local authority to determine the future and or recommendations for the upkeep and or replacement of same. The trees in the SDCC lands to the east of the site shall be not interfered with and shall be protected by tree protection according to the BS standard. The works on SDCC shall require consent from SDCC, it is proposed to liaise with the local authority in relation to works on their land, ie with their agreement.</p>
<p>6. Impacts on Biodiversity (Bats)</p> <p>The Bat mitigation measures contained with the Bat Assessment Report prepared by Brian Keeley shall be adhered to at all times during construction works and fully implemented.</p>	<p>Response.</p> <p>The Bat mitigation measures contained with the Bat Assessment Report prepared by Brian Keeley shall be adhered to at all times during construction works and fully implemented. 2 x number bat boxes shall be included in the proposal.</p>

We trust all items are in order and look forward to a successful application.

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Ronan MacDiarmada