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Our ref. D1194

Senior Administrative Officer,  
Planning Department,  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24



6<sup>th</sup> May 2022

**ADDITIONAL INFORMATION**

**Re: Planning application for 8 no. 2 storey dwellings on infill site on lands at Palmyra, Whitechurch Road, with vehicular and pedestrian access from Grangebrook Avenue, Rathfarnham, Dublin 16.**

**Applicant: Beckett Developments Ltd.**

**Reg. Ref. SD21A/0246**

Dear Sir/Madam,

We refer to the above planning application and in particular to the request for Additional Information dated 28<sup>th</sup> October 2021 and in this regard and on behalf of the applicant, we respond to all the points raised as follows:

**Point 1**

***“The applicant has submitted a site layout plan showing the area taken in charge by South Dublin County Council. This appears to overlap with the subject site along the western boundary. However, no letter of consent has been submitted with the application from South***

***Dublin County Council for these works. The applicant is requested to submit a letter of consent from South Dublin County Council for works on land in control of the Council”***

#### **Response**

Enclosed is the letter of consent dated 23<sup>rd</sup> November 2021 from South Dublin County Council for works on land in control of the Council.

#### **Point 2**

***“The development would provide for the demolition of 2 existing structures onsite, a small greenhouse and a single storey structure. The single storey structure is located in the southern part of the site. The applicant is requested to clarify what this single storey structure is used for. Elevations and floor plans of the structure for demolition should be submitted “***

#### **Response**

The single storey structure located in the southern part of the site is a derelict garden shed. Enclosed are elevations and plan of this structure. Drawing number: D1194-3-01

#### **Point 3.**

***“The Planning Authority has concerns in regard to the proposed development’s impact on existing residential and visual amenity. While the proposal is largely acceptable in principle, design changes are advised to help it better integrate with the surrounding built form. This includes a reduction in the scale of House Nos. 7 and 8 given its proximity and scale compared to existing residential development. The proposed materials are also noted as being of a different colour (brick) and could be designed to reflect the materials on existing dwellings. The applicant has submitted CGI images of the proposed development; however, these focus on the proposed houses rather than how they sit in the wider context of the area. The applicant is requested to submit CGIs/photomontages of the proposed development from further back along Grangebrook Avenue and showing more of the context of the existing estate. The applicant is also requested to submit a Design Rationale to take account of the collection of historic structures/protected structure sites within the vicinity and the streetscape setting and character of the area”***

#### **Response**

House no’s 7 and 8 have now been changed to a pair of 3 bed 2 storey semi-detached from the previously proposed pair of 4 bed 2 storey semi-detached. These amended proposals results in a reduction in scale, massing and footprint more comparable to the existing residential development as sought by the Planning Authority. The new house type for sites 7 & 8 is indicated on the enclosed amended site layouts and house Type C, drawing numbers: D1194-2-

13, D1194-2-14 and D1194-2-15 in addition to the enclosed contiguous street elevation previous and proposed comparison drawing no. D1194-2-18a

The above amendments other than the change of house type are also applied to the 4 bed 2 storey semi-detached houses on sites 3, 4, 5 & 6 so as to maintain consistency on design, finishes, height and massing. Amended drawings for house Type A are enclosed as follows, D1194-2-10, D1194-2-11 and D1194-2-12.

The proposed materials and colours have been amended to reflect and harmonise with that of the existing dwellings.

Enclosed are amended / additional CGIs / Photomontages of the proposed development as amended as a result of the request for additional information, in the following context:

- Proposed re-designed houses in street view context, drawing number: D1194-2-35
- Proposed re-designed development from further back along Grangebrook Avenue and showing more of the context of the existing estate, drawing number: D1194-2-35
- Enclosed is a Design Rationale which takes account of the collection of historic structures / protected structure sites within the vicinity and the streetscape setting and character of the area.

#### **Point 4.**

***“There is a current application for an extension to the existing house at Palmyra which is currently at further information stage (Reg. Ref. SD21B/0372). House No. 2 would be located approx. 17.4m to 18.9m from the proposed extension at Palmyra. The proposed houses would be located at a higher ground level than the house at Palmyra. A site section has been submitted showing separation distances between the proposed House No. 2 and Palmyra, however, this does not include the proposed extension to Palmyra. A revised Typical Site Section C-C drawing should be submitted showing the extent of the proposed extension for Palmyra currently under consideration”***

#### **Response**

Enclosed is a revised typical site Section C-C drawing number: D1194-2-20 showing the extent of the new approved extension for Palmyra reg. ref.: SD21B/0372. The route of the typical site section C-C is indicated by pink line on the enclosed site layout drawing number: D1194-02-03

#### **Point 5.**

***“The submitted boundary treatment drawing shows a 2.0 m high blockwork wall along the boundary of the adjacent 19th century burial site. The Planning Authority has concerns in***

***regard to the replacement of the existing boundary with the 19th century burial site. The applicant is requested to leave the boundary as existing along this adjoining site. A revised boundary treatment drawing should be submitted”***

#### **Response**

Enclosed is a revised boundary treatment drawing no. D1194-2-19 which indicates the existing boundary with 19<sup>th</sup> century burial site left in situ.

#### **Point 6.**

***“The Planning Authority has concerns in regard to the usability of the private open space, in the form of rear gardens, and the lack of public open space. The site is sloping, and it is not clear from the application material whether the rear gardens would slope. Further detail is required in regard to this and to the usability of these spaces. The applicant is requested to submit proposed site sections and a proposed site plan with contours demonstrating the usability of the rear gardens. In regard to public open space the applicant is requested to submit a revised proposal demonstrating how the proposed development compiles with the public open space requirements of the South Dublin County Development Plan 2016-2022 and to provide public open space for the proposed development. Dwellings should be revised accordingly and surveillance provided of such public open space”***

#### **Response**

Enclosed are proposed site sections and a proposed site plan with contours demonstrating the usability of the rear gardens.

Site section – House No. 1. Drawing: D1194-2-21  
Site section – House No. 2. Drawing: D1194-2-20  
Site section – House No. 3 & 4. Drawing: D1194-2-22  
Site section – House No. 5 & 6. Drawing: D1194-2-23  
Site section – House No. 7 & 8. Drawing: D1194-2-24  
Proposed site plan with contours: Drawing: D1194-2-30

Regarding public open space provision. Reference was made in the Planning and Design statement that accompanied the planning application under the paragraph headed “Open Spaces”, as follows: “As this site is infill, is of c.0.226 ha. and the proposal is for eight dwellings the provision of Class 1 or 2 Public Open Space is not proposed. The applicant is therefore agreeable to the enhancement of the existing open spaces and green infrastructure that the proposed development will benefit from by means of a financial contribution”

Notwithstanding the Planning Authorities request to submit a revised proposal demonstrating how the proposed development complies with the public open space requirements, it is also

noted that the provision relating to infill residential development allow for reduced open space standards be considered subject to appropriate safeguards to protect residential amenity.

In support of the applicant's proposal referred to above, a financial contribution, we would refer to the high quality and accessible open spaces within the Grangebrook Estate. Please refer to the enclosed drawing no.: D1194-2-31 which indicates the location of the three large areas of public open space located within walking distances of the proposed infill site.

Importantly, this proposal will significantly improve the public realm along the frontage of the site because the existing site boundary wall, which extends in length of approximately 90 meters will be removed and the grass verge with new footpath and existing mature street trees become higher quality and more visible.

Taking into consideration the quality and quantum of private open space provided with this infill development and the close proximity of the public open spaces within Grangebrook Estate we are satisfied that, combined with the other amendments proposed in response to the additional information request that appropriate safeguards to protect the existing and proposed residential amenity have been adhered to.

The applicant's original proposal of a financial contribution should be considered appropriate for the reasons outlined above.

#### **Point 7.**

***“The SDCC Public Realm Section has concerns in regard to the impact on existing trees and the lack of information in regard to landscape and SUDS. The applicant is requested to submit the following information:***

***(a) A fully detailed landscaping scheme for the proposed development. The applicant should provide a landscape rationale and a fully detailed landscape plan including Sections and Elevations and a full works specification that accords with the specifications and requirements of the Council's Public Realm Section.***

***(b) The impact of the proposed development on the existing trees contained within the development site is not acceptable to the Public Realm Section, and would contravene Council policy. The current proposal will have a negative impact on existing trees within the development site area. The proposed development will require the removal of 58 no. trees, three groups of trees and the part removal of two groups of trees. A response should be submitted including a revised layout to significantly reduce the impact of the proposed development on the existing mature trees, especially those trees located along the western boundary which are proposed to be removed.***

***(c) The Public Realm Section consider that the proposed development is contrary to Policy G5 - Sustainable Urban Drainage Systems and Objective G5 1 and G5 2 in the County Development Plan. The applicant should be requested to:***

***(1) Revisit the design and layout of the proposed development and demonstrate how the development will comply with these policies and objectives in a separate report.***

***(2) Submit revised plans and particulars addressing the above item and to include the following: i. Significantly reduce the impacts of the development on existing green infrastructure especially the mature boundary trees within the proposed development site.***

***ii. Demonstrate how natural SUDS features can be incorporated into the design of the proposed development.***

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

***(d) A comprehensive SUDS Management Plan should 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 should also be included as a demonstration of how the system will function following implementation. Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits. In addition, the applicant should provide the following:***

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

***(2) Street Trees shall be planted in public open space with suitable tree pits that incorporates SUDS features in accordance with SDCC Adamstown Street Design Guide, Section 6.3 Side Street Design.***

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

## **Response**

a) A fully detailed landscaping scheme and specification for the proposed development (prepared by Landmark Designs Ltd.) was submitted with the original planning application. The proposed plan included 28 no. new trees of which a number of new semi mature trees are to be provided in the rear gardens of all new properties thereby supplementing any loss of existing vegetation and therefore no change is proposed to the layout as previously submitted.

b) There are 14 category ‘B’ trees, trees of moderate quality with a life expectancy of at least 20 years (located within the application red line boundary). The location of these trees are indicated on the previously submitted tree survey prepared by Charles McCorkell.

Of the 14 category ‘B’ trees, 6 are located in the public realm, however there are 3 additional trees (category C & U) within the public realm that will not be interfered with resulting in 9 street trees been retained. These trees are indicated on boundary treatment drawing no. D1194-2-19, as follows T749, T750, T751, T752, T753, T754, T755, T757

and T758. It is also proposed to retain tree number T676 located in the rear garden of house number 3.

The proposed development would result in the retention of 10 trees in total and the loss of 7 category 'B' trees (trees of moderate quality) from a total of 14, all other trees proposed to be removed are of low/ poor quality. The tree groups proposed to be removed in whole/ part are classed as fair/ good but do not contain any quality specimens.

No quality specimen trees are being removed as a result of the proposed development. The application site forms part of the Palmyra grounds curtilage in which there are a significant number of existing trees including trees of high quality, all of which are being retained.

Consideration must also be given to the provision of new planting proposed throughout the development which alleviate any adverse impact from any tree loss as a result of the proposed development.

- c) The proposal is an infill site of limited area and the responses above in addition to the response to Point 9 address SUDS requirements and policies for development in restrictive infill sites.
- d) 1, 2 & 3. Again, the response to point 9 addresses SUDS requirements and policies for developments on restrictive infill sites.

#### **Point 8.**

***“The SDCC Roads Department requests that the applicant submit the following:***

- (a) Dimensioned drawing showing widths for proposed new footpath, and grass verge.***
- (b) Detail whether new boundary wall is set back.***
- (c) Detail how footpath will continue past the electricity unit, and the steps leading to it.***
- (d) Detail required showing if any proposed entrances front onto traffic calming ramp.***
- (e) Detail how existing southern footpath links fully with new northern section of path”***

#### **Response**

Enclosed is drawing number D1194-2-32 indicating the following:

- a) Dimensions of widths of proposed footpath and grass verge.
- b) Comparison detail of existing 2m high boundary wall location to proposed new front boundary railings/ piers locations.

- c) Details of how the new footpath will continue past the ESB sub station are indicated on the enclosed drawing no. D1194-2-32. It is the applicant's intention to remove the raised area to the front of the ESB sub station and link the proposed footpath to the existing estate footpath to the north.

The applicant will consult with the ESB networks and South Dublin County Council, Roads Department to agree and confirm exact details prior to commencement of these works.

- d) The traffic calming ramp is coloured orange on the enclosed drawing D1194-2-32. None of the proposed entrances front onto the traffic calming ramp.
- e) Details of how existing southern footpath links fully with new northern section of footpaths are indicated on the attached drawing no. D1194-2-32. The existing section of southern footpath to be removed from points A to B. Existing footpath will link with the proposed footpath at point B.

#### Point 9.

***"The SDCC Water Services Department requests that the applicant submit the following:***

***(a) A report showing site specific soil percolation test results and design calculations for the proposed soakaways in accordance with BRE Digest 365 – Soakaway Design.***

***(b) A revised surface water drainage layout drawing showing plan & cross-sectional views, dimensions, and location of proposed soakaways. Any proposed soakaway shall be located fully within the curtilage of the property and shall be:***

***i) At least 5m from any building, public sewer, road boundary or structure.***

***ii) Generally, not within 3m of the boundary of the adjoining property.***

***iii) Not in such a position that the ground below foundations is likely to be adversely affected.***

***iv) 10m from any sewage treatment percolation area and from any watercourse / floodplain.***

***v) Soakaways must include an overflow connection to the surface water drainage network"***

#### Response

Please refer to 'Environmental Services report - Surface water disposal/ treatment design' enclosed with this submission, which addresses this point.

#### Point 10.

***"There is no flood risk assessment submitted for the proposed development. The applicant is requested to submit a site-specific flood risk assessment report for the development in compliance with OPW Flood Risk Management Guidelines for Planning Authorities. The***



*report shall outline the location of the proposed development in relation to any adjacent known flood plains and shall outline details of the measures and design features to prevent/mitigate the risk of flooding to the proposed development and to adjoining lands. Finished floor levels shall be above the closest known 1 in 100 year river flood level data point with appropriate freeboard”*

**Response**

Enclosed is a flood risk assessment for the proposed development. The report confirms that there is no risk of flooding of the proposed development and that the proposed finish floor levels do not require to be amended.

**Point 11.**

*“If necessary, the AA Screening and Natura Impact Statement should be reviewed in light of any revisions to the proposed development as part of additional information”*

**Response**

Having compared the development as amended by the request for additional information to the development as lodged in the first instance, we are satisfied that no significant variations occur.

We are therefore satisfied that a review of the AA Screening and Natura Impact Statement is not necessary.

This concludes the applicant’s response to the request for additional information. Six copies of all drawings and documentation are enclosed as per the drawing/ documentation list.

Yours Faithfully,

  
For and on behalf of Terry & O'Flanagan Ltd.

