

Comhairle Chontae Atha Cliath Theas

PR/0441/22

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD22A/0039 **Application Date:** 10-Feb-2022

Submission Type: New Application **Registration Date:** 10-Feb-2022

Correspondence Name and Address: Brock and McClure Planning & Development 63,
York Road, Dun Laoghaire, Co. Dublin

Proposed Development: (a) The demolition of two existing habitable structures on site including a bungalow (Silveracre), an existing cottage (No. 6 Whitechurch Road) and a row of 5 derelict structures/cottages located along the western boundary of the site (extent of proposed demolition is 433sq.m) (b) the construction of 22 4 bed, 3-4 storey units ranging in size from 197sq.m to 214sq.m, all with associated private balcony/terrace areas. Vehicular and pedestrian access is proposed via new entrance on Whitechurch Road. The proposed development shall provide for 44 car parking spaces, a new single storey bicycle storage shed (approx 34sq.m) and provision of bin storage to be provided at the front curtilage of the dwelling for all terraced units, all boundary treatment, all site services and all associated site works.

Location: Silveracre Bungalow, Whitechurch Road,
Rathfarnham, Dublin 14.

Applicant Name: Dungrey Limited

Application Type: Permission

(COS)

Description of Site and Surroundings

Site Area: stated as 0.58 Hectares on the application.

Site Visit: 25th of March 2022.

Site Description

The subject site is located on Whitechurch Road within Rathfarnham. The site is largely vacant and grassed with an existing single storey detached dwelling in the north of the site and largely derelict cottages along the western (front) boundary of the site. The site is irregular in shape, slightly triangular. The site has one existing vehicular access via Whitechurch Road.

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The western boundary is the frontage along Whitechurch Road. The southern boundary adjoins existing one and two storey residential development. Further south is a Protected Structure (RPS No. 258), known as The Mill House. Along the outside of the eastern boundary is strip of land and on the other side of this is two storey residential development (St. Patrick's Cottages Architectural Conservation Area).

The northern boundary adjoins garden space associated with a dwelling to the north of the site on Whitechurch Road. Loreto High School, specifically the sports pavilion and field, is to the north-east of the site.

Proposal

Permission is being sought for the following works:

- The demolition of two existing habitable structures on site including a bungalow (Silveracre), an existing cottage (No. 6 Whitechurch Road) and a row of 5 derelict structures/cottages located along the western boundary of the site (extent of proposed demolition is 433sq.m)
- The construction of 22 4 bed, 3-4 storey units ranging in size from 197sq.m to 214sq.m, all with associated private balcony/terrace areas. Vehicular and pedestrian access is proposed via new entrance on Whitechurch Road. The proposed development shall provide for 44 car parking spaces, a new single storey bicycle storage shed (approx. 34sq.m) and provision of bin storage to be provided at the front curtilage of the dwelling for all terraced units, all boundary treatment, all site services and all associated site works.

Zoning

The subject site is subject to zoning objective 'RES': *'To protect and/or improve residential amenity'* under the South Dublin County Development Plan 2016-2022.

Consultations

Water Services – further information requested.

Irish Water – no objection subject to conditions.

Roads Department – further information requested.

Public Realm Section – further information requested.

H.S.E. Environmental Health Officer – no objection subject to conditions.

Architectural Conservation Officer – report received.

Heritage Officer – no report received.

Housing Strategy – report received.

Transport Infrastructure Ireland – no report received.

Department of Education & Science – no report received.

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SEA Sensitivity Screening – the following layers are of note:

- The site overlaps with the Strategic Flood Risk Assessment (SFRA) A and B layers.
- The site is proximate to Saint Patrick's Cottages Architectural Conservation Area to the east (separated by a strip of land).
- Further to the south of the site, along Whitechurch Road, is Protected Structure RPS No. 258 The Mill House.

Submissions/Observations/Representations

A total of 4 third party submissions were received raising the following points in summary:

- Treatment of the existing stream along the eastern and northern boundaries of the site. This watercourse is described as a culverted stream and/or river Glin. Fails to integrate this into the proposal. Create ecological corridor along this watercourse.
- Contrary to council policy, Water Framework Directive, EU Habitats Directive, and EIA Directive.
- Should be pedestrian and cycling permeability connections to Grange Road via Tara Hill. Connect green space with existing green space at Tara Hill.
- No construction plan submitted.
- Risk of flooding onsite and downstream. Create natural solutions.
- Concerns in relation to height and proximity to existing residential development. Out of character with existing development. More sympathetic design and reduction in density needed.
- Proximity to and impact on Whitechurch Road, Mill House and St. Patrick's Cottages ACA.
- Massing along Whitechurch Road disrupts existing character.
- Concerns with demolition of cottages, including a habitable cottage facing Whitechurch Road. Incorporate cottage(s) into development.
- Repositioning of the entrance unnecessary and impacts existing boundary.
- Overshadowing and overlooking impacts on existing houses.
- Ecological and traffic documentation and photomontages inadequate. Inconsistencies in submitted documentation.
- Dwelling mix not sustainable. In an area where older residents want to downsize.
- Open space inadequate and poorly designed.
- Concerns with boundary treatment.

An observation was received from An Taisce who stated the following:

We have examined the file and wish to comment that this application should be assessed with regard to impact on the amenity of the area and the relevant provisions of the South Dublin County Council Development Plan.

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We wish to object to the height of the houses, four stories is very high for a four bedroom house. It means too that the height dwarfs the adjoining Mill House, a Protected Structure, and the adjoining ACA, St. Patrick's Cottages.

The houses come very close to the railings along Whitechurch Road. If they were set back and trees provided along the railings they would not be so obtrusive.

The Public Open Space is relatively small and if made into a strip across to the Eastern boundary it could link in to the large open space adjoining on the other side of the river boundary. Also if a bridge was built at this point pedestrians and cyclists would be able to pass through to Grange Road.

These submissions and observations have been reviewed in full and taken into consideration in the assessment of the proposal.

Relevant Planning History

Subject site

SD12B/0315

New 215mm thick boundary wall to the rear to run along the entire rear boundary of the property, 91m long and will have an average height of 2.49m with a maximum height of 2.97m. **Permission granted.**

Adjacent and surrounding sites

S00A/0207 Loreto High School

Construction of new sports hall incorporating changing rooms and showers. **Permission granted.**

S01A/0151 Rear of 8 Whitechurch Road

Two-storey detached house at rear with access onto Tara Hill. **Permission granted.**

SD21B/0490 1 Tara Hill Crescent

Retention of single storey extension to rear of existing end of terrace dwelling; planning permission to remove existing porch and replace with single storey extension to front and side with tiled roof; internal alterations; extend front vehicular access; associated site works. **Application yet to be decided.**

Relevant Enforcement History

None identified in APAS.

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Pre-Planning Consultation

PP045/21

Demolition of a single storey detached dwelling and ancillary works with the proposal of two options for the development. Option 1: Proposed development of 22 x 4 & 5 bed 3 storey townhouse with private roof terraces at 4th floor. Option 2: Proposed development of 16 x 3 storey townhouses with private rooftop terraces at 4th floor and a 4 storey apartment block comprising 16 units being a mix of 1 & 2 bed apartments.

Relevant Policy in South Dublin County Council Development Plan 2016 – 2022

Policy CS1 Consolidation Areas within the Dublin City and Suburbs including Key Metropolitan Consolidation Areas

Policy H6 Sustainable Communities

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

Policy H7 Urban Design in Residential Developments

It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).

Policy H8 Residential Densities

It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.

Policy H9 Residential Building Heights

It is the policy of the Council to support varied building heights across residential and mixed use areas in South Dublin County.

Policy H10 Mix of Dwelling Types

It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.

Section 2.3.0 Quality Of Residential Development

Policy H11 Residential Design and Layout

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It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Policy H12 Public Open Space

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

Policy H13 Private and Semi-Private Open Space

It is the policy of the Council to ensure that all dwellings have access to high quality private open space (incl. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.

Policy H14 Internal Residential Accommodation

It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long term needs of a variety of household types and sizes.

Policy H15 Privacy and Security

It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.

Policy H15 Residential Consolidation

It is the policy of the Council to support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.

Section 3.2.0 Community Facilities

Section 3.13.0 Open Space Management & Use

Policy C12 Open Space

It is the policy of the Council that a hierarchical network of high quality open space is available to those who live, work and visit the County, providing for both passive and active recreation, and that the resource offered by public open spaces, parks and playing fields is maximised through effective management.

Policy UC6 Building Heights

It is the policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.

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Section 6.3.0 Walking And Cycling

Policy TM3 Walking and Cycling

It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation.

Section 6.4.3 Road and Street Design

Policy TM12

It is the policy of Council to ensure that streets and roads within the County are designed to balance the needs of place and movement, to provide a safe traffic-calmed street environment, particularly in sensitive areas and where vulnerable users are present.

Section 6.4.4 Car Parking

Policy TM7 Car Parking

Section 7.1.0 Water Supply & Wastewater

Policy IE1 Water & Wastewater

It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County.

Section 7.2.0 Surface Water & Groundwater

Policy IE2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

Section 7.3.0 Flood Risk Management

Policy IE3 Flood Risk

It is the policy of the Council to continue to incorporate Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.

Section 8.0 Green Infrastructure

Policy G1 Overarching

Policy G1 Green Infrastructure Network

Policy G3 Watercourses Network

Policy G4 Public Open Space and Landscape Setting

Policy G5 Sustainable Urban Drainage Systems

Policy G6 New Development in Urban Areas

Section 9.1.2 Protected Structures

Policy HCL3 Protected Structures

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Section 9.1.3 Architectural Conservation Areas
Policy HCL4 Architectural Conservation Areas
Section 9.3.1 Natura 2000 Sites
Policy HCL12 Natura 2000 Sites

Section 10.0 Energy
Policy E4 Energy Performance in New Buildings

Section 11.2.0 Place Making and Urban Design
Section 11.2.1 Design Statements
Section 11.2.2 Masterplans
Table 11.17: Masterplan Considerations
Section 11.2.7 Building Height
Section 11.3.1 Residential

- (i) Mix of Dwelling Types*
- (ii) Residential Density*
- (iii) Public Open Space/Children's Play*
- (iv) Dwelling Standards*
- (v) Privacy*
- (vi) Dual Aspect*
- (vii) Access Cores and Communal Areas*
- (viii) Clothes Drying Facilities*

Table 11.20: Minimum Space Standards for Houses
Table 11.21: Minimum Space Standards for Apartments

Section 11.4.1 Bicycle Parking Standards
Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards
Table 11.24: Maximum Parking Rates (Residential Development)

Section 11.4.3 Car Parking for Electric Vehicles
Section 11.4.4 Car Parking Design and Layout
Section 11.4.5 Traffic and Transport Assessments

Section 11.6.1 (i) Flood Risk Assessment
Section 11.6.1 (ii) Surface Water
Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)
Section 11.6.1 (iv) Groundwater
Section 11.6.1 (v) Rainwater Harvesting

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Section 11.6.1 (vi) Water Services

Section 11.7.2 Energy Performance In New Buildings

Section 11.8.1 Environmental Impact Assessment

Section 11.8.2 Appropriate Assessment

Relevant Government Guidelines

Project Ireland 2040 National Planning Framework, Government of Ireland, (2018).

Regional Spatial & Economic Strategy 2019 - 2031, Eastern & Midlands Regional Assembly, (2019).

Section 5 – Dublin Metropolitan Area Strategic Plan, in Regional Spatial and Economic Strategy 2019 – 2031.

Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government (2009).

Urban Design Manual: A Best Practice Guide, A Companion Document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of the Environment, Heritage and Local Government, (2009).

Quality Housing for Sustainable Communities-Best Practice Guidelines, Department of the Environment, Heritage and Local Government, (2007).

Sustainable Urban Housing: Design Standards for New Apartments, Department of Housing, Local Government and Heritage, (2020)

Urban Development and Building Heights Guidelines for Planning Authorities, Department of Housing, Planning and Local Government, (2018).

Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, Department of the Environment, Heritage and Local Government, (2009).

OPR Practice Note PN01 Appropriate Assessment Screening for Development Management (March 2021).

The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).

Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice, Building Research Establishment, (1991).

Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020, Department of Transport, (2009).

National Cycle Manual, National Transport Authority, (June 2011).

Childcare Facilities Guidelines for Planning Authorities, Government of Ireland (2001)

Assessment

The main issues for assessment relate to:

- Zoning and Council Policy;
- Part V;

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- Archaeological Conservation;
- Architectural Conservation;
- Residential and Visual Amenity;
- Landscaping and Open Space;
- Services and Drainage;
- Traffic, Access and Parking;
- Environmental Health;
- Environmental Impact Assessment; and
- Appropriate Assessment.

Zoning and Council Policy

The subject site is zoned 'RES': *'To protect and/or improve residential amenity'*. Under this zoning residential development is Permitted in Principle. The proposed use is therefore considered to be generally acceptable, subject to further assessment against the relevant policies, objectives and standards set out under the County Development Plan.

An Architectural Design Statement & Masterplan has been submitted. This design statement includes a site analysis. It doesn't include a concept plan and/or masterplan, however, makes reference to how the proposal was developed. Technical documents are referenced including, but not limited to, the Urban Design Manual (2009) and Design Manual for Urban Roads and Street (2013). The document is therefore considered to be sufficient for the purposes of this assessment.

Part V

SDCC's Housing Department has reviewed the proposed development and states the following:

I refer to the above application for planning permission, SD22A/0039 and I wish to advise that a Part V condition should be attached to any grant of permission for this application.

The Part V submission lodged with this planning application is noted, the developer has proposed to fulfil their Part V obligation by providing 2 x 4 Bed 4 Storey Semi-Detached houses. South Dublin County Councils will consider all options available to fulfil part v as per the Planning and Development Act 2000 (as amended).

South Dublin County Council can only agree Part V in respect of the permitted development subject to costing approval from the Department of Housing, Local Government & Heritage. Please note that the Council would require a fully completed Part V submission prior to commenting on costs.

The Part V percentage liability is dependent on the date the applicant purchased the subject site and the applicant is required to provide proof of same to the Housing Department.

Please note that collateral warranties will be required from the Developer in respect of the contractor, consultants and sub-contractors.

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This report is noted. A Part V condition should be included in the event of a grant of permission.

Archaeological Conservation

The applicant has submitted an Archaeological Assessment for the site. The site is not within nor proximate to an Area of Archaeological Potential or a Recorded Monument or Place. The assessment finds that the site is considered to possess a low-moderate archaeological potential. Measures in relation to monitoring all ground disturbances are recommended. In the event of a grant of permission a condition relating to archaeological monitoring, recording and reporting should be attached.

Architectural Conservation

SDCC's Architectural Conservation Officer has reviewed the proposed development and states the following:

The site adjoins the area of Saint Patrick's Cottages/Tara Hill which is an Architectural Conservation Area and is located to the north of Protected Structure, RPS Ref.258 'The Mill House'. The area of the Mill House and other areas along Whitechurch Road are characterised by the existing stone boundary walls and rural character. The proposed development includes the demolition of two existing habitable structures on the site including a bungalow (Silveracre), an existing cottage and 5 derelict structures/cottages located along the western boundary of the site. It is proposed to construct 22 townhouses with private roof terraces at 4th floor level.

It is considered that the house type, height and overall design does not reflect the site context and development type along Whitechurch Road. No cognisance has been given to the existing character along Whitechurch Road nor how the proposed development will sit within existing house types, including the Protected Structure (Mill House) to the north and adjoining an Architectural Conservation Area. The report on the architectural significance of the lands at Whitechurch is welcomed in providing a photographic record and appraisal of the buildings and ruins which are to be demolished as part of the proposed development.

The main areas for concern are as follows:

- *Overall height, form and design of the proposed new dwellings (UDBHG 2018 and CDP policy it should be noted that BHG needs to take account of existing built environment and any direct visual impacts on Protected Structures and ACAs).*
- *Lack of sensitivity within the overall context of the site*
- *Lack of streetscape and street frontage in order to reflect the existing characteristics of Whitechurch Road.*
- *Design rationale and proposed materials and finishes – No cognisance has been given to the adjoining architectural quality of the area and in particular the Protected Structure in close*

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proximity and the adjoining ACA. The existing building palette in the area would be predominately stone and render. Brick is used for dressing and feature detail for dwellings at St. Patricks Cottages however St. Patricks cottages are set back from Whitechurch Road and are a formed residential group.

- The proposal fails to provide a sensitive new development at this location given the overall design and layout as above – The proposed development will be highly visible and will dominate views on approach along Whitechurch Road and therefore needs to be more sensitive in its design to minimise visual impact. It is considered that a more simple contemporary and clean design, smaller in scale and form would be more appropriate. The use of render and stone should be the main building material with improved architectural design and detail addressing the street frontage along Whitechurch Road.

I would be recommending a complete redesign to address the above issues in providing a more suitable and sensitive development at this location.

The report from the Architectural Conservation Officer is noted. **It is considered that these concerns should be addressed via additional information.**

Residential and Visual Amenity

Demolition of Existing Buildings

As part of the proposal, permission is sought to demolish the existing structures and houses onsite including 1 single storey detached dwelling in the north of the site and 1 cottage and other derelict cottages along the western boundary of the site. Third party submitters have advised that these cottages should be retained and incorporated into the development. It is noted that these structures have not been noted of being of significance in relation to architectural conservation. These cottages are largely derelict and in a state of disrepair. It is therefore considered that the proposed demolition of existing buildings onsite is acceptable.

Unit Mix and Type

The proposed development would involve the construction of 22 residential units, comprised of semi-detached and terraced dwellings. Policy H10 of the County Development Plan relates to providing a wide variety of adaptable housing types, sizes and tenures in accordance with the Housing Strategy. The dwellings would be 4-bedroom (7 person), apart from Units 7 and 8, which are noted as having 5 bedrooms as shown on the proposed floor plans.

In terms of house types, 7 house types are being proposed. The main differences between these house types appear to be whether they are end of terrace, mid terrace or semi-detached, which in

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turn impacts the internal layouts. A greater variation in house types and design should be explored. This is discussed further in this report in relation to visual impact.

Residential Density

The proposed residential density would be approx. 37.9 units per ha. The subject site is located within 'Dublin City and Suburbs' in the Settlement Hierarchy under the County Development Plan (Variation 4). Policy H8 of the County Development Plan states it is Council policy to promote higher densities at appropriate locations having regard to the surrounding context.

Section 11.3.1 (ii) states that density should be determined with reference to the 2009 Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities. Higher residential densities will be promoted within walking distance of town and district centres and high capacity public transport facilities. The residential density (net) of new development should generally be greater than 35 dwellings per hectare, save in exceptional circumstances.

Within reasonable walking distance to the site (under or around 10 minutes) are existing bus services (some with frequencies of 10-15 minutes), including those along Grange Road and Willbrook Road. BusConnects would upgrade bus services in the area, including upgrading Grange Road to a Spine/Branch Route. The site is an approx. 10 minute walk to local facilities along Grange Road and Barton Drive. A higher residential density is therefore acceptable subject to how the development addresses the surrounding context.

While the proposed density is acceptable, the Planning Authority has serious concerns regarding the impact of the proposed dwellings on existing residential development and the surrounding area. This is discussed further in this report.

Building Heights

The proposed dwellings would be 4 storeys in overall height. From the front elevation the buildings would be 4 storeys with the top floor setback to provide for a roof terrace at third floor level. At the rear the building would appear as 3 storeys with a pitched roof. The overall height of the dwellings would be approx. 12.3 m. The height above ground level of the dwellings would slightly vary throughout the site given differences in the ground level. The site slightly slopes, mostly from west up to east. **The applicant should be requested to submit a revised proposed site layout with proposed levels to confirm.**

Existing residential development adjoining or proximate to the site is one to two storeys in height. Under Section 11.2.7 of the County Development Plan proposals for buildings greater than the prevailing building height in the area should be supported by a strong urban design rationale and

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provide transitional elements. The appropriate height of a building will be determined by proximity to existing housing, including that new development adjoining 1 or 2 storey housing shall be no more than 2 storeys in height, unless a separation distance of 35 m or greater is provided.

The Planning Authority acknowledges that the Section 11.2.7 text may be viewed as a blanket height restriction that runs contrary to the Urban Development and Building Height Guidelines, specifically SPPR 1. It is noted that SPPR1 supports the incorporation of increased building height and density in locations with good public transport accessibility in development plans. SPPR3 provides a framework for planning authorities to grant permission contrary to their development plan subject to being satisfied that the applicant has met specified criteria.

The proposed dwellings would be approx. 16.9m from existing two storey dwellings on Tara Hill Crescent to the east. They would be approx. 12.7m to 12.8m from the one and two storey dwellings on Whitechurch Road to the south. By way of height and proximity the Planning Authority has concerns that the proposed dwellings could have a significant overbearing, overshadowing and overlooking impacts on existing residential development to the east and south of the site.

A revised proposal should be submitted addressing these concerns. The proposed dwellings, especially where they would be proximate to existing residential development, should be reduced to a more appropriate height. Further separation distances should be considered; however, the Planning Authority acknowledges these can only be extended so far before comprising the overall layout of the development. Separation distances below those prescribed may be acceptable if the dwellings are redesigned so as to fully address concerns in relation to impacts on existing residential development. **This should be addressed via additional information.**

General Layout & Permeability

The proposed dwellings would be along the northern, eastern and southern parts of the site. An area of public open space, adjoining Whitechurch Road, would be centrally located within the development. A central area of public open space, visible from Whitechurch Road is welcomed and would add to the amenity of the site. The use of homezones in appropriate areas of the site is welcomed.

The proposed layout would include a new singular vehicular access from Whitechurch Road (moved southwards from existing). Two pedestrian accesses would be provided from Whitechurch Road. Third parties have raised the consideration of access to the east to Tara Hill and onto Grange Road. It is noted that the site's eastern boundary adjoins a strip of land (with a piped stream). This land is outside of the control of the applicant. Given the above, it is not considered that an access via the eastern boundary should be requested.

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Standard of Accommodation

A Housing Quality Assessment has been submitted. All the proposed dwellings would be approx. 120sq.m in size, which complies with the minimum standards. Sufficient internal storage space for the dwellings would be provided. The proposed bedrooms would meet the minimum floorspace requirements. The applicant has stated that the dwellings would all be 4 bedroom. However, Unit Type B and C (Units 7 and 8) have 5 no. bedrooms as shown on the proposed floor plans. This has been taken into consideration in the assessment of the development.

Private amenity space for each dwelling would be provided as a combination of third floor level terrace and ground floor rear garden. The sizes ranges from approx. 69.3sq.m to 133.5sq.m. The 69.3sq.m space provision is the only private amenity space under the 70sq.m requirement. However, it is noted this is only slightly undersized and is therefore acceptable in this instance.

Given the private amenity space relies on a roof terrace to achieve the minimum required, the garden spaces are smaller than usual. In the event of a grant of permission the Planning Authority will consider including a condition requiring permission for any development falling within Classes 1 or 3 of Schedule 2, Part 1 of the Planning and Development Regulations 2001 (as amended).

House No. 8's private garden space wraps around the rear and side, and to the front, of the dwelling. The CDP states that private open space should be located behind the front building line of the house and be designed to provide for adequate private amenity. It would also be preferable that this space was more combined for usability. The layout of House No. 8 should be revised to provide for private amenity space the behind the front building line. **This should be requested via additional information.**

Visual Impact

Section 11.3.2 of the County Development Plan sets out a number of design criteria in relation to infill sites. On smaller sites of approximately 0.5 hectares or less a degree of architectural integration with the surrounding built form will be required, through density, features such as roof forms, fenestration patterns and materials and finishes. The site is approx. 0.58 ha in size. While this is slightly over 0.5 ha it is close enough that consideration should be given to the design of the proposal in relation to surrounding built form. Especially, as the Architectural Conservation Officer has raised, due to its proximity to structures of architectural importance.

The applicant has submitted photomontages and drawings illustrating the visual impact of the proposed development. The Planning Authority has concerns in relation to the visual impact of the proposed dwellings. This is in relation to existing residential development, which has been discussed above. There are also serious concerns in relation to the proposed frontage along

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Whitechurch Road. Due to height and proximity to Whitechurch Road the proposed development would appear out of scale with existing development along this road.

The proposed dwellings at the Whitechurch Road boundary do not sufficiently address this road. The dwellings at this boundary should provide a dual frontage in order to avoid blank facades and maximise surveillance of the public domain. The dwellings should either face the road or an appropriate dual frontage should be provided. The height should also be reviewed and reduced along this frontage to provide an appropriate transition.

The proposed materials and finishes are largely selected smooth render plaster boards, selected red brickwork and self-coloured render/pointed napp plaster finish. The Architectural Conservation Officer has raised concerns in relation to the proposed materials and advises the use of render and stone. The Planning Authority also consider that greater variation in materials across elevations should be provided. In particular the rear elevations, which would face existing residential development.

The dwellings are all of a similar design, scale and form. As stated previously, the proposed house types do not greatly differ in terms of external design. Consideration should be had to providing some variance between the dwellings.

The applicant should be requested to submit a revised proposed development that addresses the above concerns so that the development better integrates with and address the surrounding development in terms of scale, design and materials. **This should be requested via additional information.**

Landscaping and Open Space

A central area of public open space, measuring approx. 580sq.m, is proposed. This equates to approx. 10% of the total site area. This area would also function as a detention basin for surface water. An attenuation tank is proposed under this space.

In terms of boundary treatment it is proposed to make existing walls along the northern, eastern and southern boundaries 2.0 m high block walls, capped and rendered on both sides. A 1.8 m wide footpath would be provided along Whitechurch Road, along the front of the site. Along the Whitechurch Road boundary a 1.1 m high low level wall clad in stone with galvanised steel railings above would be provided. Boundary hedge planting is proposed behind this.

Where this boundary is along the sides of Houses No. 1 and 22 the wall would extend to a 2.0 high block wall. This treatment of the front boundary is not acceptable. These houses should be designed

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to account for that they would be visible from the front and side. A dual frontage should be provided and a privacy strip behind a low wall, hedge or railings should be provided until where it meets the rear private amenity space. **This should be addressed via additional information.**

Public Realm has reviewed the proposed development and requests further information as follows:

Landscape Proposals

Public Open Space provided within a residential development should contribute towards the County's green network, provide a local park, provide play space or playgrounds, create new civic space/plaza, or improve the amenity of a streetscape. Green spaces can also help with surface water management through integration with sustainable urban drainage systems. Public open space provided within new residential developments should be genuinely accessible to the general public. Public open space is open space which contributes to the public domain and is accessible to the public for the purposes of active and passive recreation, including relaxation and children's play. Public open space also provides for visual breaks between and within residential areas and facilitates biodiversity and the maintenance of wildlife habitats. All public open spaces shall be of a high quality in terms of design and layout, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of residential units. The proposed development should create positive additions to the open spaces of the area in the form of planting, permeability, and usable open space.

The applicant shall provide additional information and consider a possible re-design in order to address the following issues:

- i. Public open space with the proposed development is to be relocated along the eastern portion of the subject site to include the existing piped stream with the landscape proposals for the development. The extension of the red line boundary will require approval from the Development Department of SDDC.*
- ii. The daylighting and inclusion of the stream along the eastern boundary would promote biodiversity and ecology, improve the amenity and of Green Infrastructure of the site and help control and manage the quality and quantity of surface water within the development. The inclusion of the stream with the open space provision would also prevent any future development adjacent to the stream and allow access to the stream for maintenance purposes.*
- iii. The applicant has not provided details as to the levels and gradients with the proposed public open space areas. The developer shall submit level details for the open space areas, this shall include cross section drawings where applicable.*
- iv. The applicant has proposed that an attenuation tank be located under the main public space area within the development – much of the public open space area is taken up by this proposed attenuation tank. This is not acceptable to the public realm section. Revised drawings and proposals should be provided in this regard.*

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- v. *The proposed SUDs are unacceptable. Water should be attenuated as close to where it falls as possible, so natural SUDS features such as permeable paving, tree pits, swales are required to be included.*
- vi. *Public Realm requires a tree survey of the site in order to establish the impact of the development on existing vegetation including the impact of daylighting of the watercourse and to propose mitigation measures if deemed required.*
- vii. *There is a lack of street tree planting, as per Section 3.4.4 of the Adamstown Street Design Guide, On-street car parking shall be combined with regular tree planting and a high standard of kerbing and paving. It is a general objective that not more than five perpendicular or two parallel car parking spaces be allowed between trees. Trees shall be planted into a porous material with structural root soil and constructed tree pits between the car spaces. Tree pits shall contain SUDS features. In addition, the street frontage to Whitechurch road should include street trees.*
- viii. *The applicant has failed to provide of plan which clearly delineates public, communal and private spaces provided, as well as a detailed breakdown of the total area of same. Response should include a plan which clearly delineates public, communal and private spaces to be provided.*
- ix. *Any proposed pedestrian connections to adjoining lands should be clearly indicated on plans. The applicant should show how public open spaces in the wider area will link in and integrate with the proposed development. The public realm should be integrated into the adjacent development areas, creating continuous green infrastructure connections that form both physical and biodiversity links. Open space to be landscaped for amenity and biodiversity*

DMURS and Street Trees

DMURS seeks to put well-designed streets at the heart of sustainable communities and supports boarder government policies on the environment, planning and transportation. DMURS provides the practical measures to achieve:

- Highly connected street which allow people to walk and cycle to key destinations in a direct and easy-to find manner.*
- A safe and comfortable street environment for pedestrians and cyclists of all ages.*
- Streets that contribute to the creation of attractive and lively communities.*
- Streets that calm traffic via a range of design measures that make drivers more aware of their environment.*

Section 4.2.2 Street Trees from the Design Manual for Urban Roads and Streets 2019 (DMURS) states that "Street trees are an integral part of street design as they contribute to the sense of enclosure, act as a buffer to traffic noise/ pollution and enhance place. A traffic calming effect can also be achieved, where trees are planted in continuous rows and their canopies overhang, at least in part, the vehicular carriageway. Street trees can also be used to enhance legibility by highlighting the importance of connecting routes and distinguishing one area from another through variations in size and species selection. The planting of trees should be considered as an integral

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part of street design. In general, the size of the species selected should be proportionate to the width of the street reserve”

Street trees shall be provided fully in Public Areas and not between private or management company driveways. Street Tree Planting shall be located within the Public Realm and include SUDS features. There is a lack of street tree planting proposed within the development. Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.

SuDS and Green Infrastructure

A SuDS strategy should be developed for the proposed development which takes account of quantity, quality, and amenity issues. The design of SuDS features is required to be of high quality to achieve a multifunctional space for amenity, biodiversity and surface water management. The proposed SuDS features should aid the maintenance of the existing greenfield runoff rates or potentially reduce the amount of surface water entering the piped surface water system.

The current proposed drainage system needs to be developed further in order to sustainably manage surface water through a natural hydrological regime or SUDS scheme within the development. The philosophy of SUDS is an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and habitat/biodiversity enhancement. Additional SuDS that should be considered for the SHD development include:

- Bio retention systems*
- Infiltration systems*
- Tree pits*
- Channel rills*
- Green area detention basins*
- Additional swales*

Were possible in addition to the SUDS features proposed the applicant should provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.
Revised proposals to be provided by the applicant in this regard. Response should include revised layout and drawings.*

Water Attenuation within Public Open Space

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

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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 is to be provided by the applicant. Further consideration of the of the location and size of attenuation tanks needs to be carried out. The size of the proposed attenuation tank should be through the provision of additional natural SUDS features as part of the storm/surface water drainage scheme for the proposed development Response should include revised layout and drawings.

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.

Play Provision

There is a lack of detail in terms of the play provision being proposed within the development. There is a lack of detail in terms of items being provided and there also seems to be insufficient play items being provided considering the size of the proposed 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 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 proposals, including the inclusion of additional universally accessible equipment. Detailed information on the number and types of play items being delivered to be provided by the applicant in this regard. Response should include revised layout and drawings.

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Proximity of Development to stream along Eastern Boundary

The location/proximity of the proposed buildings/housing units to stream along the eastern boundary of the subject site contravenes Planning Policy G3 Objective 2 of the CDP 2016-2022 - G3 Objective 2; "To maintain a biodiversity protection zone of not less than 10 meters from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities." The applicant should clearly show on a drawing a 10m set back from any proposed building to the top of the bank of this water body. Response should include revised layout and drawings.

The Public Realm Section has assessed the proposed development in accordance with the policies and objectives of the County Development Plan 2016-2022 and with best practice guidelines and recommends the following additional information be provided:

1. Relocation of Open Space and Daylighting of Existing culverted Stream along Eastern Boundary

The main open space within the proposed development shall be relocated along the eastern boundary to include the existing piped stream. This existing piped stream shall be opened up/daylighted in order to improve amenity, biodiversity, GI and to help control and manage the quantity and quality of surface water on site. In order to facilitate the daylighting of this culverted stream the Developer is requested to contact the Development Department of SDCC in order to seek permission to extend the red line boundary of the proposed development in order to include the stream along the eastern boundary within a planning application. Permission to extend the red line boundary will be made without prejudice and does not confer any rights to enter onto lands and carry out works. Separate permission is required in relation to entering lands and carrying out works. Please note a grant of permission to include SDCC lands within a planning application does not consider the acceptability or otherwise of the planning proposals; which will be subject to a separate consideration by the planning authority. Response should include revised layout and drawings.

2. Landscape Design Proposals

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The applicant shall provide the following additional information:

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- i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.*
- ii. 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. Street Frontage to the Whitechurch Road should include street trees planting.*
- iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.*
- iv. The proposed attenuation tank shall not be located under the main open space for the proposed development. The proposed attenuation tank should be relocated and reduced in size through the provision of additional natural SUDS features as part of the storm/surface water drainage scheme for the proposed development.*

ADDITIONAL INFORMATION

2. Tree Survey

The applicant is requested to submit a comprehensive Tree Report. This shall comprise of a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction - recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- (i) Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. vegetation contained along the banks of the culverted stream) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site*
- (ii) Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.*
- (iii) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).*
- (iv) Design Iteration - Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retention.*
- (v) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.*

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(vi) *Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities; plant, equipment and materials storage etc. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.*

(vii) *Arboricultural Method Statement: clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.*

(viii) *Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.*

(ix) *The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.*

(x) *Arborist's name, arboricultural qualifications and contact details.*

(xi) *Date that the survey was carried out (surveys > 12 months are unacceptable).*

3. Street Trees

The current landscape proposal for the development contains a lack of street tree planting and is not acceptable to the Public Realm Section. The applicant is requested to submit a revised landscape plan to incorporate additional street trees. Street trees within the development shall be provided fully in Public Areas and not between private or management company driveways. Street Tree Planting shall be located within the Public Realm and include SUDS features. Response should include revised layout and drawings. ADDITIONAL INFORMATION

4. Play Provision

A detailed play strategy for the subject site to be submitted, additional details to be provided include:

i. *a specification of all play equipment to be installed including provision for children with disabilities and special sensory needs;*

ii. *a specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas.*

ADDITIONAL INFORMATION

5. Attenuation and Public Open Space

The issue of surface water attenuation is a significant concern for the Public Realm Section. The proposed attenuation tank is located under an area 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

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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 shall include the provision of additional natural SUDS features to reduce or remove the need for an attenuation tank within the development. Further consideration of the breakdown in provision of open space, the location and size of attenuation tank proposed, and the incorporation of additional SUDS measures needs to be carried out. Response should include revised layout and drawings and avoid the use of underground tanks within open space areas where possible

6. SUDS

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 shall be incorporated into the proposed drainage system for the development such as rain gardens, detention basins, filter drains, swales etc. In addition, the applicant shall provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.*
- The applicant is referred to the recently published SDCC SuDS Design Guide for further information and guidance.*

ADDITIONAL INFORMATION

7. Proximity of Development to Stream along Eastern Boundary

*The current location/proximity of the proposed buildings/housing units to stream along the eastern boundary of the subject site contravenes Planning Policy G3 Objective 2 of the CDP 2016-2022 - G3 Objective 2; "To maintain a biodiversity protection zone of not less than 10 meters from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities." The applicant should clearly show on a drawing a 10m set back from any proposed building to the top of the bank of this water body. Response should include revised layout and drawings as recommended above (1. Relocation of Open Space and Daylighting of Existing culverted Stream along Eastern Boundary). **ADDITIONAL INFORMATION***

8. Alien Invasive Plant Species Survey

*The applicant shall submit an Alien Invasive Plant Species Survey Report for the subject site to the Planning Authority. **ADDITIONAL INFORMATION***

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The report from the Public Realm Section is noted. These items should be requested **via additional information**.

While the reasons to move the public open space to along the eastern boundary are acknowledged the Planning Authority are concerned this would lead to a less usable strip of open space behind rear gardens, which is not desirable. This would lead to a lack of passive surveillance and accessibility for the open space. A more central, focused area of open space is preferred. The relocation of the public open space should therefore not be requested. The treatment of the piped stream to the east, however, is discussed further below.

The Planning Authority does note the concerns in relation to public open space being located over an underground attenuation tank. Further above ground SuDS should be explored to omit the need for an underground attenuation tank. In line with Council policy, IE2 Objective 5 and Section 11.6.1 (iii), these should only be considered as a last resort.

The applicant has submitted an Ecological Impact Assessment Report. Third party submitters raised concerns in relation to lack of ecological surveys. The assessment submitted details the range of ecological surveys conducted on the site. In the event of a grant of permission the mitigation measures from this report should be conditioned.

Services and Drainage

Water Services has reviewed the proposed development and requests further information in relation to surface water and flood risk:

Surface Water Report: Further Information Required:

1.1 Water services recommend that proposed open space, houses and bicycle shed be relocated such that the public open space is located adjacent to existing piped stream east of site. It would promote biodiversity and existing piped stream could be opened subject to planning and moving out red line boundary. This would also prevent any future development adjacent to piped stream and allow access to stream for maintenance purposes.

1.2 The Developer is requested to contact the Development Department of SDCC in order to seek permission to extend the red line boundary of the proposed development in order to include the stream along the eastern boundary within a planning application. Permission to extend the red line boundary will be made without prejudice and does not confer any rights to enter onto lands and carry out works. Separate permission is required in relation to entering lands and carrying out works. Please note a grant of permission to include SDCC lands within a planning application does not consider the acceptability or otherwise of the planning proposals; which will be subject to a separate consideration by the planning authority.

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1.3 *The developer is requested to open up pipe stream east of development subject to landowner/ planning approval.*

1.4 *Submit a drawing and report to show what SuDS (Sustainable Drainage System) are proposed for the development. Show in m³ what surface water attenuation capacity proposed SuDS systems have. Examples of SuDS include:*

Green roofs,

Swales

Tree pits

Permeable Paving

Rain gardens

Channell rills

Water butts

Grasscrete

Flood Risk Further Information Required:

2.1 *Submit a report and drawing to clearly show the location of proposed site on an OPW CFRAM Flood map. This will identify the location of site relative to adjacent flood zones if any and determine if any flood risks arise.*

2.2 *If there is a risk of flooding such as a 1 in 1,000 year flood risk outline in a report and drawing what flood mitigation measure are proposed for the development. Outline in report what if any flood risk there is for property upstream and downstream of proposed development due to same.*

2.3 *Prior to submission of revised documents contact water services of South Dublin County Council to discuss same.*

The Planning Authority notes the Public Realm and Water Services concerns in relation to the piped stream along the eastern boundary of the site. Third party submitters have also raised concerns in relation to this and the failure to integrate this into the development. The Planning Authority is concerned that as a result of the proposed development this strip of land would be further isolated and access to it restricted (when required for maintenance).

The applicant should be requested to consider this piped stream in the overall development scheme. It is requested that the nature of this infrastructure, whether it is only a piped stream, is confirmed. The site boundary (red line) should be extended to include this strip of land. The applicant should consider whether appropriate landscaping could be provided along this strip of land (in line with ecological surveys). Dedicated access to this strip of land from the subject site should be provided.

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An appropriate setback distance of structures from any pipe should be provided. The separation distance of the proposed bicycle store and House No. 8 in particular from the eastern boundary should be reviewed in relation to this. **This should be requested via additional information.**

The subject site is noted as overlapping with Strategic Flood Risk Assessment (SFRA) A and B layers. In line with Water Services' report, **additional information in relation to flood risk should be requested.** Any mitigation measures in relation to this should be incorporated into the design of the proposal.

Irish Water has reviewed the proposed development and has no objection subject to standard conditions relating to connection agreements. This report is noted and should be conditioned in the event of a grant of permission.

Traffic, Access and Parking

The proposed development would provide for 2 car parking spaces per dwelling. These spaces would be provided in curtilage. Bicycle parking would also be provided in curtilage. Secure bicycle parking also would be provided in the east of the site for the mid-terrace units only. This is stated as having a capacity of 4 bicycle parking spaces per dwelling (32 in total). Visitor bicycle parking (12) would be provided at the public open space. It is therefore considered that car and bicycle parking have sufficiently been provided for. External bicycle parking should be covered.

The Roads Department has reviewed the proposed development and requests additional information:

The existing dwelling is accessed of the Whitechurch Road, the applicant proposes to replace the two existing access locations with a new entrance. Visibility splay have been submitted detailing 49m in both directions.

The vehicle access location is proposed to be 5.0m wide with 5.0m corner radii. The junction will have a raised table to the adjoining public footpath.

The internal road widths are 5.0m for the main development road and 4.8m for the shared surface roads. The shared surface road to the north of the development has only a 4.8m space behind the on-curtilage parking spaces of units 20,19,18, 17, 8,7 and 6 this must be 6.0m spacing to allow for safe turning. The turning space at units 13,14,15 and 16 could be 5.7m again this must be confirmed at 6.0m spacing. The applicant should submit an autotrack or similar detailing how the on-curtilage spaces can be accessed by vehicles.

A traffic impact assessment was conducted based on 2017 figures. The report focused on the percentage increase in traffic from the development and concluded that it will not generate

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significant levels of additional traffic volumes. The applicant has concluded that as the percentage increase in traffic at the Willbrook Road/Ballyboden Road junction is below 5% no further traffic analysis will be provided as detailed in the TTA guidelines.

Permeability:

Pedestrian permeability within the development is good. There are two proposed pedestrian access and three of the roads are to be shared surfaces. The footpaths are proposed to be 1.8m wide where provided. It is not clear from the drawing if the footpath alongside unit 9 is 1.8m wide or if it is a shared space between vehicles and pedestrians, this should be confirmed. A pedestrian link to Tara Hill estate through the east would be welcomed, to increase the permeability for the surrounding dwellings.

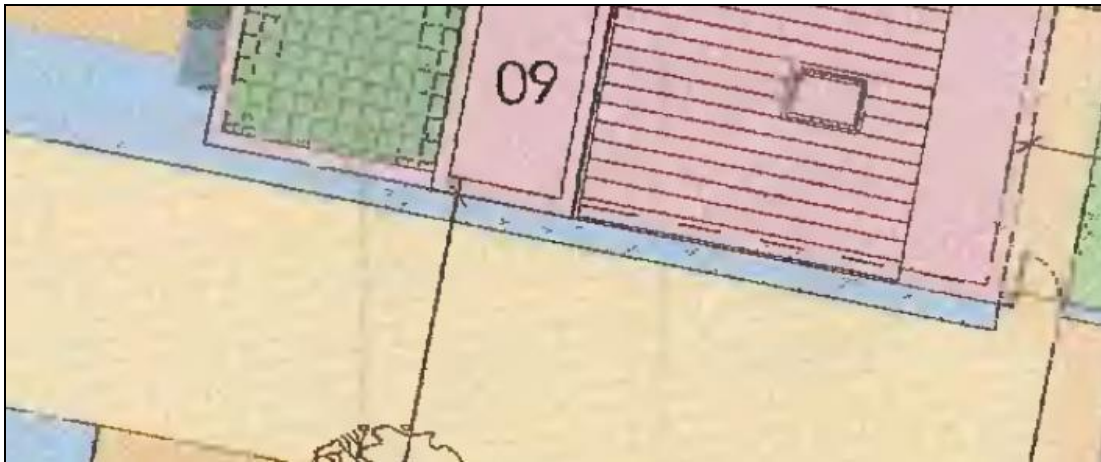


Figure 3 footpath

It is proposed to provide a 1.8m wide footpath along the front of the development along Whitechurch Road, this must connect to existing walking infrastructure. The existing walking and cycling infrastructure along Whitechurch Road are very poor and improvements are welcomed. The footpath is narrow 0.7m in places. There is no footpath to the north towards Ballyboden Road/Willbrook Road, potentially the strongest pedestrian desire line towards Rathfarnham Village and public transport. There is a potential pedestrian route through Willbrook Grove towards Ballyboden Road, that could be accessed by uncontrolled pedestrian crossing from the proposed development across Whitechurch road over the bridge at the whitechurch stream.

Car Parking:

The proposed development is providing 44 car parking spaces for 22 dwellings. The dwellings are 4 four bedroom and will each have 2 on curtilage parking spaces. All will have ducting to enable E.V.

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charging if required. The amount of parking provided is at the maximum allowed under the County Development plan.

Bicycle Parking:

Cycle parking will be accommodated within the curtailment of each dwelling, there is provision of bicycle parking for the mid terraced units in the development having 32 spaces 4 for each mid terraced unit. There is also 12 visitor spaces close to the entrance.

Taking in Charge:

No area for taking in charge has been submitted.

Bin storage & Collection:

A swept path analysis has been submitted for refuse vehicles and fire tenders and details no conflicts. The turning manoeuvre will involve a 12m (approximately) reversing distance for the vehicles.

Public Lighting:

Site and Public Lighting design has not been submitted with this application.

Prior to the commencement of development, the applicant shall agree in writing a public lighting scheme with South Dublin County Council Lighting Department. Once agreed, the scheme shall be constructed/installed to taking in charge standards at the expense of the developer and to the satisfaction of South Dublin County Council Lighting Department.

Accessibility

The closest high frequency public transport would be on Grange Road approximately 750m north of the development. A closer bus stop is on Ballyboden Road but has limited service. This route may be upgraded by BusConnects route 74 to the city centre running at intervals of 30 minutes weekdays.

Roads recommend that additional information be requested from the applicant:

- 1. The applicant/developer is requested to submit a full swept path analysis for the proposed development. The analysis shall demonstrate the safe and efficient access and egress of the private vehicles from each dwelling, in particular No. 20,19,18, 17, 8,7 and 6. The applicant is also requested to submit any revised plans that may be required considering the above information.*
- 2. The applicant is requested to submit a revised layout not less than 1:100 scale showing the location, design, and construction of an uncontrolled pedestrian crossing from the development to the footpath on the west side of Whitechurch Road, including safety barriers. To be constructed by the applicant/developer and at their own expense.*

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3. *The applicant/developer is requested to submit a revised layout not less than 1:100 scale showing the pedestrian routes within the development.*
 - a. *The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users.*
 - b. *Footpath layout shall provide adequate connectivity around the development and footpaths on the main road.*

Should the permission be granted, the following conditions are suggested:

1. *A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be submitted for the written agreement of the Planning Authority. REASON: In the interest of sustainable transport.*
2. *Prior to the commencement of development, the applicant shall agree in writing a public lighting scheme with South Dublin County Council Lighting Department. Once agreed, the scheme shall be constructed/installed to taking in charge standards at the expense of the developer and to the satisfaction of South Dublin County Council Lighting Department.*
3. *Prior to commencement of development, the applicant shall submit a developed Construction Traffic Management Plan for the written agreement of the Planning Authority.*
4. *All items and areas for taking in charge shall be undertaken to a taking in charge standard. Prior to development the applicant shall submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.*
5. *The applicant shall provide 5% of vehicular parking spaces for mobility impaired users, and 10% vehicular parking spaces to be equipped with electrical charging points, REASON: In the interest of sustainable transport.*
6. *The boundary walls and gates at vehicle access points shall be limited to a maximum height of 0.9m, and any boundary pillars shall be limited to a maximum height of 1.2m, to improve forward visibility for vehicles.*

Public Lighting have reviewed the proposed development and state the following:

There is no reference to Public Lighting in the current submission

Public Lighting will be required both within the development and along any new footpaths proposed along the Whitechurch Road under this application.

The standard PL condition should apply to this application.

The reports from the Roads Department and Public Lighting Section are noted. The Roads items should be requested **via additional information**.

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Environmental Health

The H.S.E. Environmental Health Officer has reviewed the proposed development and finds it acceptable. This is subject to conditions relating to construction noise and air quality. This report is noted and should be conditioned in the event of a grant of permission.

Screening for Environmental Impact Assessment

Having regard to the nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Screening for Appropriate Assessment

The applicant has submitted an Appropriate Assessment Screening Report. The subject site is not located within nor within close proximity to a European site. **It is considered that additional information in relation to surface water management and the potential watercourse to the east should be provided to assist in screening determination.**

Conclusion

Having regard to the:

- provisions of the South Dublin County Development Plan 2016-2022,
- the established character of the area, and
- the scale, design and standard of the proposed development,

it is considered that **Additional Information** is required, to ensure the proposed development would be in compliance with Council policy, would not seriously injure the amenities of the area or of property in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area.

Recommendation

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. The Planning Authority has concerns in regard to the overall height, form and design of the proposed development and the associated impact on existing residential and visual amenities in the area.

In this regard, the applicant is requested to address the following requirements of the Planning Authority;

- (a) A reduction in the height of the proposed dwellings to a maximum of 3 storeys;
- (b) Reconfiguration of Unit No. 1 and No. 22 to provide a frontage/ entrance onto Whitechurch Road. The proposed boundary treatment along this boundary should be

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revised to provide a privacy strip behind a low wall, hedge or railings until where it meets the rear private amenity space behind the dwellings along this boundary.

(c) Reconsideration of the proposed materials and finishes, having regard predominant building palette in the area especially the neighbouring Protected Structure and the adjoining ACA. A greater variance in materials across elevations (particularly the rear elevations) and house types should also be considered.

A full set of revised drawings should be submitted. This includes a revised proposed site layout that includes proposed site levels.

2. House No. 8's private garden space wraps around the rear and side, and to the front, of the dwelling. The CDP states that private open space should be located behind the front building line of the house and be designed to provide for adequate private amenity. It would also be preferable that this space was more combined for usability. The applicant is requested to submit a revised layout for House No. 8 so that a more combined area of private amenity space is provided behind the front building line of the dwelling.
3. The Planning Authority is concerned that as a result of the proposed development the strip of land to the east with surface water infrastructure would be further isolated and access to it restricted (when required for maintenance). The applicant is requested to consider this strip of land (and the piped stream) in the overall development. It is requested that the nature of this infrastructure, whether it is only a piped stream, is confirmed. The site boundary (red line) should be extended to include this strip of land. The applicant should consider whether appropriate landscaping could be provided along this strip of land (in line with ecological surveys). Dedicated access to this strip of land from the subject site should be provided. An appropriate setback distance of structures from any pipe should be provided. The separation distance of the proposed bicycle store and House No. 8 in particular from the eastern boundary should be reviewed in relation to this.
4. The applicant is requested to submit the following in relation to public realm and landscaping:
 - (a) A fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section including:
 - i. A comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
 - ii. 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. Street Frontage to the Whitechurch Road should to include street trees planting.
 - iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.

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- iv. Revised proposals shall include the provision of additional natural SUDS features to reduce or remove the need for an attenuation tank within the development.
- (b) A comprehensive Tree Report. This shall comprise of a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction - recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:
- i. Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. vegetation contained along the banks of the culverted stream) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
 - ii. Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.
 - iii. Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
 - iv. Design Iteration - Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retention.
 - v. Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
 - vi. Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by color coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities; plant, equipment and materials storage etc. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.
 - vii. Arboricultural Method Statement: clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.
 - viii. Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
 - ix. The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.
 - x. Arborist's name, arboricultural qualifications and contact details.
 - xi. Date that the survey was carried out (surveys > 12 months are unacceptable).
- (c) The current landscape proposal for the development contains a lack of street tree

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planting and is not acceptable to the Public Realm Section. The applicant is requested to submit a revised landscape plan to incorporate additional street trees. Street trees within the development shall be provided fully in Public Areas and not between private or management company driveways. Street Tree Planting shall be located within the Public Realm and include SUDS features. Response should include revised layout and drawings.

(d) A detailed play strategy for the subject site to be submitted, additional details to be provided include:

i. A specification of all play equipment to be installed including provision for children with disabilities and special sensory needs;

ii. A specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas.

(e) An Alien Invasive Plant Species Survey Report for the subject site.

5. (a) The issue of surface water attenuation has been raised as a significant concern for the Public Realm Section. A revised proposal is requested that includes further provision of additional natural above ground SuDS features to reduce or remove the need for an attenuation tank within the development. Further consideration of the breakdown in provision of open space, the location and size of attenuation tank proposed, and the incorporation of additional SuDS measures needs to be carried out. The response should include revised layout and drawings and avoid the use of underground tanks within open space areas where possible. The applicant is referred to the recently published SDCC SuDS Design Guide for further information and guidance. Examples of above ground SuDS to consider include:

Green roofs,

Swales

Tree pits

Permeable Paving

Rain gardens

Channell rills

Water butts

Grasscrete

(b) The applicant is requested to submit a drawing and report to show what SuDS are proposed for the development. Show in m³ what surface water attenuation capacity proposed SuDS systems have.

(c) A comprehensive SuDS Management Plan is requested 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. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

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6. The applicant is requested to submit a report and drawing to clearly show the location of proposed site on an OPW CFRAM Flood map. This will identify the location of site relative to adjacent flood zones if any and determine if any flood risks arise. If there is a risk of flooding such as a 1 in 1,000 year flood risk outline in a report and drawing what flood mitigation measure are proposed for the development. Outline in report what if any flood risk there is for property upstream and downstream of proposed development due to same. Prior to the submission of revised documents the applicant might contact water services of South Dublin County Council to discuss same.
7. The applicant is requested to submit the following information in relation to roads, access and permeability:
 - (a) A full swept path analysis for the proposed development. The analysis shall demonstrate the safe and efficient access and egress of the private vehicles from each dwelling, in particular No. 20,19,18, 17, 8,7 and 6. The applicant is also requested to submit any revised plans that may be required considering the above information.
 - (b) A revised layout not less than 1:100 scale showing the location, design, and construction of an uncontrolled pedestrian crossing from the development to the footpath on the west side of Whitechurch Road, including safety barriers. To be constructed by the applicant/developer and at their own expense.
 - (c) A revised layout not less than 1:100 scale showing the pedestrian routes within the development.
 - (i) The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users.
 - (ii) Footpath layout shall provide adequate connectivity around the development and footpaths on the main road.

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REG. REF. SD22A/0039

LOCATION: Silveracre Bungalow, Whitechurch Road, Rathfarnham, Dublin 14.

Colm Harte

**Colm Harte,
Senior Executive Planner**



**Eoin Burke,
Senior Planner**

ORDER: I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Date:

6/4/22



**Mick Mulhern, Director of Land Use,
Planning & Transportation**