

Michael Mulhern
Director of Land Use, Planning & Transportation,
South Dublin County Council,
Town Centre,
Tallaght,
Dublin 24

11/05/2022

Re: Lands south of Taylor's Lane within the curtilage of Newbrook House.
File: SD21a/0232

AKM Design
Unit 6
Kingswood Business Centre
4075 Kingswood Road
Citywest Business Campus
Dublin 24
D24 A068

P: +353 1 479 6234
E: info@akmdesign.ie
W: www.akmdesign.ie

Dear Director,

I act as planning consultant on behalf of the applicants Luxcare Limited in this planning matter. The lead agents are Holmes Miller Architects of 89, Minerva Street, Glasgow, Scotland, G38LE.

The proposed nursing home is considered a community asset and is a major planning gain for the local community.

I ask you to consider my planning comments in relation to the request for clarification of additional information requested under SD21A/0232.

We respectfully request that planning permission be granted for the project subject to conditions.

Item no. 1 - Exemption from Part 5

The number of dwellings has been reduced on site. We seek an exemption from Part 5 from Section 96 of the Planning and Development Act given the number of dwellings has been reduced to 4 dwellings. Please see enclosed S96 Exemption Application for the applicants. We ask the planning authority to grant an exemption from Part 5 to the applicants.

Item no. 2 – Public Open Space

The proposed public open space provided complies with the South Dublin County Council Development Plan minimum 10% requirement for public open space. There is a clear hierarchy and network of high quality public open space provided that will enhance the visual character of the site that has unfortunately laid vacant for a very long period of time. The main public open space includes a landscaped area with swale directly connected to the rear of Newbrook House and the nursing home. The landscaped swale area follows the historic alignment of the former mill race on the site. This main feature of public open space is entirely appropriate from a conservation perspective and is fully in line with the South Dublin County Council SuDS Explanatory, Design and Evaluation Guide 2022.

The proposed public open space network consists of the following connected elements:

- Main public open space is located to the rear of Newbrook House. This public open space includes a walkway and directly connects to the semi-private nursing home open space to the east. This area of public open space is 560m² (OS1).
- The public open space at the front of the proposed dwellings was created by reducing the number of dwellings on site and reorienting the layout. This public open space is 146m² (OS2).
- There is an area of semi-private open space to the rear of the nursing home. This open space needs to be enclosed for safety given the nursing home use. This open space is 684m² (OS3).
- Landscaped inner courtyard. This semi-private open space is 434m² (OS4).
- There are other areas of landscaping along front and side of nursing home. This open space is 394m² (OS5).
- There are also Incidental areas of public open space (tree planting adjoining new parking and road verge). This open space is 186m².

We ask the planning authority to consider that the proposed development has a low site coverage. We note that 42% (2662m²) of the total site (6355m²) is proposed as public open space or semi-private open space for the nursing home. The quantum of open space provided exceeds the South Dublin Development Plan requirement.

Public open space has been incorporated as an integral part of the design of the development. The site area is 6355m² and if we only consider the public open space at OS1 and OS2 - the quantum of public open space provided exceeds the minimum 10% requirement. The quantities of public open space are set out in table format on drawing 4801-HML-ZZ-ZZ-DR-A-10300.

We ask the planning authority to accept the quantum of public open space provided is acceptable and is in compliance with the South Dublin County Council Development Plan. Also, we ask the planning authority to concur that the site is located in close proximity and within walking distance (1km) to adjoining public parks including St Enda's historic park and Marley Park.

Item no. 3 – Improved Visibility (a)

A small portion of the boundary wall shall be lowered to improve sightlines onto Taylors Lane looking west from the site. The sightlines lines are improved by reducing the height of the wall to 900mm. We ask the Roads Department to accept this amendment fully meets their visibility splay requirements. Please see enclosed drawing 4801-HML-XX-00-DR-A-12001.

We have liaised with the South Dublin County Council Conservation officer. The proposal benefits the protected structure, and the works shall be carried out under the supervision of Holmes Miller who are highly qualified and experienced conservation architects.

The alignment of the boundary wall shall remain fully in place and the stone from the wall can reused on site as part of the project. The wall shall be lowered and finished to match the existing wall. We ask the planning authority to accept the proposed unobstructed visibility splay provided to the western boundary is acceptable and is fully in compliance with the South Dublin County Council request.

Item no. 3 – Revised Car Parking (b)

The car parking layout is revised to improve functionality and enhance ease of access/egress. The car parking spaces, and road layout ensures 6 metres is provided to ensure safe reversing manoeuvres. A

hammerhead turning area is provided. This revised layout is optimal from road safety and parking perspective.

The car parking spaces, and road layout have been fully auto tracked for emergency vehicles, refuse, fire access and car parking. Please see enclosed drawings 21-3406-C-SK-050-C, 21-3406-C-SK-051-C, 21-3406-C-SK-052-C, 21-3406-C-SK-053-C.

We ask the planning authority to concur the proposed car parking and road layout for the nursing home and 4 dwellings is acceptable and is in compliance with the Sections 11.4.2, 11.4.4 of South Dublin County Council Development Plan.

Item no. 4 - Catchment Areas (a)

I confirm the design team engaged with Brian Harkin, Colin Bolger and Ronan Harkin of South Dublin County Council Water Services and had a meeting 01/03/2022. It was agreed to meet on site and carry out an extensive CCTV drainage survey of the site and surrounding areas. The applicant engaged the Tank Pipe and Drain company to conduct the survey on the 29/03/2022 and 30/03/2022.

Following the CCTV survey, IE consultants have prepared a detailed Hydrological Assessment of the Former Millrace. Please see the enclosed Cowal Design Consultants Drainage Impact Assessment Report with Technical Notes from IE Water Consultants that fully details catchment information. The catchment areas are verified and as a precautionary principle we have assessed the potential worse case scenarios for our surface water drainage network design.

All adjoining catchment areas that flow into the former watercourse / millrace have been taken into consideration for attenuation calculations. Any of the surface water generated from areas to the West and Southwest of proposed development include 25 to 32 Palmers Park and the new primary health care centre (SD13A/0222) Southwest of our site and St Augustines.

The surface water design consists of sub catchments to maximise treatment and storage capacity. Cowal Design Consultants have prepared a surface water assessment that surcharges the swale system to determine the maximum surface water flow capacity. The proposed design is capable of containing a Surface Water flow Rate of up to 162.1 Litres/Second under surcharged conditions without on-site flooding issues occurring.

Item no. 4 - Water Flow (b)

The Pipe Tank and Drain Company conducted extensive CCTV survey of the surface water sewers of site and surrounding local area and the full details of the CCTV survey are included in this submission and are offered for review.

There is evidence of blockages due to heavy root growth and no connection could be verified by survey of the site using CCTV to the lands to the west. A dye test was conducted, and it is confirmed there is still a link between subject site and the lands to the west. Please see enclosed dye test photos in the Cowal Design Consultants Report and we ask the planning authority to refer to comments in the Technical Note no. 2 Hydrological Assessment of Former Mill Race Channel by IE Consulting.

The applicant has undertaken a detailed investigation of the catchment upstream of the subject site to fully determine a worst case scenario storm event for water flow. Please see page 10 of the

Technical Note no. 2 - The mill race maximum rate of water flow is determined to be (50.6 litres per second) based on the full assessment of the surrounding catchment areas in a worst case scenario during a 1 in 100 year storm event plus climate change.

The Cowal Drainage Assessment Impact Report conclusion calculates the predevelopment run off discharging upstream to be 41.05 litres per second based on hardstanding area only. The proposal shall limit surface water run-off from the developments through the use of Sustainable Urban Drainage Systems (SuDS). The proposed surface water run off shall be restricted from the site.

Item no. 4 – Surface Water Attenuation (c)

The site is 0.6 hectares. See enclosed Cowal Design Consultants report that provides full details of surface water attenuation and micro drainage calculations for the site. The Cowal report shows the surface water attenuation and runoff calculations for each catchment area being attenuated on site. The enclosed Cowal drainage plans and Cowal Drainage Report details catchment areas, areas of buildings, green roofs, roads, pathways, permeable paving and grass in m². The total storage volume provided is 296.793m³ (page 17 Micro drainage report).

Item no. 4 – Sustainable Drainage Systems (d)

The disposal of surface water conforms with the technical requirements of the Water Services Section. The overall SuDS strategy for the proposed development takes account of quantity, quality, and amenity issues and maintenance issues.

A range of SuDS measures are provided as part of the proposed development and a series of sub catchments to maximise treatment and storage capacity. The strategy includes Permeable Paving, Swale, 2 no. separate areas of Stormbloc system and Filter drains:

Swale

The proposed swale is located within the open space to the south of the nursing home. It follows the general alignment of the redundant mill race.

Stormbloc System

These are modular storm water / infiltration systems. These cellular block type structures are used predominantly for providing below ground storage, attenuation and infiltration at the inner courtyard and the front of the site.

Permeable Paving

Permeable paving is provided to the car parking areas at Newbrook House and at the parking for the dwellings.

Filter Drains

There are road side filter drains proposed at the eastern portion of the site adjoining the garage.

Maintenance

Please see page 14 of the enclosed Cowal Drainage Report Section 8.0.

Conclusions

The applicant has fully responded to the requests for clarification of additional information by the planning authority.

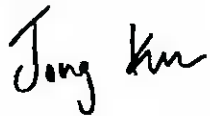
The applicant engaged with Water Services Department and conducted a comprehensive CCTV survey of the site and surrounding surface water drainage network to determine catchment. The proposal shall limit surface water run-off through the use of Sustainable Urban Drainage Systems (SuDS) and shall ensure the proposed surface water network is in accordance with South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.

The provision of public open space and car parking and the visibility splay provided is fully in line with the requirements of the request for clarification of additional information by South Dublin County Council.

The proposed nursing home is considered a community asset and shall be a major planning gain for the local community.

We recommend a decision to grant permission for the development be made pursuant to the Planning and Development Act. It is considered that the proposed development fully accords with the policies and objectives of South Dublin County Council, as set out in the South Dublin County Council Development Plan and subject to conditions shall be in accordance with the proper planning and sustainable development of the area.

Yours sincerely,



Jong Kim MIPI
Director of Planning
AKM Design