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**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING
REGULATIONS THEREUNDER**

Decision Order Number: 0154	Date of Decision: 04-Feb-2022
Register Reference: SDZ21A/0022	Registration Date: 02-Dec-2021

Applicant: Cairn Homes Properties Ltd.

Development: The construction of 569 dwellings, a creche, innovation hub and open space in the Clonburris South West Development Area of the Clonburris SDZ Planning Scheme 2019 as follows: 173 houses comprising 8 two bedroom houses, 153 three bedroom houses and 12 four bedroom houses (147 dwellings in CSW-S4 consisting of 8 two bedroom houses, 127 three bedroom houses & 12 four bedroom houses & 26 three bedroom dwellings in CSW-S3}, all 2 storey comprising semi-detached, terraced, end terrace units (with parking and private open space); (B) 148 duplex apartments/apartments {88 in CSW-S4 & 60 in CSW-S3} comprising 74 two bedroom units and 74 three bedroom units, in 16 three storey buildings. In CSW-S4 Duplex Blocks A,B,C,D,E,F,G,J,K, comprise 8 units (4 two bed & 4 three bed units), Duplex Block H comprises 16 units (8 two bed & 8 three bed units), In CSW-S3 Blocks L, N & O comprise 8 units (4 two bed & 4 three bed units), Block M comprises 14 units (7 two bed & 7 three bed units), Block P comprises 10 units (5 two bed & 5 three bed units), Block Q comprises 12 units {6 two bed & 6 three bed units), all to have terraces/pitched roof; (C) 396 apartments as follows: within CSW-S4, Block 1 consists of 172 apartments (76 one bedroom, 91 two bedroom and 5 three bedroom apartments), in a 2-building arrangement both 6 storeys in height. Within CSW-S3, Block 2 {4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments, Block 3 (4 storeys) comprises 16 one bedroom apartments and 22 two bedroom apartments (all apartments to have terrace or balcony); (D) Provision of an innovation hub (626sq.m) and creche (c. 547sq.m) in a part 3/4 storey 'local node' building in CSW-S4; (E) Vehicular access will be from the

permitted Clonburris Southern Link Street (SDZ20A/0021) and R113 to the east {along with provision of internal haul routes {for construction) to connect to the R136 to the west); (F) Public Open Space/landscaping of c. 4.1 hectares (to include Local Park and MUGA in CSW-S3, Grand Canal Park, along the southern and eastern boundaries of the site to connect to existing Grand Canal towpath) as well as a series of communal open spaces to serve apartments and duplex units (c. 0.39 ha); (G) all ancillary development works including footpaths, landscaping boundary treatments, public, private open space areas, car parking (656 spaces) and bicycle parking (672 spaces), single storey ESB substations/bike/bin stores, 'Gateway' entrance signage (2), solar panels at roof level of apartments, and all ancillary site development/construction works; (H) Permission is also sought for revisions to attenuation permitted under SDZ20A/0021 as well as connection to water supply, and provision of foul drainage infrastructure; this application is being made in accordance with the Clonburris Strategic Development Zone Planning Scheme 2019 and relates to a proposed development within the Clonburris Strategic Development Planning Scheme Area, as defined by Statutory Instrument No. 604 of 2015; an Environmental Impact Assessment Report accompanies this planning application; the application applies for 7-year planning permission for development at this site of c. 17 .02 hectares (on two parcels of land to include entrance area) within the townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin all on wider lands bounded generally by undeveloped lands and the Dublin-Cork railway line to the north, undeveloped lands and the Grand Canal to the south, the R113 {Fonthill Road) to the east and the R136 to the west.

Location: Within the Townlands of Cappagh, Clonburris Little & Kishoge, Co. Dublin
Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 02-Dec-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. Movement & Transport

(a) Street Network

Section 2.2.4 of the Scheme outlines that the centre line and alignment of the Local Streets and Homezones are flexible with the exception of streets with frontages prescribed under Section 3 (Development Areas). In this instance, the application site contains prescribed frontages in the form of Avenue Frontage, Canal Frontage and Park Frontage (Figure 3.1 refers). Concerns are raised in relation to the absence of a Local Street to the east of Block 2, fronting to the future Urban Square. This frontage is prescribed as a 'Avenue Frontage' in the Section 3 and as such the alignment of the Local Street is not flexible. The proposed development omits the street. In addition, it is considered

that the identified southern frontage for Block 1 is not delivered. This is an identified 'Park Frontage' and would provide passive surveillance and enclosure to the open space area to the south. The applicant is requested to consider the content of the Planning Scheme and amend the design to address these issues.

(b) Open Street Network and Vehicular Circulation

The Planning Scheme outlines that the alignment of the street network should largely have an orthogonal grid layout and shall largely comprise an open network in terms of permeability. Local Streets that provide through routes for strategic pedestrian and cyclist should be filtered to prioritise pedestrians and cyclists where junctions intersect with Link or Arterial Streets. The Planning Scheme provides an Overall Movement Concept in Figure 2.2.7 to demonstrate same. The Movement Concept of the Planning Scheme is integrated with the accompanying Transport Assessment and Transport Strategy. Having regard to the above, it is considered that the movement and street network proposed by the applicant is not consistent with the Planning Scheme in terms of an open permeability network and priority for cyclist and pedestrian movement at a selection of junctions of the link street and local streets.

The NTA has recommended removal of access junction to street 3, to promote walking and cycling. The other access and road layout should conform to the Movement Concept. The Roads Section outlines that a three-way junction at the south of Street 3 should be restored to allow the open flow of traffic around the development in accordance with the transport assessment and strategy that accompanies the Planning Scheme. The applicant is advised to review the NTA submission for further context. The applicant is requested to provide consistent material as part of further information.

(c) Increased Car Parking and set back on Link Street

The Southern Link Street runs through the centre of the site, having been approved under SD21A/0020. It should also be noted that Condition 4 of this permission requires agreement by compliance for a revised layout indicating that there is parallel parking the length of the Link Street. It is not apparent that this has been incorporated as part of this application. Clarity on this issue is required.

(c) Building Setback

Concerns are raised in relation to the set back of Block 1 from the Link Street. The set back may result in a wide feel to the entrance to the link street from the Fonthill Road. The submitted cross sections do not outline the building to building (likely building line of future development) width and demonstrate compliance with Figure 2.2.5 Example Link Street. Noted that this example indicates a building to building width range of 22m-30m and a set back privacy strip of less than 3m. It is not apparent that the current proposal meets this requirement and further information is, therefore requested.

(e) Bicycle Parking

The Roads report outlines that the bicycle parking explanation needs further detail. A detailed submission highlighting the allocation, quantity and location of the bicycle parking provision should be provided, to ensure the provision is in accordance with the Planning Scheme. The addition of electric bicycle charging facilities has been incorporated in the Clonburris SDZ requiring 10% of bicycle parking provision to provide for charging.

(f) Roads – Other

(i) The applicant is requested to provide details that indicate turning manoeuvres are achievable on all

roads unless short enough to allow reversing as per DMURS

(ii) Where links to future developments are left the applicant is requested to provide plans indicating that they are built right to the boundary. No ransom strips should be created.

(iii) An overall management plan of refuse collection for the apartments should be provided, detailing collection points and vehicle routes throughout the entire development.

2. Visual of Street

CGIs with accompanying cross sections of the different street types are required.

3. Built Form & Design

Street Design, Car Parking & Street Trees

(i) The Planning Authority has concerns about the level of perpendicular car parking on the local streets and the on curtilage parking in homezones. The applicant is requested to submit revised plans indicating revised details via further information. A cross section should also be provided.

(ii) Homezones (Intimate Local): In terms of design, the homezones have perpendicular parking and are not in accordance with the scheme. The applicant is requested to submit revised plans indicating revised details via additional information indicating a revised layout in accordance with figure 2.2.6. A cross section should also be provided.

(iii) Pedestrian Priority: A single pedestrian priority route is indicated in the scheme, to the south east corner (south of the proposed apartment block). There are a number of raised crossing points on this route but there is no indication given that the route is pedestrian priority. The applicant is requested to provide this street as pedestrian priority.

(iv) Carparking

Section 2.8.10 Design of Parking and Loading in the Planning Scheme provides for design criteria for the provision of car parking. The Scheme outlines that car parking should be carefully considered as part of the overall public realm. In the context of this site, the Scheme states that a mixture of on street parking for visitors and residents should be provided. The Scheme states ‘that a range of less formal or alternative parking arrangements may be used along Local Streets...’ and ‘This may include a mixture of on-street and in- curtilage parking, however, no more than 60% of residential parking spaces shall be provided as in-curtilage parking space in any Development Area. Parking within Home Zones/Intimate Local Streets shall be on- street.’ In this context, the Planning Authority has concerns in relation to the approach of the proposed development to car parking. It appears from the site layout plan and the taking in charge drawings that the majority of car parking is in-curtilage. The Scheme states that parking within Home Zones/ Intimate Local Streets shall be on- street. Further consideration of the approach to car parking is required by way of further information. This issue is interlinked with the design of the public realm. Noted that the Parking Strategy in the Transport Assessment and Strategy examined the spatial requirement for residential on-street parking, concluding that maximum parking standard provision could be met on-street with only a few areas requiring supplementary parking.

(v) Street Planting

The Planning Authority requires further information in relation to the provision of Street Planting. It is considered that the proposal for street planting do not meet the standards of the Planning Scheme and South Dublin County Council in terms of biodiversity, quantum, management and street trees.

- A revised proposal shall be consistent with Section 2.8.11 of the Scheme. The Planning Authority considers that the design of the local streets/ homezones requires a multi disciplinary reconsideration in relation to the street trees and car parking to ensure a high quality urban design taking account of the following:
 - The Parks report outlines that SDCC do not accept front garden trees or trees between driveways as street trees. Such trees cannot be taken in charge and maintained by the Council.
 - Parks note that street tree planting has been proposed on private curtilage and partly within the public footpath. This solution remains very problematic. The tree canopies and roots are still up to 50% on property not taken in charge by the Council which threatens the long term viability of the trees. The trees are also at risk from vehicles using the car parking spaces. The trees could be moved to the outside of the path shown on the drawing.
 - Revised proposal shall provide street trees to be provided fully in Public Areas and to be an integral part of the street rather than in front gardens. The applicant is referred to the Clonburris SDZ Planning Scheme 2019, Clonburris SDZ Parks and Landscape Strategy and DMURS (2013) for guidance on street tree provision and appropriate design layouts for local streets and homezones.
 - All Street Trees planted within the Public Realm shall have suitable tree pits that incorporates SuDS features.
 - Street Trees to be planted at:
 - o Minimum 18-20m girth along local streets
 - o Minimum 16-18cm girth on intimate local roads, i.e. homezones.
 - Street trees to incorporate SuDs Tree pits including sufficient growing medium.
 - The trees proposed for grass margins do not require SuDs tree pits, root deflectors, protection measures or tree grilles.
 - Proposed trees, configured to lie within the Public Realm, have been provided along some streets according to the requirements of Clonburris SDZ Planning Scheme and DMURS (2019), however several local streets and homezones lack street trees, estimated as:
 - (i) Street 1: Western Side, approx. 140m - no street trees
 - (ii) Street 2 Homezone North-South approx. 70m - no street trees
 - (iii) Street 3 approx. 80m - no street trees
 - (iv) Street 4 Homezone North-South; approx. 90m - no street trees
 - (v) Street 5 approx. 50m - no street trees; and a further 35m has no street trees on western side,
 - (vi) Street 6 Homezone North-South; approx. 60m - no street trees
 - (vii) Street 7 North-south approx. 60m - no street trees
 - (viii) Street 7 East-West approx. 310m has no street trees on northern side (local street and home zone)
 - (ix) Northernmost Street: No street trees for approx. 90m.
 - (x) Various Streets: street trees are provided at up to 8 perpendicular car parking spaces. The Clonburris SDZ requires street trees at least every 6 perpendicular car park spaces.

4. Local Node/Park Hub

- (a) The quantum of the childcare floorspace is below the stated minimum of 600sq.m and the applicant contends that the employment hub will serve a community employment function and also a commercial function and the combined floorspace of commercial/ community of 1,173sq.m meets the combined minimum of 800sq.m. The Planning Authority can see some merit in this rationale,

however, more details in relation to the operation and management of the employment hub are requested.

b). The Planning Authority has concerns in relation to the achievement of the Park Hub function at the Local Node. Table 2.7.2 of the Scheme outlines that the Park Hub community buildings be located adjacent to the main parks at the local nodes. The Cappagh Park Hub is to be a small scale community building to provide floorspace complementary to the adjacent Grand Canal Park and Boundary Park such as changing rooms and meeting rooms.

The Planning Authority considers that the Planning Scheme envisages a minimum community floorspace of 600 sqm at the Cappagh Local Node and envisages a community building, known as a Park Hub, to facilitate floorspace complementary to the adjacent Grand Canal Park and Boundary Park such as changing rooms and meeting rooms at the local node. Concerns remain regarding the absence of the community building element. Further consideration and discussion required with South Dublin County Council.

c). The Planning Scheme outlines that Local Landmark Buildings are permissible at key locations. The Local Node is identified as such a location in the Planning Scheme. The provision of a landmark building is not considered a requirement of the Planning Scheme, more an opportunity at key locations. The applicant states that the proposed local node is part 3/part 4 storeys which compares to the 3 adjacent 3 storeys of the duplex buildings and 2 storey houses and in compliance with achieving a local landmark. The Planning Authority considers that a landmark building is not proposed as part of the subject application as landmark buildings should be designed in a manner that is distinctive from surrounding buildings both in terms of architectural treatment and use of materials. The Planning Authority are concerned that the absence of any appropriately design landmark building is a missed opportunity to contribute to placemaking and legibility. In the context of the additional items above, the applicant is requested to consider additional height and landmark qualities for the Local Node.

5. Design.

(i) The applicant is requested to set out how the proposal meets the overarching objectives in terms of design (Section 2.8). These are:

- To ensure that development is designed in accordance with best practice and promotes identity and diversity between Development Areas;
- To ensure that development is laid out in a series of blocks and plots that are legible, permeable and human in scale with appropriate topography responses, building heights, street widths, urban grain and street frontages;
- To design streets using a more integrated approach to pedestrian, cyclist and vehicular movement and ensure that the movement function of each street is reflected by an appropriate design response and design speed.

At present, the Planning Authority is of the opinion that the applicant has not fully demonstrated a promotion of an identity / diversity in this location, Further detail required in some areas. There is little variation in FFL, the existing layout plan indicates a topography that could have been used to create variety and Further detail required in some areas.

(ii) The Planning Authority remains concerned regarding the E/W aligned pedestrian walkway to the south of the Link Street. Quantum of blank rear boundary walls to rear of duplex, coupled with the bike, bin store and ESB, which blocks views and passive surveillance and taken in conjunction with house type F2s is concerning for the urban design quality. The applicant is requested to amend the design to address this issue and provide a series of CGIs/photomontages for the area at various point, including communal open spaces, narrower points and the car parking.

(iii) Visual impact.

The Planning Authority is concerned regarding the impact of the materials and the creation of a sense of place. It is not evident that the materials are suitable from the photomontages provided. View 4 shows no landmark or variety of height. The applicant is requested to address this matter.

(iv) Block Form.

All perimeter blocks shall be designed according to the following principles (Section 2.8.3). The below sets out principles with the Planning Authority's Concerns:

- Building massing to the perimeter of the block; buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme.
- Building frontage to all sides, including the shorter sides (secondary street frontage) of the block; buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme.
- Proper design and attention to corners, avoiding dead or windowless gables; buildings do not turn corners, in accordance with 2.8.1 / 2.8.2 of the scheme. Additional information. Noted that dual frontage provided however these could be strengthen with additional windows.
- A continuity of building frontage, which relates to the local or urban context, and avoidance of blank walls; E/W pedestrian link to the rear of duplexes does not fully achieve this. Noted that dwelling that cited as being dual frontage are not and do provide habitable rooms overlooking. (e.g. dwg 19022 PL 105 and 19014 PL 112). Where there is a gable end facing onto public realm, walkways, they should be redesigned to provide active frontage. The house design for J3 is strong and this should be mimicked across the development.
- An appropriate scale of buildings to provide the appropriate level of enclosure of the streets and spaces; there are concerns regarding building height in some locations and also passive surveillance. There should be more variety in building height and roof level, to add visual interest.
- Adequate back-to-back distances within the block; detail not provided on layout plan
- Appropriate building set-backs from the street in line with the use of ground floors; detail not provided on layout plan
- Adequate arrangements for car parking and access around, within or below the block; Parking arrangement not in accordance with scheme

The applicant is requested to address Planning Authority's concerns above.

(v) Urban Grain and Façade Treatment

Figure 2.8.5 of the Planning Scheme provides for a fine urban grain at two locations fronting on the canal. The applicant has proposed a House Type H, a narrow gable fronted typology. The Planning Scheme states that each plot along the canal frontage (fine urban grain locations) shall be capable of development independently of tother buildings/ plots within each block with own door access to dwellings. The approach of the 2 storey gable fronted dwellings are consistent with Section 2.8.4 of the Scheme, however, it is considered that the fine urban grain provides an opportunity for greater diversity and architectural interest. The applicant shall be requested to consider further alternatives, including different designs between the two locations and further divergence from the adjacent corner

house types. Noted that the Building Height concept envisaged a 3-4 storey height at this location.

(vi) Gradients

19014 PL200 indicates a change in topography at ground level and this should be replicated at roof level and this would create a higher quality design. The applicant is requested to consider this across the entire site.

(vii) Street Interface and Building Setback

a. No own door access have been provided for apartment blocks 1, 2 or 3. The applicant is requested to address this.

b. The applicant should provide a layout plan indicating that distances between entrances is in accordance with Table 2.8.1

c. Development across the SDZ lands should present strong building frontages close to street edges. Setbacks from the street edge should therefore be minimised and on-street parking should be incorporated in line with the requirements of DMURS (2013), the street typologies illustrated under this Planning Scheme (Section 2.2 – Transport & Movement) and the requirements set out under Section 2.8.10 in relation to the design of parking and loading. It is not apparent that the current proposal meets this requirement and additional information is, therefore requested.

Where dwellings front the street edge, privacy strips/short gardens that range from 1 to 3 metres in depth should be considered particularly along Local Streets and Link Streets. Most are 1m and there is no variety. The applicant is requested to provide more variety. Buildings should not be set back from the street or space where commercial uses are proposed at ground floor

In curtilage parking should only be utilised along Local Streets in low density areas with front garden/driveway depths minimised to retain the required building height to street width ratios (see Section 2.8.6). It is not considered that the parking arrangement is acceptable at present.

(viii) Roofscape

A variety of roofscapes are encouraged to contribute to the architectural and visual diversity of the SDZ Lands. the application fails to recognise changes in levels and create an interesting visual impact. The applicant is requested to address this.

(viii) Privacy and Overlooking

The applicant is requested to indicate separation distances on the proposed layout plan. This should be provided via additional information. Balconies for proposed apartments should also be indicated.

(viii) Sunlight and Daylight

The Planning Authority note the deficiencies in these areas. The minimum private amenity space for each apartment should be increased in order to mitigate deficits. Communal open space should also be more functional. The applicant is requested to provide revised details in accordance with this.

6. SuDS

The applicant states that the subject application design complies with the site design requirements and objectives in the agreed Surface Water Management Plan as the development cells include the provision for at least two separate SuDS features and provides for swales for roads run off and permeable paving in private car parking areas. The Planning Authority notes the incorporation of SuDS features but also notes the concerns expressed by the Parks and Water Services Department. It appears that the scale of the proposed SuDS measures within the development cell is insufficient.

(i) There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development.

Although permeable paving in parking bays; limited swales, a filter drain; and two detention basins have been provided. Further natural SuDS measures are required to deliver a treatment train for improving water quality and utilising water to maximise amenity and biodiversity to comply with the Clonburris SDZ planning scheme. Water needs to be attenuated in more localised SuDS features.

(ii) Where detention basins have underground tanks, water should be directed to the detention basin to allow it to fill first with the 1 in 100 year storm allowing the underground tank to fill. Detention basins should have a low flow channel and a sloped face.

(iii) There appears to be a conflict between the number of swales shown in the drainage proposals and those shown on the landscape drawings. SuDS proposals should be consistent and all SuDS features included in attenuation calculations.

(iv) Further localised SuDS measures shall create an above ground treatment train and include:

(a) bioretention tree pits, green roofs on apartment buildings, further swales, disconnected downpipes, rain gardens, channel rills, ponds, wetlands etc.

(b) Swales to be planted with native and pollinator perennial riparian wildflowers using local species. Full species lists for the SDZ can be found in Ecological Survey of Clonburris (FERS Ltd., 2018).

(c) Details on how the SuDS elements function.

(d) Drainage and Landscape proposals to be consistent regarding SuDS provision.

(e) Inclusion of all above ground SUDS features in attenuation calculation (avoid underground systems).

(f) Detention basins to have deeper areas that fill first before being directed underground. Detention basins should have a low flow channel and a sloped face. The base of detention ponds should not be flat, they should include some lower areas to ensure that some areas only remain mucky, and the vast majority of the base of the detention pond can dry out cleanly. Where detention basins have underground tanks, the water should be directed to the detention basin first, followed by the underground tank being allowed to fill for the 1 in 100 year storm.

(g) Paths in Public Open Spaces used to attenuate water to be a permeable solid surface rather than compacted gravel.

(v) The location, type and size of all SuDS features shall be shown in a revised site layout drawing with a separate report to show what capacity in m³ each SuDS feature has. Examples of SuDS include and not limited to:

- Rain gardens,
- Green roofs
- Channel rills
- Tree pits
- Swales
- Planter boxes, water butts
- Other such Suds.

7. Green Infrastructure

(a) Street tree provision is inadequate: there are large sections of streets without trees in the Public Realm. More effort is needed to create strong green infrastructure links throughout the development. This is best achieved through additional street trees and SuDS to create these connections.

(b) Greater efforts are required integrate, retain and enhance existing hedgerows into the local green space/infrastructure and local parks.

(c) The submitted designs fail to maintain interconnectivity between the Grand Canal Corridor, urban streets, public parks and open spaces, and the Railway Corridor.

The current proposal has not availed of the opportunity to build upon the existing green infrastructure links on this site, and thereby falls short in the delivery of a resilient development with a distinctive identity.

Where green infrastructure links are not possible to retain, it is a key objective of the planning scheme to incorporate new biodiversity opportunities into the developments. While this is not a 'like-for-like' compensatory measure, benefits can be achieved by creating new and appropriate habitats and the inclusion of a variety of different SuDs measures, including green roofs.

8. Open Space Design

Grand Canal Park:

(i) It is unclear from the plans whether the proposed native hedgerow would be sufficient to protect the existing native hedgerow from damage from users. Further measures (defensive planting; native hedging, chestnut paling) should be proposed where required in localised areas to prevent damage to existing vegetation by users of the Park and to prevent desire lines or paths forming through this sensitive area.

(ii) The canal overflow stream is an important habitat for freshwater crayfish that enter and exit the canal through this channel. The prevention of disturbance to the existing sensitive habitat conditions is critical to maintaining the health of this population. The applicant is therefore requested to revise the landscape design for the interface area at the northern edge of the canal overflow stream, demonstrating how inadvertent disturbance of this sensitive habitat will be achieved.

(iii) The applicant is also requested to remove the suggested locations on site layout plans/ landscaping plans for two possible future secondary linkages to the canal towpath unless agreed in a finalised PLS. The proposal should retain the proposals for the crossing of the overflow channel at the existing Fonthill Road end and at a location to link with Omer Lock House. Any potential additional permeability can be considered post occupation of the area, as required.

(iv) The applicant is requested to provide details of the crossing point of the canal overflow and detail if any works are required.

Local Park:

(i) Requires appropriate boundary fencing, planting, a lockable vehicular access for maintenance and a separate entrance for pedestrians. A line of removable bollards is not an adequate entrance.

All Public Open Space:

(i) Parks require a greater retention of existing trees and hedgerows within the pNHA, parks and public open space as required by the Clonburris SDZ Planning Scheme (2019) and Clonburris SDZ Parks and Landscape Strategy.

(ii) The use of compacted gravel is not suitable in Public Open Spaces use to attenuate water. We require paths to be a permeable solid surface.

(iii) Park Boundaries to have appropriate boundaries to a standard suitable for Public Realm, with entrances for vehicular access and separate entrances for pedestrians.

Other Detail

The applicant is requested to provide further details of the following matters:

- The applicant is requested to provide details of plot width for houses and duplexes
- There are a number of areas where bins are located at communal open spaces and do not benefit

from passive surveillance the applicant is requested to address this. The applicant is also requested to provide details of the impact of bin / cycle stores on open space but providing cross sections and details of materials.

- Overlooking of the open space to the south east
- Interface with Lock House.

9. Part V

It is noted that the proposed Part V units include 56 duplexes. It is the preference of the Housing Department to have a mix of unit types and sizes more in proportion with the overall schedule of accommodation for the scheme and to include a specially adapted unit, suitable for persons with medical needs.

10. Foul Water

Foul sewers such as 450mm diameter foul sewer South of Southern Link Road at eastern end of site are too close to proposed buildings. The applicant is requested to contact diversion@water.ie Irish Water to agree the setback distance to all proposed foul sewers for the proposed development.

11. PLS & BMP

It is noted that the Parks and Landscape Strategy and the Biodiversity Management Plan at draft stage. As part of the response to the further information, the applicant is requested to review the final PLS and BMP and demonstrate compliance with each document.

12. Net Development Area

The applicant is requested to overlay the proposed net development area proposed with Figure 2.13.3 in the Planning Scheme. It is noted that the Planning Scheme outlines that some slight plot adjustment for each Sub Sector may be acceptable provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any Sub Sector; would not significantly affect the gross or net development area of any Sub Sector.

It is considered that the applicant has not fully demonstrated that the net development area of the CSW-S4 and the CSW- S3 (partial) is in accordance with the Planning Scheme.

13. Future Retail /Retail Services Opportunity

The Planning Authority accepts the rationale for not providing retail at this location at this time due to the proximity of the subject site to a future urban centre. The Planning Authority notes that the Planning Scheme has the provision of minimum retail convenience floorspace in Phase 1B and substantial primary retail frontage. Figure 2.5.1 provides a function map for the Planning Scheme and indicates a secondary retail frontage at and adjacent to the Local Node. The applicant is requested to demonstrate that the residential ground floor design at the location of the retail frontage has flexibility to change to a retail / non residential uses in the future. Amendments to the design of the subject units is requested.

14. Lighting.

The Clonburris SDZ Planning Scheme requires lighting throughout the SDZ to be at a low level, directional and should follow guidance provided by Bat Conservation Trust (2018) Guidance note 08/18 Bats and artificial lighting in the UK. The Grand Canal pNHA buffer zone is a national ecological route and the applicant must demonstrate sensitivity to bats. It is Public Realm's preference that open spaces would not be lit unless it can be demonstrated that a specific need such as active travel use exists. In the context of a finalised Biodiversity Management Plan, the applicant is requested to resubmit the public lighting plan showing compliance with the Planning Scheme and BMP. Where possible, lighting zones shall be integrated onto Landscaping and site layout plans.

15. EIAR

Further information is required relating to a number of matters that may impact the EIAR. As such, where relevant an update to the EIAR should be provided via additional information

16. Environmental Health

An Acoustic Design Statement as part of a good acoustic design process must be submitted in order to demonstrate how the potential of a significant adverse noise impact will be avoided in the finished development from traffic noise and Dublin – Cork railway line noise. The statement should outline in detail the mitigation measures and specification of glazing and other design features to be used in order to reduce the impact of excessive noise on residents of the finished development.

17. Landscape Plan

A revised detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of Council's Public Realm Section. The revised landscape plan shall integrate tree planting and SuDS drainage to provide strong green infrastructure links throughout the development in accordance with Clonburris SDZ Planning Scheme and Parks and Landscape Strategy.

The proposed ornamental shrub planting within Canal Park and Streets/Public Realm; and the proposed ornamental grass planting within the swales would require labour intensive maintenance and therefore are not suitable for Taking in Charge by South Dublin County Council. SDCC can take in charge Trees, hedgerow, grass, wildflower and bulb areas. Plant species to be predominantly native and/or pollinator friendly.

The revised Landscape Plan should incorporate:

- (i) Street trees that are in line with the requirements set out in the Clonburris Strategic Development Zone Planning Scheme (Clonburris SDZ) 2019' and the 'Design Manual for Roads and Streets (DMURS) 2019. Street tree provision to incorporate small scale SuDS features that enhance biodiversity, provide amenity, manage surface water volume while providing water quality treatment.
- (ii) Details of street tree planting to be submitted to the Public Realm Section of SDCC for agreement. Urban tree pits to include SUDs measures.
- (iii) Street trees Size at planting a minimum of 18 to 20-centimetre girth (cmg) within local streets and a minimum of 16 -18 cmg on intimate local streets (homezones) as per the requirements of the Clonburris SDZ Parks and Landscape Strategy. The developer shall submit cross section details of the

tree pits and growing mediums. The tree pits shall include storm water attenuation.

(iv) Retained, removed and compensatory hedgerow to be clearly identified on Landscape Plans.

(v) Parkland/Open Space tree planting to include a range of semi-mature specimens that are a minimum of 20-25cmg and specimen ornamental trees to include trees that are 30-35 cmg.

(vi) Details of all natural SuDS features including further swales, rain gardens, bioretention tree pits, channel rills, filter strips, ponds, detention basins with lower areas allowed to fill first (low flow channels), wetlands etc

(vii) Landscape masterplan/planting plan to clearly delineate street lighting to ensure street tree proposals are realistic. If this is not currently the case, proposals to be revised to ensure street tree delivery.

(viii) Tree and hedgerow protection measures: show extent and position of tree and hedgerow protection fences including protection of all vegetation within the 30m pNHA buffer zone.

(ix) Tree Impact Plan: an updated tree impact plan is required reflect the latest landscape and tree retention proposals, maximising tree and hedgerow within parks and open spaces, particularly the pNHA.

(x) Implementation timetables.

(xi) Grassed areas and slopes need to provide for safe grass cutting (generally 1 in 8 slope, max 1 in 6) with ride on lawn mowers or tractor with a 16 foot mower pulled behind.

(xii) Detailed proposals for the future maintenance/management of all landscaped areas.

(xiii) Lockable (preferably automated) vehicular access to local parks and that maintenance vehicular access is possible where required throughout the park area.

(xiv) Full entrance details for pedestrians and cyclists that minimise the need for removable bollards, a line of removable bollards is not an adequate entrance. Where removable bollards are proposed we recommend an extra socket be provided for temporary displacement.

(xv) Northwest Local Park boundary to have railing suitable to public realm, i.e. a low wall with heavy duty round bar, minimum 16mm diameter galvanised and powder coated matt black metal railing, 1.8m high, suitable for public realm.

(xvi) Boundary details and planting to be to taking in charge standard and to be agreed with SDCC Public Realm.

(xvii) Commit to ensuring further measures (defensive planting; native hedging, chestnut paling) are implemented to protect existing vegetation within the pNHA, i.e. at the interface between wilder area of Canal Park and parkland.

(xviii) All areas proposed for taking in charge shall be to a taking in charge standard that ensures ease of maintenance including ease of access. Soft landscape areas intended for taking in charge should predominantly consist of grass, hedges, trees, woodland planting, meadowland or bulb planted areas using predominantly native and/or pollinator friendly species and comply with the requirements of the Clonburris SDZ Biodiversity Management Plan. Trees to be grouped appropriately to enable access to meadowlands for cutting.

(a) avoid use of ornamental ground cover or ground cover or treatments that need intensive maintenance or herbicide use e.g. For ornamental planting proposed within the Local Park on Drawing No. 1738_PL_P_06 Landscape Site Plan 03 is not suitable for taking in charge.

(b) extensive areas of herbaceous perennial ground cover should also be avoided.

(c) minimise the use of shrubs that require regular maintenance

(d) the exception to the planting criteria above are the planted swales required for SuDS where

riparian planting is required. Swales to be planted with wildflowers.

(xix) Open space shrub planting within Canal Park to be native and include pollinator friendly species. Suitable species include hazel *Corylus avellana*, wild privet *Ligustrum vulgare*, guelder rose *Viburnum opulus* and yew *Taxus baccata*.

(xx) Native species should be used for formal hedging proposed within Clonburris SDZ e.g. residential. Suitable species include hazel *Corylus avellana*, wild privet *Ligustrum vulgare*, guelder rose *Viburnum opulus* and yew *Taxus baccata*. *P Lusitanica* is not appropriate.

(xxi) Woodland planting should use the Miyawaki technique (3-5/m²) in order to establish quickly and reduce maintenance costs. This will require an establishment period and maintenance of 5 years for newly planted woodland areas prior to taking in charge.

(xxii) Paths to be a permeable solid surface. Extensive use of gravel should be avoided as, at present, it increases maintenance requirements and the potential use of herbicides, alternative surfaces are preferred unless the areas will be heavily trafficked. Loose or bound gravel should be judiciously used.

(xxiii) All playspace surfacing to be engineered woodchip surfacing.

(xxiv) Any sand play areas to be enclosed with fencing.

(xxv) Details of all play items and natural play features to be provided and agreed with SDCC Public Realm Section.

(xxvi) The relevant requirements of the Clonburris Parks and Landscape Strategy.

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: SDZ21A/0022

Date: 08-Feb-2022

Yours faithfully,


for **Senior Planner**