

Planning Department,
South Dublin County Council,
County Hall,
Belgard Square North,
Tallaght,
Co. Dublin.

13th April 2022



FURTHER INFORMATION RESPONSE

APARTMENT DEVELOPMENT AT HAYDEN'S LANE, LUCAN CO DUBLIN.

DLRCC REG. REF:	SD21A/0359
DATE OF REQUEST FOR FURTHER INFORMATION:	24 TH OF JANUARY 2022
FINAL DATE TO RESPOND TO REQUEST:	22 ND OF JULY 2022

Introduction

McGill Planning Limited, 22 Wicklow Street, Dublin 2, is instructed by our client, Jackie Greene Construction Limited, to submit this further information response to the request letter issued by South Dublin County Council.

For convenience, we have listed items requested as they appear in the further information request letter dated 24th of January 2022.

Prior to addressing each of the FI items raised, it is noted that as a result of addressing the concerns raised the quantum and scale of development has been reduced. Specifically the height of Block 3 has been reduced by 1 full storey which brings the scheme down to 66 units in total. **The overall mix has also been changed to 18 no. 1-bed (27%), 45 no. 2-bed (68%) and 3 no. 3-bed (5%).**

A number of other modifications to internal layout, balcony design, elevational treatments, car parking, landscaping, retention of tree, etc are also proposed and elaborated further in the drawings and reports of Oppermann Architects and CSR Landscape Architects primarily.

Further Information Item no. 1

The applicant is requested to revise and provide the following drawings and documents:

- a) A map showing the land use zoning overlapped with the subject site boundary, block and site layouts.***
- b) An updated Design Statement that fully complies with Section 11.2.1 of the South Dublin County Development Plan 2016-2022.***

- c) ***A more comprehensive site layout plan should be submitted, that fully shows the adjacent dwellings on all sides. The site plan should detail the separation distances of the proposed development from the existing buildings.***
- d) ***Correct the labelling of Blocks 2 and 3 across the drawings. Any associated documentation, such as the Housing Quality Assessment, should be updated to ensure all the information is correct. No single aspect, north facing units should be provided.***
- e) ***Clarify if terraces or balconies are being provided at the ground floor levels of Blocks 2 and 3. The Planning Authority would prefer terraces. The drawings may need to be updated in response to this.***
- f) ***Update the Ecological Impact Assessment, Bat Assessment and Appropriate Assessment Screening Report so that they reflect the proposed development.***

Applicants Response

- (a) Please see attached Plan 0004 prepared by Opperman Architects showing the zoning map superimposed on the layout and confirming that all residential buildings are located on the residential zoning.
- (b) Please refer to revised Design Statement prepared by Oppermann Architects.
- (c) Please refer to revised Site Layout Plan prepared by Oppermann Architects.
- (d) Please refer to revised plans and HQA which correct the north point and orientation of units. In relation to north facing, single aspect units, it is noted that there are only 5 such units within the revised design (7.5% of the total units). These are all located within Block 3. Section 3.18 of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)* does not restrict single aspect north facing units but states that they “*may be considered where overlooking a significant amenity such as a public park, garden or formal space.*” In this instance we note that the units will have direct views to the new park proposed in the centre of the development and designed by CSR. Additional communal open spaces are provided whilst direct accessibility from the development to Griffeen Park is also noted. Given the above it is considered the small number of single aspect north facing units proposed, and the attractive disposition of the units in question accords with the Apartment Guidelines and can be permitted.
- (e) Terraces at ground floor are confirmed by Opperman Architects.
- (f) Revised Ecological Assessment, AA Screenings and Bat Assessment are included.

Further Information Item no. 2

The Planning Authority has concerns in regard to the subject site's ability to support a proposed density of 68 units per ha (gross)/85 units per ha (net). The Planning Authority considers that the site does not have appropriate access to existing public transport and local facilities and services to support the proposed density. The Planning Authority has concerns that the site is not located within a reasonable and useable walking distance of a town or suburban centre, employment location or high frequency public transport. Some existing routes are also not considered appropriate. The overall limited access to public transport services is a concern. The applicant is requested to submit a revised proposal with a reduced density more appropriate to the site's context.

Applicants Response

In response it is noted that the quantum of residential development proposed has been reduced by 11% to 66 units. The density of the development therefore also reduces to 60 units per ha gross / 75 net.

We refer again to the *Sustainable Urban Housing: Design Standards for New Apartments (2020)* and refer to Section 2.4 which defines 3 locational topologies for considering higher density apartment development.

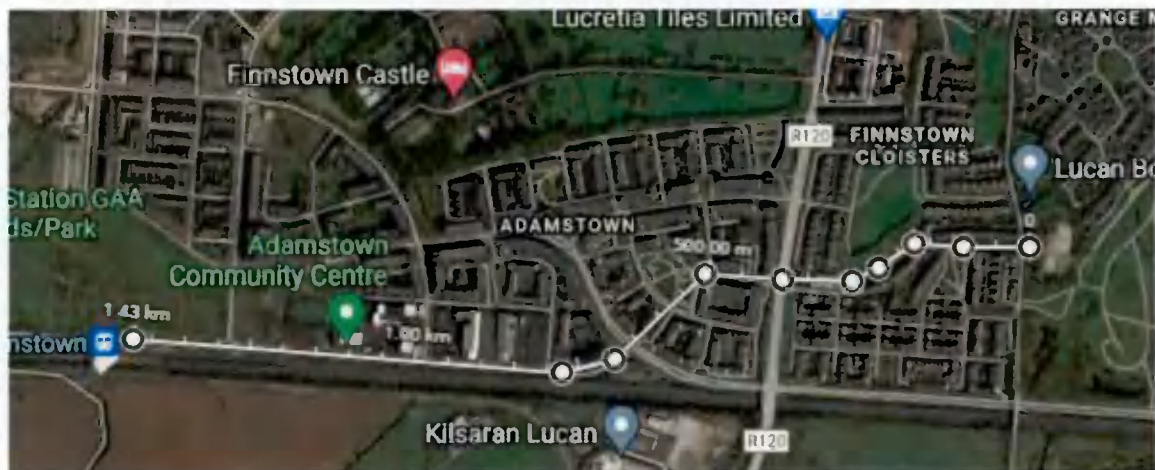
Intermediate Urban Locations are identified as follows:

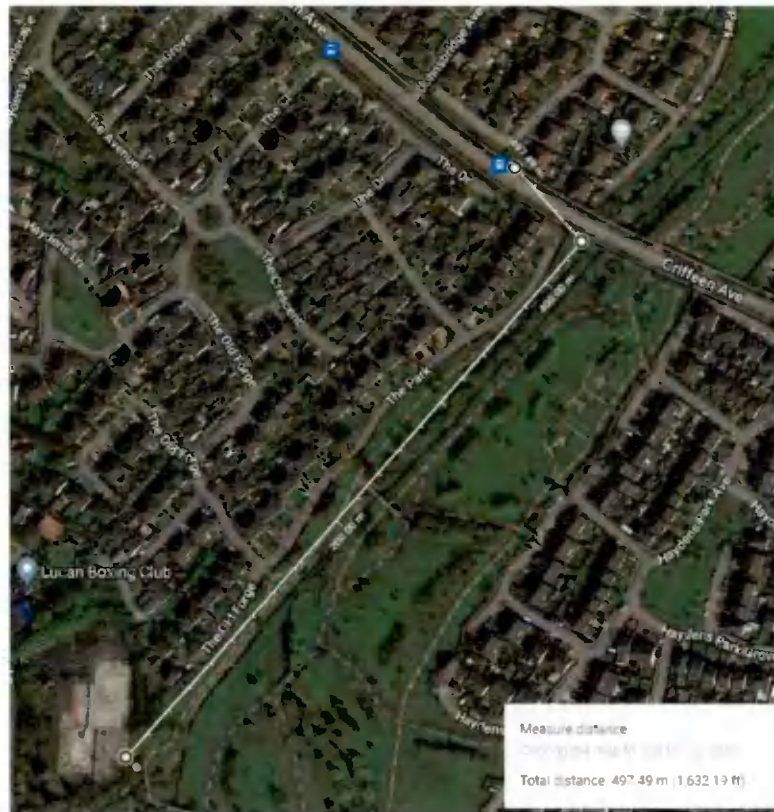
*Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, **medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net), including:***

- *Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;*
- *Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.*

The range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

In this regard we note that the subject site will be accessible to Adamstown train station to the west and a number of bus routes in the area and in particular the C1 route between Adamstown and Sandymount via the city centre with frequency every 15 mins at peak. These are mapped out using Google Maps on the images below.





Access to the bus services along Griffeen Avenue will be via the Griffeen Valley Park with direct access from the site. This is considered a very safe and attractive route for residents and increased use of the park in this way has increased benefits for the overall utility of the park.

It was noted in the SDCC Planner's Report that the park at present has *"limited lighting to make this a safe and easy route at all times."* Whilst this may be the case we note that Policy TM3 Objective 4 of the Development Plan seeks *"to prioritise the upgrade of footpaths, public lighting & public realm maintenance and supporting signage on public roads/paths where a demonstrated need exists for busy routes used by runners & walkers."* The Valley Park also includes one of the Strategic Cycle Network Green Routes identified in the Development Plan and is clearly supported for additional patronage and use including to/from public transport.

In order to improve the useability of the Griffeen Park as a route to public transport at all times, the applicant would be happy to agree by condition to agree to contribute towards the cost of public lighting upgrade in this regard.

In relation to connection to the Adamstown train station to the west and indeed other services such as childcare and retail within 500m-1km distance, access from Hayden's Lane is available via an existing kissing gate at Hansted Close to the south-west.

It was also noted by the applicant that works appear to have commenced on creating a new pedestrian access to Hansted Park directly opposite the site at Hayden's Lane.

Presumably these works are being carried out in accordance with the Local Permeability Improvement Measures outlined in Section 6.3.2 of the Development Plan to optimise access to Griffeen Park from the Hansted estates.

The proposed development at the subject site can complement local permeability improvement measures and we note the inclusion of a new footpath along the site boundary with Hayden's Lane. The current site layout also indicates a dedicated pedestrian crossing across Hayden's Lane to the emerging Hansted Park pedestrian access.

Such measures will further improve accessibility to public transport and services to the west for future residents of the proposed development.

Given the above it is considered that the accessibility to public transport and local services from the proposed development justifies the revised density now proposed and is considered in accordance with the S28 national guidelines and with SDCC Development Plan policy, particularly Policy H8 Objective 1 which states:

"To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009)."

Further Information Item no. 3

The Planning Authority has serious concerns in relation to the potential impact of the proposed development on existing residential development within the vicinity. The proposed heights in proximity to existing residential development is not acceptable, in particular Blocks 2 and 3. A further setback or reduction in height of Block 2, in relation to dwellings to the east at The Old Forge, should be considered. Block 3 due to its height, design and proximity would have an unacceptable overbearing and overlooking impact on existing dwellings to the east on Hayden's Lane. There is also the potential for overshadowing impacts. The applicant is requested to revise Blocks 2 and 3 to address these concerns. This might involve setting Block 2 further back from residential development at the Old Forge. Block 3 should be significantly further setback and/or reduced in height from residential development at Hayden's Lane. A daylight, sunlight and overshadowing analysis of the proposed development and its impact on existing development should be submitted.

Applicants Response

We note the proposed reduction in height to Block 3 which will improve the relationship to Hayden's Lane. Upon further inspection of distances to properties and development of cross sections, photomontages, shadow assessments, and by making a number of changes to the positioning and orientation of windows and balconies, it was considered that the positioning and transition in height of Block 2 is acceptable and will not unduly impact residential properties to the west.

We refer to the additional reports and surveys in this regard submitted the application which demonstrates in a variety of ways the acceptability of the revised scheme in terms of existing and future residential and visual amenity.

Further Information Item no. 4

In terms of the proposed layout of the development the following should be addressed:

- a) *At the closest point Blocks 2 and 3 would be approx. 9.0 m from each other. While it is noted these buildings are at different angles, there could still be a potential for overlooking between the blocks. The applicant is requested to submit a revised proposal addressing this.*
- b) *Omit any single aspect, north facing units.*
- c) *Omit, reduce or relocate the surface car parking spaces around the central eastern area of public open space.*

Applicants Response

- a) Directly opposing habitable room windows are avoided between Blocks 2 and 3 where the blocks run closer together. At the southern end the distance between blocks extends to 22 – 27m at this point living room windows and balconies can be achieved and provide attractive views over the Park.
- b) In relation to north facing, single aspect units, it is noted that there are only 5 such units within the revised design (7.5% of the total units). These are all located within Block 3. Section 3.18 of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)* does not restrict single aspect north facing units but states that they “*may be considered where overlooking a significant amenity such as a public park, garden or formal space.*” In this instance we note that the units will have direct views to the new park proposed in the centre of the development and designed by CSR. Additional communal open spaces are provided whilst direct accessibility from the development to Griffeen Park is also noted. Given the above it is considered the small number of single aspect north facing units proposed, and the attractive disposition of the units in question accords with the Apartment Guidelines and can be permitted.
- c) A number of parking spaces have been removed to reduce the overall total to 44. Additional landscaping is proposed between spaces.

Further Information Item no. 5

No analysis of the proposed development in relation to the Childcare Facilities Guidelines for Planning Authorities (2001) has been provided. The applicant is requested to submit an analysis of the potential childcare demand from the proposed development and how this would be addressed.

Applicants Response

Please refer to the Creche Assessment attached.

Further Information Item no. 6

The proposed blocks are considered to be bulky and monolithic. The variation in height and materials is welcome, however, it not considered to go far enough for the proposal to be acceptable visually. In line with the requested amendments in relation to density and impact on residential amenity, the applicant is requested to revise the design of the buildings to reduce their bulk and monolithic appearance. Photomontages and CGIs of the proposed development should be submitted. These should include views from Hayden’s Lane, surrounding residential estates and the adjoining public park.

Applicants Response

A variety of amendments to the elevational design is proposed as shown on the drawings, described in the Design Report and illustrated in the photomontages and CGIs now submitted.

Further Information Item no. 7

SDCC's Public Realm Section request the following additional information:

- a) **A revised and fully detailed landscape plan, proposals and details that addresses the main concerns outlined above, i.e.**
 - (i) **Retention of the mature willow tree (T013) with bat roost potential. Appropriate measures such as no dig solutions and/or revised path layout to be proposed. It is important that every effort is made to retain as much of the existing mature planting.**
 - (ii) **Incorporation of additional street trees within the car parking areas to break up hardstanding. SDCC require street trees every 5 perpendicular car park spaces.**
 - (iii) **SuDS bioretention Tree pits to be installed in trees within /draining areas of hard standing. Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to contact Public Realm section for tree pit details and refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'.**
 - (iv) **Landscaping details of the conveyance swale referred to on Drainage Drawings to be included in the landscape plans. This swale should also act as an attenuation feature, holding water back close to where it falls and creating opportunity for habitat. Planting proposals are required, for example, riparian wildflowers.**
 - (v) **Planting plan and section through southern attenuation swale showing profile and planting on southern side for safety reasons. Refer, 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022'.**
 - (vi) **Proposed external lighting to ensure there is no conflict with proposed tree planting and light is not cast onto areas of ecological sensitivity.**
 - (vii) **Removal of the proposed timber post and rail fence along the southern boundary of the site with the Parkland and removal of the proposed fencing alongside the perimeter dry ditch to allow access for maintenance.**
- b) **In relation to bridge design, detail including section of the proposed crossing of the water feature. This is indicated as an earth bank in the landscape plan and as a bridge in the cross-section on page 11 of the Landscape Rationale. Although SDCC do not normally fence off watercourses in Parkland, the proposed flat bar metal railing boundary treatment could continue beyond the site access to the site for a short stretch along the water feature where it interfaces with the public open space to create an access feature.**
- c) **Detailed lighting proposals are required that comply with the recommendations of the Bat Eco Services Bat Assessment (2021) who has highlighted this element of the application as an important aspect in relation to local bat populations.**
- d) **Detailed play proposals should include accessible play features. The following is requested:**

- (i) **An accessible play feature - the proposed carousel could be replaced with an accessible carousel.**
- (ii) **Tree trunks to be seasoned hardwood, logs to be branched and minimum 4m long**
- (iii) **Large (1 tonne) boulders to be placed flat-side up to enable play**
- (iv) **Engineered wood chip is the preferred safety surface for natural play areas.**
- (v) **Details of play proposals to be agreed with Public Realm.**
- (vi) **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. It is noted that post installation certification by the Register of Play Inspectors International (RPII) will also be a requirement for all play areas.**

Applicants Response

Please refer to the Response Letter and revised drawings prepared by CSR Landscape Architects.

Further Information Item no. 8

SDCC's Roads Department requests the following additional information:

- a) **In line with the requested amendments to density the applicant is requested to submit a revised car parking strategy. This should provide for a higher car parking ratio than proposed. Please refer to Table 11.23: Maximum Parking Rates (Residential) – from the South Dublin County Development Plan 2016-2022.**
- b) **Taking in Charge maps as per SDCC's Appendix 6 of the TIC standards.**
- c) **A revised layout showing a pedestrian access to Hansted estate and pedestrian crossing point to the footpath on the west side of Hayden's Lane.**
- d) **A revised/updated traffic impact assessment highlighting the Hayden's Lane/Old Forge junction and the Griffen Avenue roundabout junction.**

Applicants Response

Please refer to the Response Letter prepared by TPS Consulting Engineers. A total of 44 spaces is now proposed for 66 units which equates to 0.66 spaces per unit and is considered acceptable for this location and type of development. In relation to item (b) please see attached Taking In Charge Dwg. 0103 prepared by Oppermann Architects.

Further Information Item no. 9

The H.S.E. Environmental Health Officer requests the following:

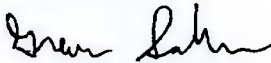
- a) **A noise impact assessment, carried out by appropriately qualified acoustician and competent persons, must be submitted in order to assess the potential impact of environmental noise from traffic on Hayden's Lane if the proposed development is completed.**
- b) **In addition the proposed noise assessment must assess if noise from the nearby train line will impact on the proposed development. Where deemed necessary a statement outlining recommended acoustic control measures that should be incorporated into the design and construction of the proposed residential units and/or site to ensure against adverse noise impacts on the occupiers must be included.**

- c) ***The South Dublin County Council Environmental Noise Action Plan 2018 – 2023 recommends that the noise impact assessment should demonstrate that all facets of the UK 'Professional Practice Guidance on Planning & Noise' (2017) (ProPG) have been followed.***

Applicants Response

See attached acoustic report prepared by Amplitude Acoustics.

Yours sincerely,



McGill Planning Limited,
01 2846464
Trevor@mcgplanning.ie

LIST OF ENCLOSURES

6 no. copies of the following documents/drawings:

- Creche Assessment prepared by McGill Planning.
- Traffic Report prepared by TPS Consulting Engineers.
- Planning Stage Acoustic Design Statement prepared by Amplitude Acoustics.
- Sunlight, Daylight & Shadow Assessment prepared by Chris Shackleton Consulting.
- Visual Impact Photomontages prepared by James Horan Architectural Illustration.
- Ecological Impact Assessment and AA screening Report prepared by Altermar Ecologists.
- Bat Assessment prepared by Bat Eco Services.
- Engineering Planning Drainage/Water Services Report and Flood Risk Assessment and Drawings (See Schedule) prepared by Roger Mullarkey Consulting Engineer.
- Response Cover Letter, Tree Survey and Drawings (See Schedule) prepared by CSR Landscape Architects
- Architects Design Statement and Drawings (See Schedule) prepared by Oppermann Associates