

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: 0230	Date of Decision: 22-Feb-2022
Register Reference: SDZ21A/0023	Registration Date: 20-Dec-2021

Applicant: Hugh McGreevy & Sons Ltd.

Development: 455 residential units (including a mixture of 2 and 3 storey semi-detached and terraced houses, and duplex units and apartments in 3 and 4 storey blocks), new internal roads and footpaths, site access, public open space, car parking, cycle stores, landscaping, bin stores, foul and surface water drainage, boundary walls and fences, ESB substations and all associated site development works. Private and semi-private open space to serve the proposed units will be provided in the form of balconies, terraces and gardens; including revisions to the permitted / under construction Celbridge Link Road (part of Loop Road 3), permitted under Reg. Ref SDZ17Af0009, associated with the provision of access to the development, parallel parking bays, and public lighting; 58 two bed, two storey, terraced houses (Type E1, E2, E3, J1 & J2); 6 three bed, two storey, semi-detached houses (Type 11); 190 three bed, two storey, terraced houses (Type A 1, A2, A3, B1, 82, C1, C2, C3, D1, D2, F1, F2, 11 & 12); 5 three bed, three storey, terraced houses (Type H); 6 four bed, two storey, terraced houses (Type K1, K2); 7 apartment Blocks (Blocks B, D, E, G, H, I & K) containing 111 apartments/duplexes including 32 one bed apartments, 22 two bed and 57 three bed duplex apartments over 3 storeys; 4 apartment Blocks (Blocks A, C, J & L) containing 37 apartments/duplexes including 8 no. one bed apartments, 29 three bed duplex apartments over 4 storeys; 1 apartment Block (Block F) containing 42 apartments including 2 one bed apartments and 40 two bed apartments over 4 storeys on a site located to the south of Tubber Lane, in the north-west of the Adamstown SDZ lands and to the west and south-west of the permitted/under construction Tubber Lane Phase 2 development (Reg. Ref: SDZ19Af0008, as amended under Reg. Ref: SDZ20Af0014).

Location: Tubber Lane, Adamstown, Lucan, Co. Dublin.

Application Type: SDZ Application

Dear Sir /Madam,

With reference to your planning application, received on 20-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. It is South Dublin County Councils preference to acquire a mixture of units on site in line with the ratio of units proposed in the development to include 4 universal type units to accommodate persons with medical needs. The applicant is requested to make contact with the Housing Department in this regard.
2. 1. Design
The applicant is requested to submit:
(A) a layout plan clearly indicating heights across the site.
(B) a revised design statement, setting out details of materials and finishes.
(C) a quality housing assessment which should include all relevant floor areas and an indication of aspect for the proposed apartments.

2. Height and Linkages

The proposed development is generally compliant with the scheme in terms of height, given the realignment of the Celbridge Link Road. However, the proposed development would benefit from a variety of heights along the linear park, particularly to the north and at access points. The applicant is requested to connect to the development to the east based upon the permitted layout plan for (SDZ21A/0003) and to punctuate connection points with a greater variety in housing, increasing heights to 2.5 / 3 storeys to assist wayfinding. The applicant is requested to take the approved development to the east under SDZ21A/0003 into consideration. In particular, consideration should be given to the approved linear green space and links through this to the adjacent development. The applicant is also requested to demonstrate that an appropriate depth of linear park has been provided in accordance with the scheme.

3. Apartments

The applicant is requested to address the following regarding apartment and duplex blocks
Blocks A and C: the linear area to the east of Block A would benefit from further activation. It is noted from the floorplans that the majority of windows on the east elevation would serve bedrooms and there is little opportunity for passive surveillance, with the exception of the top floor balconies. This elevation should be activated, with the possible inclusion of an entrance / improved design. Any amendments should be reflected on the side elevation of Block C, fronting Celbridge Link Road, which is also a wayfinding structure.

Block G: The applicant is requested to reconsider the layout of these units and whether it is possible

to give the ground floor units own door access to the rear, rather than the front, to activate the area along the linear park.

Block H: The applicant is requested to consider more variation in ground floor access points.

Block I: The applicant is requested to provide rear elevations. There is an area of communal open space to the rear and the proposal would benefit from dual frontage at this location to address the communal open space.

Block K: Block K is 3 storey and is stepped in at part at top level for balconies - some elements extend to the forward of the front and rear elevations. The proposal appears somewhat monolithic and would benefit from breaking up the massing more, such as what has been achieved with Block B.

Blocks J and L: The southern side elevation of Block J and northern side elevation of Block L would benefit from a redesign to make it more of a landmark / wayfinding structure (similar to the northern elevation of Block A and the southern elevation of Block C).

4. Communal amenity

(A) The applicant is requested to provide a breakdown of the communal amenity space and how it accords with the apartment guidelines.

(B) The applicant should note that the Planning Authority has concerns regarding the functionality of some of the areas of open space identified.

Block F: Area to the west appears to consist of trees, bin stores and plant, with no room for amenity space. Area to the east contains a bike store and trees, with no room for amenity space.

Block G and H: The area between these two blocks again seems incidental with no connection to the wider open space network.

Block L: The area identified is a thin strip which is unlikely to provide any amenity.

East of the Celbridge Link Road: There does not appear to be any communal amenity space in this location.

The applicant is requested to provide revised plans, indicating usable, well connected and functional open spaces.

5. Bin and cycle storage

Generally, the bin and cycle storage location are situated away from the main open spaces, however, they still benefit from overlooking. To the north of the scheme, the bike and bin stores are close to unit 449. The applicant is requested to revise this area or provide a section indicating the impact on the adjacent properties. The bin and bike stores for Blocks A, B and C are in a prominent location and the applicant is requested to consider the design of these elements further - e.g. greening the structure or redesigning. The bin and bike stores for units C and E are also in a prominent location. The applicant is requested to consider screening for the bin stores at Blocks F, G / H and I. It is not apparent that the bin and cycle storage has been included on the sections. The applicant is requested to address these matters.

6. Daylight, Sunlight and Shadow

The applicant has not provided an assessment of daylight, sunlight and shadow. Apartments are proposed and the impacts of these should be demonstrated. The applicant is requested to address this.

7. House Types

The applicant is requested to address the following:

A1, C1, D1, E3, J1 - Passive surveillance should be increased. Dual frontage should be considered. Dwelling should 'turn corner' and be elongated alongside elevation

F1 - Layout plan indicates that these are end terrace. Plan PH013 states they are mid terrace. No side elevation provided. Floorplans indicate an elongated side elevation that 'turns corner', however, there are no windows indicated on floorplans.

H1, I1 - Passive surveillance should be increased where separation distances from other dwellings allow. Dual frontage should be considered

K1 - consideration should be given to activating the northern side elevation of K1.

8. Boundary Treatments

The proposed development would provide long sections of boundary treatments with blank facades in some instances. This is seen on section 1. It is noted that the sections are generally along the Avenues, with the exception of Section 1, which enters one of the secondary streets. The Planning Authority has detailed a number of units that would benefit from dual frontages. The provision of dual frontage would reduce the impact of the boundary treatments in these areas. The applicant is requested to provide revised sections of the smaller streets

9. Parking

It is noted that some perpendicular parking associated with the secondary streets is visible from the avenues - the applicant is requested to redesign these areas.

10. Street hierarchy

(A) It is noted that the hedge to the west has been punctuated by a street, which is not in compliance with the scheme. The lands to the west are zoned 'RU' and outused the SDZ. Therefore, there is no need to ensure connectivity to these lands at this stage by impacting on hedgerows. The applicant is requested to remove the link through the hedge to the 'RU' lands.

(B) It is noted that not all elements of the Avenues are in keeping with this design and the applicant is requested to provide a revised layout indicating that all elements of the Avenues provide parking, trees, footpaths and cycle paths in line with the ASDG

(C) The applicant is requested to provide a road layout plan clearly indicating street typologies. Each type of street should meet the relevant design requirements in terms of parking, pedestrian / cycle movement, crossings and street trees. Cross sections for each road type should ensure correct spacing for cycle lanes and parallel and perpendicular parking should be provided.

3. Roads.

The applicant is requested to:

(1) submit a colour coded plan of the vehicle parking and bicycle parking across the development, to ensure compliance with the SDZ.

(2) confirm the cycle/pedestrian link on to Tubber lane in the north.

(3) The pedestrian access in the northwest corner from Tubber Lane is not clear, it appears that this would be an access over the existing ditch and it continue to along the western edge. The applicant is

requested to provide further details of this area. Having regard to house typology and protection of hedgerow, the need and rationale for same shall be submitted.

(4) The footpath between dwellings 356 and 390 should link to surrounding footpaths, if the road is to be a shared surface it should be identified.

(5) The applicant is requested to ensure that turning manoeuvres are achievable on all roads unless short enough to allow reversing as per DMURS.

(6) The details of access roads and crossing points should be submitted showing dimensions of corner radii, road widths etc.

(7) Where links to future developments are left the applicant shall insure that they are built right to the boundary. No ransom strips should be created. This does not apply to adjacent lands zoned 'RU'.

(8) The applicant is requested to provide an overall management plan of refuse collection for the apartments, detailing collection points and vehicle routes throughout the entire development. A revised layout of not less than 1:100 scale, showing a swept path analysis drawing (i.e. Autotrack or similar) is requested detailing turning movements and routes of refuse vehicles and fire tenders throughout the development.

(9) The applicant is requested to provide a statement on the quantity of bicycle parking provided at the development, to ensure the amount is consistent with the apartment guidelines.

(10) The applicant is requested to submit a clearer car parking provision calculation. The revised calculation shall, include:

(a) 5% of the overall provision to be allocated for mobility impaired users,

(b) 10% of the total provision to be equipped with electrical charging points.

(c) And ensure no more than 60% private on curtilage parking spaces have been provided.

(d) Taking in Charge:

(11) A taking in charge drawing has been submitted detailing the areas for public care. All the parking spaces and apartment areas are to be maintained by management company. The submitted map highlights the areas for Taking in Charge in green. However, some footpath links are not to be offered for Taking in Charge, the applicant is requested to address this.

(12) The applicant is requested to provide a construction management plan.

4. Parks

(1) Impact on existing trees, hedgerows and local biodiversity:

(a) Location of Site Compound NE: The proposed site compound at the northeast of the site is too close to the existing hedgerow which is to be retained (poga Construction, Waste and Environmental Management Plan Ref 20065_CMP/CWEMP_R2 December 2021 Appendix A, Site Plan)

(b) Location of Site Compound SW: The proposed site compound at the southwest of the site shows an entrance through hedgerow and badger protected area. (poga Construction, Waste and Environmental Management Plan Ref 20065_CMP/CWEMP_R2 December 2021, Appendix A, Site Plan)

The applicant is requested to move the site compounds away from these areas as they are too close to the existing hedgerows. Refer poga Construction, Waste and Environmental Management Plan Ref 20065_CMP/CWEMP_R2 December 2021 Appendix A Site Plan for proposed compound locations.

(c) Public Lighting: Public lighting is shown next to hedgerows (refer McElligott Phase 3 Public Lighting Layout Dwg No E013-016). Public lighting must be kept on the opposite side of roads to retained hedgerows. Hedgerows should be retained as dark corridors and should not be lit. This is a

recommendation of the Ecological Impact Assessment (EcIA) (Faith Wilson, 15th December 2021) (page 30 Item 10 and 13), i.e. 'any lighting used in the development should not overspill onto the adjoining trees and woodland thereby ensuring that a dark corridor for foraging and commuting bats and movement for other wildlife is maintained' and 'ensure that there is no light spill from the proposed development onto the retained areas of linear vegetation and boundary features'. Open Spaces should not be lit. the applicant is requested to address this and consider omitting pedestrian walkway adjacent to the western boundary hedgerow that forms the edge of the SDZ.

(d) Access roads through hedgerows proposed for retention

The layout drawings and Landscape Rationale (RMDA, Dec 2021, P. 20) show access points through hedgerows along the rural western boundary which are to be retained. These access routes through hedgerows should be removed to protect the ecological value of the hedgerow. Noted that the lands to the west are zoned RU and no strategic connections are required. Any connections must be shown as potential future link and demonstrated that no impact on hedgerow is proposed.

(e) Removal of boundary hedgerow in northwest corner (Hedge No. 2) regarded as a key green infrastructural connection. The removal of boundary hedgerow at this location to facilitate one house and a cycle path that is not required is contrary to sustainable development and SDCC Green Infrastructure Policies and Objectives. The applicant is requested to address this. It is considered that the cycle track should be omitted.

(f) Impact on Bats

Threats to bats, protected species under the Wildlife Act 1976 and Wildlife Amendment Act 2000 and the Bern (1982) and Bonn (1979) conventions, identified in the EcIA (Faith Wilson, 15th December 2021) include:

(i) Light pollution (inappropriate lighting)

(ii) Loss of potential Tree Roosts

(iii) Loss of foraging areas - removal of hedges and scrub)

(iv) Water pollution

(v) Infilling of ditches

Despite this:

(i) Lighting has been proposed alongside hedgerow to be retained (refer 1 (iii) above). Removal of pedestrian loop walkway to be considered.

(ii) Trees identified in the northwest corner of the site as potential bat roosts have been proposed for removal

(iii) Willow and ash along the southern ditch of the northern field was completely removed in between the ecologists visits to make way for the development.

(iv) Large amounts of the western boundary hedgerow to the northern field were removed between site ecologists visits to make way for the development (EcIA page 15).

(v) The deep drainage ditch along the west of the site is being infilled for conversion to a swale. The network of drainage ditches link into the Tobermaclugg and Lucan Streams.

The applicant is requested to address the above and consider maintaining the drainage ditch.

(g) Impact on Badgers

The badger is an internationally protected species under the Wildlife Act 1976 (Amended 2000) and the Bern (1982) convention. The EcIA (Faith Wilson, 15th December 2021 - page 20) identified a badger sett on the southeastern boundary of the site for which remedial measures are proposed in the form of an ecological corridor and badger protective fencing. The report identified other badger setts

within the wider area (Page 26). The report stated that habitat connectivity between these setts must be protected and enhanced. It is noted that the Celbridge Link Road (SDZ17A/0009) segregates the habitat. The applicant is requested to review the badger protection measures in the context of adjoining approved development and revise their approach to badger protection accordingly. It should be noted that no badger protection fence was proposed under SDZ21A/0003. The Planning Authority has concerns in relation to the incompatible approach to badgers in the area and requests that the Ecological assessment and badger mitigation be revised to consider the context of the permitted development in the area.

(2) Street trees are severely lacking.

A redesign of the streets throughout the development is required to provide street trees. Trees that are integral to the street need to be in public ownership and comply with the requirements of Adamstown SDZ (2014), Adamstown Street Design Guide (2014) and DMURS (2019). The applicant is requested to provide Street Trees in accordance with the ASDG.

(3) The applicant has provided insufficient SuDS Tree Pits. All trees within/adjacent to hard surface areas should be in SuDS tree pits. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'

(4) Public Open Space

(a) The Planning Authority considers that this is one functional area of public open space for the entire development, i.e. a pocket park in the southeast of approximately 0.2ha or 2% of the development. Development Area 5 is required to provide 0.67 hectares of Public Open space. The applicant is requested to demonstrate that this has been provided. The Landscape Rationale includes areas in the public open space calculation that cannot be considered as public open space.

(i) An ecological corridor, constituting a linear network of scrub planting and retained trees, hedgerows and native vegetation with badger proof fencing that will be 'allowed to develop and mature without trampling impacts and also reduce human disturbance' (P33 EcIA, Dec 2021). This approach should be reviewed as part of the revised ecological assessment.

(ii) Cycle paths - the perimeter cycle path is not deemed necessary and should be removed. Noted that the adjacent development to the east has provided a strategic north-south connection for pedestrian and cyclists. The applicant should prioritise connection to same. In addition, the home-zone/back streets are designed as shared surfaces for pedestrians, cyclists and vehicles. The applicant is requested to integrate cycle and pedestrian proposals with those in the adjoining development areas to the east to avoid over-provision and demonstrate convenient connection to the adjacent Airlie Park.

(iii) Boundary Trees and Hedgerows

(6) Play

Additional details, specifications and images shall be provided in relation to the proposed play areas included as part of the landscape proposals. Where possible all play equipment should be of predominantly natural materials with unstructured play included in the proposed design. The playground designer/landscape architect can contact SDCC public realm section to discuss the play items proposed including the inclusion of universally accessible equipment. Where possible the applicant should consider the use of engineered woodchip as playground surfacing material. The applicant is requested to submit:

(a) Details of play items to be agreed with the Public Realm Section. Play proposals should include accessible features.

(b) Details of all play equipment, and safety surface, along with specifications and proof that all

equipment conforms to European Standards EN 1176-1-11 and EN 1177 Playground equipment and surfacing shall be submitted prior to the commencement of development.

(c) Post installation certification by the Royal Society for the Prevention of Accidents will be a requirement.

(d) An Indicative Play Map showing types of play and age groups catered for shall also be submitted.

(7) A redesign of the development to address the issues outlined above related to a lack of integrated design both within the development and with its context. All relevant submitted plan and details, drawings and reports should be revised accordingly.

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/0023

Date: 24-Feb-2022

Yours faithfully,


for Senior Planner