

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
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**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING
REGULATIONS THEREUNDER**

Decision Order Number: 0139	Date of Decision: 02-Feb-2022
Register Reference: SD21A/0327	Registration Date: 30-Nov-2021

Applicant: Greenwalk Development Ltd.

Development: A residential development of 77 dwellings comprised of 63 two storey houses and 14 apartments & duplex units accommodated in one 3 storey building. The proposed houses are comprised of 8 two bed houses & 55 three bed houses; the proposed apartments & duplex units are comprised of 7 one bed apartments at ground floor & 7 three 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 and 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 approximately 455sq.m. all on a site area of 2.28Ha, at Gordon Park, Old Naas Road, Kingswood, Dublin 22 bounded to the west by the Old Nass Road, to the south by the Silken Park development and is located in the townland of Brownsbarn and

Location: Gordon Park, Old Naas Road, Kingswood, Dublin 22

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 30-Nov-2021 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. The principle of residential development at the site is not considered to be settled, having regard to the split zoning on the site, the apparent lack of local amenities in the local centre, the fact that it is not zoned 'RES-N', and the Specific Local Objective for the site.

The applicant is requested to provide an audit of community infrastructure and facilities in the area as described in the objective, to demonstrate how the development would not be premature pending the adoption of a Local Area Plan, and to demonstrate how the development of the site would provide for local services as detailed in Policies UC1, UC5, R1 and R8 and of the County Development Plan.

2. The proposal is located in close proximity to Casement Aerodrome. The contents of Section 11.6.6 (iii) of the County Development Plan are noted, under which development density and height can be limited, or restricted altogether. The site is under the inner approach surface of Casement Aerodrome and may be inside the 'extended public safety zone' though this is not clear. The applicant is requested to consider the same and comment in particular on how the development would comply with section 11.6.6 (iii) of the County Development Plan, in particular in relation to the headings 'Public Safety Zones' and 'Inner Approach Area'.

3. The proposal would see the existing vehicular access to the site relocated to the south-west corner of the site, as an at-grade connection would be impossible to the north-west corner, where the existing vehicular access is provided.

There are some notable problems with this approach:

- The proposal would appear to be in breach of Policy H16 Objectives 1 and 2 of the County Development Plan, which read:

Objective 1

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).

Objective 2

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.

- removal of mature trees at the south-west location to facilitate vehicular access;

- patchy streetscape at said access owing to its proximity with adjoining sites;

- It is noted that the Irish Water wayleave provides a natural location for vehicular access to the site from the north-west. Necessity to retain wayleave has provided for an unenclosed parking courtyard in the north-west corner of the site instead;

- The applicant proposes to retain the stone boundary wall to the west of the site, and a number of trees on the western boundary. It is unclear if this is consistent with the proposed raising of ground level by up to 1.5m immediately inside the site at these locations;

The proposed strategy is understood to be responding to the particular context and challenge of serving the proposed site. The applicant may wish to consider, alternatively, the use of a vacuum system to service the site without resorting to reprofiling of the site. The applicant should provide comment or consider revising the proposal.

4. (a) The residential development is considered to be slightly low in density in comparison to County

Development Plan standards and taking into account the relevant national guidance. The applicant is requested to justify the proposed density having regard to the County Development Plan and National Guidance.

(b) Pedestrian Connections

(i) The pedestrian connections to the south should be agreed with the adjoining management company and provided as part of the development – in particular, the south-east connection as proposed does not match the existing boundary gate connecting the development to the south with the rugby pitches. These spaces should link up and if possible the adjoining public open spaces should form a single larger space. The applicant should progress this issue and provide a response via additional information.

Note: It is noted that the development to the south is due to be taken in charge as per the details of that permission, but that open spaces will remain in the charge of an Owner's Management Company.

(ii) The proposed pedestrian connection to the south-west would be accessible via a parking court off the main street. It is considered that the street layout here could be considerably improved with the reorganisation of the adjoining block, through the provision of dormer bungalows with direct frontage onto the connection and siding onto the southern boundary, and wrap-around corner units, to provide continuous residential frontage onto the pedestrian route, ensure a street-like layout, and guarantee passive surveillance. The applicant should consider revising the layout at this location.

(c) Northern Street and Duplex Layout.

The communal amenity space for the proposed duplex block is adequately sized but inappropriately placed, presenting a long hedgerow boundary to a residential street. Similarly, the parking court to the north of the duplex block seems to be a left-over space which could be improved. The arrangement of the duplex block, communal amenity space, and parking court, should be reappraised and revised in order that the communal space can be enclosed without presenting a defensive boundary to the local street. The applicant is requested to provide on-street parking and a stronger building frontage.

5. The impact of the proposed development on the existing trees contained within the development site is not acceptable to the SDCC Public Realm Section, and would contravene policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 and other GI policies and objectives in the County Development Plan. The current proposal would have a negative impact on existing trees within the development site area. The proposed development will require the removal of 38 no. trees and a large section of existing hedgerow.

The applicant should provide a response which should include a revised layout to significantly reduce the impact of the proposed development on the existing mature trees, in particular addressing:

- (a) those trees located along the western boundary which are proposed to be removed.
- (b) The proposal provides for the removal of a number of mature trees and boundary hedgerows, particularly to the south-west of the site, which would erode the existing sense of privacy for adjoining residents. To facilitate a proposed row of houses to the south-west (units 16 to 23), it is proposed that a row of trees and hedgerow would need to be removed. These could be better retained in, for instance, communal or public amenity space. In combination with the general concern for loss of trees arising from the development, the applicant is requested to address potential alternatives at this location which would allow for the retention of these trees.

6. The applicant is requested to provide the following additional information as required by the SDCC Public Realm Department:

(a) Landscape Plan

(i) The applicant is requested to submit a plan which clearly delineating communal and private spaces should 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.

(ii) The applicant is requested to submit level details for the open space, this shall include cross section drawings where applicable. If retaining walls are required, they shall be located outside the open space.

(iii) Details of tree planting pits to include SUDs measures in urban tree pits

(iv) Detailed planting plan.

(b) Planting Proposals

Planting should be predominantly native and pollinator friendly where possible, street trees to be minimum 18-20cm girth and open space trees to be 20-25cm girth, specimen/feature trees should ideally be 30-35cm girth. Street trees where possible should contain SUDs features and be planted within the public realm. The applicant should have suitable tree pits that attenuate water within hard surface areas. The applicant should clearly outline how SuDS features within the tree pits will function. Details of constructed/bio retention tree pits to be used to be provided. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape. Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting schemes. Response should include revised layout and drawings.

(c) Children's Play

Additional play provision shall be provided for within the proposed development. An emphasis shall be on active, accessible play throughout the development. The applicant is requested to provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. The applicant shall provide further details in this regard.

7. The SDCC Public Realm Department has noted a number of concerns relating to the related issues of water attenuation, SUDs, and public open space. The applicant is requested to provide additional information to address the following points:
- (a) The issue of surface water attenuation is a significant concern for the Public Realm Section. All the proposed attenuation tanks are situated under areas identified as public open space; a large portion of the public open space areas are underlain by these tanks. This approach is not considered acceptable to the Public Realm Section. The proposal places severe limitations on the potential use and landscaping of the open space into the future. When the area of the attenuation tanks is taken from the public open space area provision then there is potentially a significant shortfall in terms of the open space provided and the standards contained in the South Dublin County Development Plan 2016-2022. The location of these tanks on the open space reduces both the amenity and usability of

the open space provided. Revised proposals with regard to the proposed location of the attenuation tanks within the open space areas to be provided by the applicant. Further consideration of the breakdown in provision of open space and the location and size of attenuation tanks needs to be carried out. Response should include revised layout and drawings.

(b) The applicant is requested to submit revised plans to include the following:

(i) Significantly reduce the impacts of the development on existing green infrastructure especially the mature boundary trees within the proposed development site

(ii) Demonstrate how natural SuDS features can be incorporated into the design of the proposed development

(iii) Green infrastructure proposals that will mitigate and compensate for the impact of the proposed development on the existing boundary trees. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds, construction/bioretention tree pits etc.) and planting for carbon sequestration and pollination to support the local Bat population. Response should include revised layout and drawings.

(c) A comprehensive SuDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation.

Additional natural SuDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits. In addition, the applicant is requested to provide the following:

(i) Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

(ii) Street Trees should be planted in public open space with suitable tree pits that incorporates SuDS features

(iii) Tree pit incorporating SUDS features should include a deep cellular water storage/attenuation area below the surface which acts as a soak away allowing surface water to infiltrate into the ground.

8. (a) Based on limited information provided the surface water attenuation of 984m³ is undersized by approximately 10%. The applicant is requested to submit a report showing revised details of different surface types such as buildings, permeable paving, green areas and their respective run off coefficients.

(b) The applicant is requested to submit a revised drawing showing the proposed surface water attenuation. Any additional attenuation required should be provided by means of SuDS (Sustainable Drainage). Examples of SuDS include, green roofs, permeable paving, filter drains, swales, green area detention basins, tree pits and other such SuDS.

(c) The applicant is requested to clarify and illustrate on a drawing if a petrol interceptor is proposed prior to entry of surface water to arched type proposed attenuation systems. A suitable sized petrol/oil interceptor should be proposed.

(d) Water Services of SDCC estimate that surface water discharge should be limited to 5.1 litres/second and not 6.5 litres/second as proposed on drawing number 21003-TJOC-ZZ-DR-C-0065. The applicant is requested to submit a report and drawing to explain this difference and adjust where necessary.

9. The applicant is requested to:
- (a) provide a Stage 1 & 2 Road Safety Audit of the completed design.
 - (b) revise the cycle parking provision to match those standards found in the 2020 Apartment guidelines, and to provide cycle parking around the public open space.
 - (c) consider improvements to the adjoining section of the Old Naas Road for the purposes of improving pedestrian and cycle access to infrastructure in the local centre.
10. The applicant has provided a letter from a childcare business in Citywest supporting the non-provision of childcare facilities on the site owing to the potential to undermine the viability of the existing facility. It is considered that a potential childcare facility would usually be expected in a large development and more details should be submitted regarding the capacity and no. of enrolments at the existing facility.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked "ADDITIONAL INFORMATION" and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD21A/0327

Date: 04-Feb-2022

Yours faithfully,


for **Senior Planner**