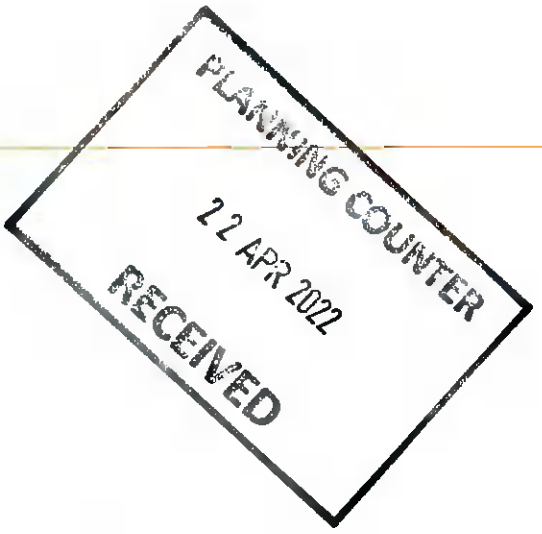
ARMSTRONG
FENTON
ASSOCIATES




22nd April 2022.

Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24.

Re:

**Proposed Residential Development at**

**at Gordon Park, Old Naas Road, Kingswood, Dublin 22**

**for Greenwalk Development Ltd.**

**ADDITIONAL INFORMATION - Ref. SD21A/0327**

---

Dear Sirs,

On behalf of our client Greenwalk Development Ltd., we wish to respond to your letter dated 2nd February 2022, requesting Additional Information (hereafter "AI") in respect of a proposed development, under planning Ref. SD21A/0327 at Gordon Park, Old Naas Road, Kingswood, Dublin 22. Our response to same is set out below.

**Item No. 1:**

*The principle of residential development at the site is not considered to be settled, having regard to the split zoning on the site, the apparent lack of local amenities in the local centre, the fact that it is not zoned 'RES-N', and the Specific Local Objective for the site. The applicant is requested to provide an audit of community infrastructure and facilities in the area as described in the objective, to demonstrate how the development would not be premature pending the adoption of a Local Area Plan, and to demonstrate how the development of the site would provide for local services as detailed in Policies UC1, UC5, R1 and R8 and of the County Development Plan.*

**Response:**

In response to Item no. 1 above, a Social Infrastructure Assessment has been prepared on behalf of the Applicant by Armstrong Fenton Associates which demonstrates the wide extent of community infrastructure and facilities within a catchment area of c. 2.5km of the application lands demonstrating that the proposed development would not be premature pending the adoption of the Local Area Plan.

Please refer to the enclosed Social Infrastructure Assessment for full details.

ARMSTRONG FENTON LTD TRADING AS ARMSTRONG FENTON ASSOCIATES
PLANNING AND DEVELOPMENT CONSULTANTS
3 THE SEAPOINT BUILDING 44-45 CLONTARF ROAD DUBLIN 3 D03 A0H3
TEL 01-4793148 REG NO 634385 VAT NO 3567821LH MANAGING DIRECTOR TRACY ARMSTRONG
WWW.ARMSTRONGFENTON.COM

**Item No. 2:**

*The proposal is located in close proximity to Casement Aerodrome. The contents of Section 11.6.6 (iii) of the County Development Plan are noted, under which development density and height can be limited, or restricted altogether. The site is under the inner approach surface of Casement Aerodrome and may be inside the 'extended public safety zone' though this is not clear. The applicant is requested to consider the same and comment in particular on how the development would comply with section 11.6.6 (iii) of the County Development Plan, in particular in relation to the headings 'Public Safety Zones' and 'Inner Approach Area'.*

**Response:**

On behalf of the Applicant, Conroy Crowe Kelly Architects have prepared the enclosed drawing numbered 2112 P 2000 titled Site Location viz. Casement Aerodrome. This drawing clearly identifies the site's location in the context of Casement Aerodrome, with the site located outside of the Inner Approach Areas to the aerodrome and not in a Pubic Safety Zone as illustrated on the accompanying map, which overlays the site's location against the Council's Land Use Zoning Map No. 8.

Please refer to the enclosed drawing numbered 2112 P 2000 titled Site Location viz. Casement Aerodrome for confirmation that the development complies with Section 11.6.6 (iii) of the CDP.

**Item No. 3:**

*The proposal would see the existing vehicular access to the site relocated to the south-west corner of the site, as an at-grade connection would be impossible to the north-west corner, where the existing vehicular access is provided. There are some notable problems with this approach: - The proposal would appear to be in breach of Policy H16 Objectives 1 and 2 of the County Development Plan, which read: Objective 1 To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009). Objective 2 To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography. - removal of mature trees at the south-west location to facilitate vehicular access; - patchy streetscape at said access owing to its proximity with adjoining sites; - It is noted that the Irish Water wayleave provides a natural location for vehicular access to the site from the north-west. Necessity to retain wayleave has provided for an unenclosed parking courtyard in the north-west corner of the site instead; - The applicant proposes to retain the stone boundary wall to the west of the site, and a number of trees on the western boundary. It is unclear if this is consistent with the proposed raising of ground level by up to 1.5m immediately inside the site at these locations; The proposed strategy is understood to be responding to the particular context and challenge of serving the proposed site. The applicant may wish to consider, alternatively, the use of a vacuum system to service the site without resorting to reprofiling.*

**Response:**

It is considered that Policy H16 Objective 2 does not apply to this site as it has neither steep nor varying topography, and we can confirm that there are no intrusive engineered solutions such as cut and filled platforms or embankments proposed as part of the proposed development / site development works.

In accordance with Objective 1, the proposal is a response to, *inter alia*, the natural contours and drainage features of the site, detailed as follows:

Topography:

The site is predominantly flat and falls gently to the north. Levels at the north-west corner are c. 92.5mOD, in the north-east corner c.93.3mOD, in the south-west corner c.93.7mOD and in the south-east corner c.94mOD.

Existing Conditions:

There is an existing 400mm diameter trunk large watermain traversing the site and the extent of wayleave associated with this watermain and the restrictions to development in proximity to this watermain have been confirmed by Irish Water. Due to the existing arrangement and extent and location of existing services on the Old Naas Road in proximity to this site, there are restrictions on where the foul sewer and surface water sewer outfalls can be located.

There is an existing 500mm Gas Transmission line in the Old Naas Road along the western boundary of the site. The applicant consulted with Gas Networks Ireland (GNI) to establish the required separation distance for any new dwellings in proximity to the gas main. GNI advised that a minimum of 7m separation distance is required from the existing gas main and any proposed new dwelling. A Ground Penetrating Radar survey was undertaken along the Old Naas Road in proximity to the site to determine the location of the gas main. Based on the findings, the proposed dwellings are set out at least 7m from the gas transmission main.

There is also an existing 600mm diameter Foul Sewer on the western side of the Old Naas Road. Site investigations, including a GPR Survey, were carried out to determine the as-built levels of the Foul Sewer. On review it was determined that a connection from the proposed development to the existing foul sewer cannot be achieved at the northwest corner of the site (the lowest part of the site), as the route to the existing public Foul Sewer is blocked by the existing 500mm diameter gas transmission line, which cannot be altered / re-routed.

Therefore, following consultation between the applicant, GNI and Irish Water, the only possible connection point for the new development to the existing foul sewer is at the southwest corner of the site. Due to the level of the existing sewer at this point, the ground levels within the north-western part of the site need to be raised to allow the site foul drainage to discharge by gravity to the existing foul sewer. Essentially, the ground levels to the northern part of the site need to be raised by circa 1-1.5m above existing ground level to achieve the required falls in the foul network to serve the proposed development. It should also be noted that the applicant submitted a pre-connection enquiry to Irish Water for the proposed development and received a Confirmation of Feasibility from Irish Water, a copy of which was included in Appendix B of the submitted Engineering Services Report by TJ O'Connor & Associates Consulting Engineers, as submitted initially with this application for permission – Ref. CDS21004323.

Surface Water:

There is an existing open watercourse to the southern half of the eastern boundary of the site. Owing to the fact that there is no existing surface water sewer on the Old Naas Road, the only available surface water outfall is this existing watercourse. In order to drain to this watercourse, the ground levels in the north of the site will need to be raised locally.

Foul Water:

As outlined above, there is an existing foul sewer on the Old Naas Road to the west. This sewer lies on the other side of a shallow, high-pressure gas trunk main. As this high-pressure gas trunk main cannot be interfered with and the Old Naas Road cannot be raised, it is only at the higher southern end of the

site where the relative depths of the pipes make it feasible to make a connection to the foul sewer. In order to drain to this sewer, the ground levels in the north of the site will need to be raised locally, as described in the initial details submitted for permission.

A pumped foul system is not an option for this small infill scheme's long-term sustainability. A gravity sewer is the standard expected by Irish Water. Notwithstanding the fact that a pumping station would adversely impact (i) achievable density with its requirement of a certain footprint, (ii) vehicular access and (iii) requires to be a large distance from any building, the lack of a public surface water sewer on the Old Naas Road means the ground levels in the north of the site would still need to be raised locally to drain surface water.

While the drainage features described above necessitate the localised raising of the ground to the north of the site (c.1-1.5m) the impact of the proposed development on the Old Naas Road has been mitigated by the revised design of the duplex block, as follows:

The duplex block now has its finished floor level reduced by 300mm and is a building in the round, with front doors on all four facades. The ground floor units have their front doors and living spaces facing the communal open space. On the west façade, the upper duplex units have a short flight of steps up to their front doors, allowing the footpath to be lowered to be mostly at grade, particularly in the vicinity of the existing stone wall and the existing trees along the road edge. The proposed revisions ensure that there is now no raising of the ground locally near the roadside trees, thus making their proposed retention feasible. The at-grade footpath allows the provision of a verge to the road, which provides an appropriate set-back for the building and an opportunity to plant new street trees to extend and enhance the tree line along the Old Naas Road into the village (see figures 3.1, 3.2 & 3.3).

*Figure 3.1: Old Naas Road elevation extract showing proposed estate fencing to replace existing modern wall from end of existing old stone wall, with existing street trees shown in brown and proposed new street trees shown in green*

While there are multiple pedestrian connections proposed, the size of this infill development is such that one vehicular connection to the Old Naas Road would suffice. While a connection at the north would be excessively ramped by necessity, the one at the south is at grade and is located just past the leafy archway provided by the trees on both sides of the road that serves as a distinctive threshold to the village of Kingswood (see figure 3.4). This is the more appropriate place for the vehicular connection and lends the scheme a sense of place, to feel part of the village.

*Figure 3.2: Extract from site section showing at-grade footpath and short flight to upper duplexes*


*Figure 3.1 Plan showing at-grade footpath west of duplex block*


*Figure 3.2: Tree canopy of Old Naas Road as threshold into Kingswood Village*

There is only one roadside tree to be removed to facilitate the proposed vehicular entrance to the site at the south-west corner with the balance to be preserved. The project arborist notes that the tree in question, a multi stemmed sycamore, already had limitations (refer to the Arborists details submitted with this application initially). In order to compensate, the proposal includes a wide inner verge next to the existing stone wall such that good-sized trees can be planted inside the site boundary to ensure the longer-term continuity of the tree-lined character. In addition, beyond the existing stone wall, a wide verge is proposed for street trees to extend and enhance the tree line.

Rather than the streetscape being patchy, we respectfully suggest that the proposal provides a continuous frontage to the Old Naas Road with a terrace of houses and a linear duplex block, with the retention of the existing low stone wall and roadside trees plus the addition of new street trees which in combination reinforce the character of the scheme and creates an appropriate street frontage.

The proposed parking court is sited appropriately to the shaded north where there are also existing windows of the neighbouring property on the boundary. This allows landscaped amenities to be concentrated in the space enclosed by the proposed dwellings.

In summary, the proposal is the result of an intensive multi-disciplined design process (i.e. architecture, engineering, landscaping and arborist) responding to all the characteristics of the site to arrive at the best optimised solution, forming a high quality scheme of appropriate density with a distinctive frontage to the Old Naas Road and providing a sense of place for the scheme to feel part of Kingswood Village.

**Item No. 4:**

*(a) The residential development is considered to be slightly low in density in comparison to County Development Plan standards and taking into account the relevant national guidance. The applicant is requested to justify the proposed density having regard to the County Development Plan and National Guidance.*

**Response:**

**(a)** The proposed development comprises 77 no. dwellings on a gross site area 2.28Ha, with the proposed development having a gross and net density of 34 units per hectare, in accordance with the guidance set out in the 2009 Sustainable Residential Development in Urban Areas Guidelines (Appendix A). There are constraints on site in terms of wayleaves and utilities that have dictated the layout of the proposed site plan, however, in accordance with the aforementioned guidelines, these areas are not discounted for the purpose of calculating the proposed density of development.

The net density of the proposed development is calculated based on the guidance provided in Appendix A – *'Measuring Residential Density'* of the *'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas'* (2009). The above guidelines state that when calculating net density the following should be excluded;

- Major and local distributor roads
- Primary schools, churches, local shopping etc.
- Significant landscape buffers
- Open spaces serving a wider area

As there are no such factors within/applicable to the proposed development, it is therefore concluded that the net and gross density of the proposed development are the same.

We note that under section 112.6 of the current Development Plan that it states: *"Applications for residential development will be assessed against the design criteria set out in Sustainable Residential Development in Urban Areas and the companion Urban Design Manual. The Urban Design Manual is primarily focused on design issues associated with housing schemes of 30-50 units per hectare, but is also relevant to schemes of a higher or lower density and mixed use development".* Also set out in the Development Plan, under section 11.3.1 (ii) *"Residential Density"* the following is stated: *"In general the number of dwellings to be provided on a site should be determined with reference to the Departmental Guidelines document Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009). As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high capacity public transport facilities. In accordance with Departmental Guidance, the residential density (net) of new development should generally be greater than 35 dwellings per hectare, save in exceptional circumstances. Local Area Plans, SDZ Planning Schemes and Framework Plans will set out density bands in growth areas".*

Notwithstanding the above quoted text from the relevant Plan, i.e. the South Dublin County Development Plan, we note that in April 2021, the Department of Housing, Local Government and Heritage (DoHLGH) issued Circular Letter NRUP 02/2021 in relation to residential densities, which essentially outlined *"that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village".* Both we and the aforementioned circular acknowledge that *"Section 5.11 of the Sustainable Residential Development Guidelines states that for Outer Suburban/'Greenfield' sites within cities and larger towns, the density of development should be in the general range of 35-50 dwellings per hectare".* It should also be noted that Section 5.11 of the

guidance also states that development at net densities of less than 30 dwellings per hectare is generally discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares, and to which the current proposal complies.

Based upon the guidance set out in Circular Letter NRUP 02/2021, we note that the DoHLGH stated that *"it is necessary for An Bord Pleanála and Planning Authorities to exercise discretion in the application and assessment of residential density at the periphery of large towns"* and that *"the full range of outer suburban density, from a baseline figure of 30 dwellings per hectare (net) may be considered"*. Taking all of the foregoing into account, the proposed development provides for a net and gross density of 34 units per hectare which is put forward as complying with the aforementioned Guidelines in that the development is being delivered at a greater density of 30 units per hectare but also that the proposed development complies with recent guidance issued by DoHLGH whereby density ranges of 30-50 units per hectare can be applied and therefore considered appropriate.

Notwithstanding the above, if the proposed area of public open space being provided as part of the application site i.e. 0.258Ha is discounted from the gross site area i.e. 2.28Ha, it leaves a net developable area of 2.02Ha, which produces a resultant net density of 38 units per hectare. It is therefore respectfully put forward that given the locational context of the application site and the existing character of the environs that the proposed density is in accordance with current guidance regarding same.

*(b) Pedestrian Connections*

*(i) The pedestrian connections to the south should be agreed with the adjoining management company and provided as part of the development – in particular, the south-east connection as proposed does not match the existing boundary gate connecting the development to the south with the rugby pitches. These spaces should link up and if possible the adjoining public open spaces should form a single larger space. The applicant should progress this issue and provide a response via additional information. Note: It is noted that the development to the south is due to be taken in charge as per the details of that permission, but that open spaces will remain in the charge of an Owner's Management Company.*

**Response:**

**(b) (i)** At the existing south-east boundary gate, there is a 1.6m difference in ground level between the application site and the adjoining Silken Park development, the application site being the lower (see figure 4.1 below).

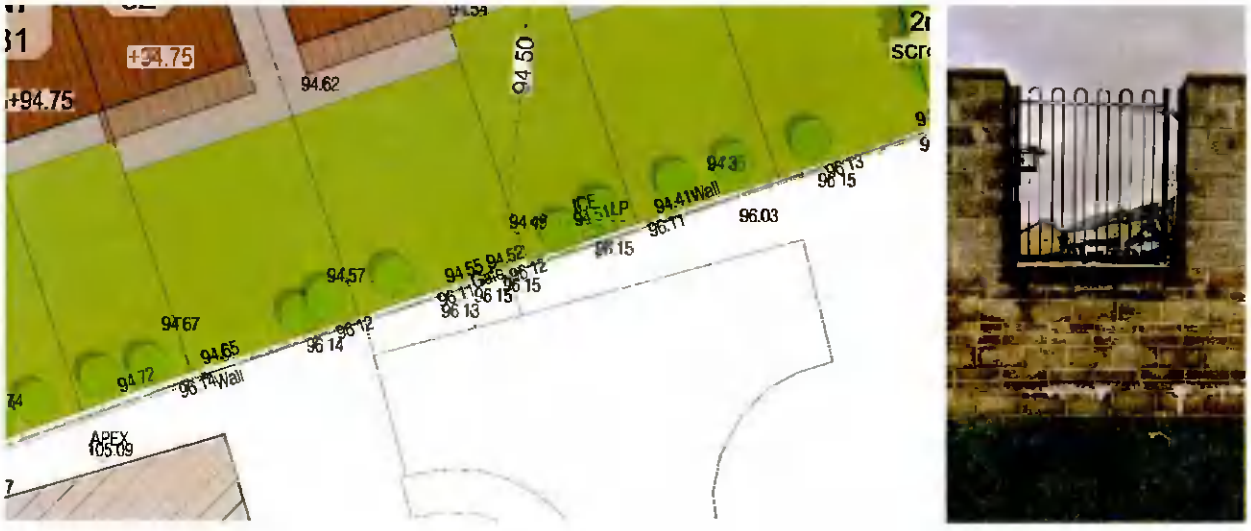



*Figure 4.1: Existing boundary gate at south-east of site – surveyed levels and photograph*

As can be seen, the existing gate opens onto the road hammerhead of Silken Park and not ono the open space to its east. As recommended, the proposed development provides for the facilitation of connections into the adjoining development via the linking up of the open spaces and for this reason it is proposed that a path within the proposed open space gently rises to connect directly with the Silken Park open space, subject to the agreement of the neighbouring Management Company (see figures 4.2 and 4.3 below).


*Figure 4.3: Extract from application site layout plan, south-east corner*


*Figure 4.4: Extract from application Contiguous Elevations; House E2X overlooking open space path*

The Applicant has exchanged communication with the Owner's Management Company that demonstrates the pedestrian connection points as illustrated on the enclosed Proposed Site Layout Plan. The Owner's Management Company have responded to confirm the Directors are reviewing the pedestrian connection points and will request the opinion of the members at the next general meeting. It is hopeful that an agreement can be reached to deliver the connectivity, however, the proposed development certainly facilitates the opportunity for same.

*(b) Pedestrian Connections*

*(ii) The proposed pedestrian connection to the south-west would be accessible via a parking court off the main street. It is considered that the street layout here could be considerably improved with the reorganisation of the adjoining block, through the provision of dormer bungalows with direct frontage onto the connection and siding onto the southern boundary. and wrap-around corner units, to provide continuous residential frontage onto the pedestrian route, ensure a street-like layout, and guarantee passive surveillance. The applicant should consider revising the layout at this location.*

**Response:**

**(b) (ii)** Passive supervision of this pedestrian route is important. The design has been revised to push house no. 25 back 1.8m to further overlook the route. The four houses of this court are all wide-fronted houses in the vein of dormer bungalows, having both the living room and the kitchen/dining room flanking the front door. Both housetype E2 and E3 at the terrace ends are corner turning triple-aspect houses, with their living rooms looking out to both street sides. Figure 4.4 highlights in red the extent of public room windows and front doors directly overlooking this court, while figures 4.5 and 4.6 give an impression of the proposed house no. 24 as seen from the adjoining development, the gate into which could be opened should consent arise in the future. As a result, this area is very well passively supervised and is a street that has residential frontage that can also be connected to the adjoining development when the consent for same arises.


*Figure 4.4: South-west corner highlighting in red front doors and windows overlooking*

*Figure 4.5: South-west gate viewed from Silken Park*

*Figure 4.6: Proposed development (unit 24) as viewed from Silken Park*

*(c) Northern Street and Duplex Layout. The communal amenity space for the proposed duplex block is adequately sized but inappropriately placed, presenting a long hedgerow boundary to a residential street. Similarly, the parking court to the north of the duplex block seems to be a left-over space which could be improved. The arrangement of the duplex block, communal amenity space, and parking court, should be reappraised and revised in order that the communal space can be enclosed without presenting a defensive boundary to the local street. The applicant is requested to provide on-street parking and a stronger building frontage.*

**Response:**

**(c)** The proposed duplex block has been revised in light of the comments received. Its finished floor level has been reduced by 300mm and it is now a building in the round, with front doors on all four facades. The ground floor units now have their front doors and living spaces facing the communal open space. On the west facade the upper duplex units now have a short flight of steps up to their front doors, allowing the footpath to be lowered to be mostly at grade, particularly in the vicinity of the existing stone wall and the existing trees along the road edge. This lowering of the footpath also affords a better degree of privacy to the bedroom of the lower unit on the west façade. Living spaces of the upper units face both west onto this path and east onto the communal open space (see figure 4.7).


*Figure 4.7: Communal open space section with duplex block in elevation*

This communal open space is not intended to present a high defensive barrier to the street. Rather, low planting will be employed of a size/type that will ensure safety, allowing the space to feel part of the larger space, enclosed by the buildings, along with the specimen tree on the landscaped 'teardrop' nearby. We respectfully suggest that it is more appropriate to concentrate the landscaped amenities in the space enclosed by the proposed dwellings and keep the necessary car spaces in the more shaded north where there are also existing windows of the neighbouring property on the boundary. Therefore, the view from the dwellings will be predominantly planting rather than predominantly cars (see figure 4.8).


*Figure 4.8: Extract from site layout showing communal open space*

**Item No. 5:**

*The impact of the proposed development on the existing trees contained within the development site is not acceptable to the SDCC Public Realm Section, and would contravene policy G2 Objective 9, G4 Objective 5, G2 Objective 13, G6 Objective 1, HCL15 Objective 3 and other GI policies and objectives in the County Development Plan. The current proposal would have a negative impact on existing trees within the development site area. The proposed development will require the removal of 38 no. trees and a large section of existing hedgerow. The applicant should provide a response which should include a revised layout to significantly reduce the impact of the proposed development on the existing mature trees, in particular addressing:*

*(a) those trees located along the western boundary which are proposed to be removed.*

*(b) The proposal provides for the removal of a number of mature trees and boundary hedgerows, particularly to the south-west of the site, which would erode the existing sense of privacy for adjoining residents. To facilitate a proposed row of houses to the south-west (units 16 to 23), it is proposed that a row of trees and hedgerow would need to be removed. These could be better retained in, for instance, communal our public amenity space. In combination with the general concern for loss of trees arising from the development, the applicant is requested to address potential alternatives at this location which would allow for the retention of these trees.*

**Response:**

On behalf of the Applicant, the project landscape architects Cunnane Stratton Reynolds have prepared a response to Item No. 5. It should also be noted that they have liaised with SDCC Parks Department prior to submitting this formal AI response and agreed in principle, the details put forward for permission. For clarity, please note the following:

**(i)** The only native hedgerow on the site is located along the eastern boundary where its stretches for approximately ¾ of this boundary. It is proposed to retain all of this boundary, most of which will abut a proposed open space which will create no conflicts. A small stretch is maintained very close to the side garden boundaries of two of the proposed houses. This will require special construction techniques for the boundary to avoid strip foundations and severe cutting back of the hedgerow to allow access and construction locally, however, it is intended to allow the hedgerow regrow to maintain this feature and ecological connectivity.


*Figure 5.1: Rotated extract from Dwg 21578-2-101 Landscape Masterplan showing Eastern boundary and retained hedgerow*

**(ii)** The AI refers to the removal of a hedgerow / row of trees to the southwest boundary to facilitate a row of houses. The submitted Arborist's Report describes these as an Overgrown and Unmanaged Leyland Cypress hedge with a small number of Sycamore trees amongst them (refer to the Arborists details submitted with this application initially). As can be seen in Figure 5.2 below, these are of poor quality and the dense Leyland conifers are of no visual, amenity or ecological value. These will be removed to facilitate the new housing backing on to existing housing in accordance with best practice and secure design principles.

*Figure 5.2: Existing Leyland cypress*

**(iii)** A small group of mature trees are found along the site boundary with the Old Naas Road to the west. These are growing in the public verge to the side of the road rather than within the site. The Arborists report recommends that these trees be removed as they are in poor condition, however, they provide an attractive feature approaching Kingswood generally and to the site frontage in particular, creating a *"village"* character. A small cluster of trees will be removed to facilitate site access, however, the remainder will be retained and the works have been designed and further revised to minimise impacts on their health.

Please see refer to drawing no. 21578-2-101 titled Landscape Masterplan and the enclosed Arborists report and impact statement for full details.

**Item No. 6:**

*The applicant is requested to provide the following additional information as required by the SDCC Public Realm Department:*

*(a) Landscape Plan*

*(i) The applicant is requested to submit a plan which clearly delineating communal and private spaces should be provided, as well as a detailed breakdown of the total area of same. Consideration of how the design of the landscape and provision of furniture/equipment will facilitate use of these spaces for both adults and children is also required.*

*(ii) The applicant is requested to submit level details for the open space, this shall include cross section drawings where applicable. If retaining walls are required, they shall be located outside the open space.*

*(iii) Details of tree planting pits to include SUDs measures in urban tree pits*

*(iv) Detailed planting plan.*

*(b) 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.*

*(c) Children's Play Additional play provision shall be provided for within the proposed development. An emphasis shall be on active, accessible play throughout the development. The applicant is requested to provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant shall consider the provision of additional universally accessible equipment within the play proposals for the 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 shall be of predominantly natural materials with unstructured play included in the proposed design. The applicant shall consider the use of engineered woodchip as playground surfacing material. The applicant shall provide further details in this regard.*

**Response:**

It should eb noted that prior to submitting this formal AI response, on behalf of the Applicant, the project landscape architects Cunnane Stratton Reynolds engaged in a review with Laurence Colleran of SDCC Parks Department of the information initially submitted addressing the above points, the incorporation of changes in relation to tree sizes as requested, and changes required as a result of other variations to the scheme. It is based upon the outcome of these discussions, that the submitted details are put forward for permission, as agreed in principle with SDCC Parks Department. The revised, submitted plans also include additional trees in the public realm – in a number of build-outs within the streetscape - and the retention of several street trees and associated green spaces, originally within the private curtilage of the houses, as areas to be managed centrally by the project's management company rather than allocated to private residences/residents. These areas will be railed off to ensure the legibility of this distinction and the long-term sustainability of the new street trees to maturity. The proposed tree pits and bioretention area will incorporate SuDs functions to generate additional surface water storage on the site.

The introduction of the tree pits, bioretention area, and filter strips coupled with the previously proposed SuDS features such as permeable paved driveways and infiltration trenches have generated sufficient additional surface water storage on the site to allow the footprint of the sub-surface attenuation tanks in the public open space to be reduced by circa 20%. Refer to the Engineers Surface Water/SuDS Management Plan and surface water drawings that accompanies this submission for further details on the proposed SuDS features.

Details of the proposed children's play area are set out in the enclosed Landscape Design Statement and drawing numbered 21578-2-102 titled Play Area Details prepared by Cunnane Stratton Reynolds for full details.

These proposals can be seen in more detail on Drawing Nos. 21578-2-101 Landscape Masterplan Rev F; 21578-2-105 Tree Taken in Charge and SUDs Tree Pit; 1578-2-701 Detail of Communal Tree Garden and the Landscape Design Statement Rev C April 2022 and in the Engineers SUDs and Surface Water Drainage proposals.

**Item No. 7:**

*The SDCC Public Realm Department has noted a number of concerns relating to the related issues of water attenuation, SUDs, and public open space. The applicant is requested to provide additional information to address the following points:*

*(a) 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 theses 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 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 to be provided by the applicant. Further consideration of the breakdown in provision of open space and the location and size of attenuation tanks needs to be carried out. Response should include revised layout and drawings.*

*(b) The applicant is requested to submit revised plans 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*

*(iii) Green infrastructure proposals that will mitigate and compensate for the impact of the proposed development on the existing boundary trees. 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. Response should include revised layout and drawings.*

*(c) 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 should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits. In addition, the applicant is requested to provide the following:*

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

*(ii) Street Trees should be planted in public open space with suitable tree pits that incorporates SuDS features*

*(iii) 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)** In response to the requested information listed, TJ O'Connor & Associates Consulting Engineers have prepared the enclosed Surface Water Management Plan and associated Surface Water Layout Plans which details the revised proposals with regard to the proposed location of the attenuation tanks within the open space areas to be provided by the applicant.

Please refer to the same for full details.

**(b) (i)** Please refer to the enclosed Landscape Design Statement, Landscape Masterplan and Boundaries Treatment drawings for the proposed amendments to the existing green infrastructure especially the mature boundary trees within the proposed development site.

In addition, and as outlined above, the only native hedgerow on the site is located along the eastern boundary where its stretches for approximately ¾ of this boundary. It is proposed to retain all of the boundary most of which will abut a proposed open space which will create no conflicts. A small stretch is maintained very close to the side garden boundaries of two new houses., which will require special construction techniques for the boundary to avoid strip foundations and severe cutting back of the hedgerow to allow access and construction locally, however it is intended to allow the hedgerow regrow to maintain this feature and ecological connectivity. Along the south-west boundary there are overgrown and unmanaged Leyland Cypress hedge with a small number of Sycamore trees amongst them, which have been confirmed by the project Arborist to be of poor quality and the dense Leyland conifers of no visual, amenity or ecological value. These will be removed to facilitate the new housing backing on to existing housing. Only one tree is proposed to be removed to facilitate the proposed vehicular access into the development with the existing trees along the Old Naas Road being retained and supplanted by new proposed tree planting.

**(ii)** The introduction of the tree pits, bioretention area, and filter strips coupled with the previously proposed SuDS features such as permeable paved driveways and infiltration trenches have generated sufficient additional surface water storage on the site to allow the footprint of the sub-surface attenuation tanks in the public open space to be reduced by circa 20% demonstrating how natural SuDS features are incorporated into the design of the proposed development

**(iii)** Green infrastructure proposals that will mitigate and compensate for the impact of the proposed development on the existing boundary trees have been incorporated in the enclosed landscaping details prepared by Cunnane Stratton Reynolds. The landscaping pack includes 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 biodiversity.

Please refer to the full suite of drawings and Landscape Design Statement for clarity and confirmation of proposed details.

**(c)** In response to the requested information listed, TJ O'Connor & Associates Consulting Engineers have prepared the enclosed Surface Water Management Plan. Please refer to same for details.

(i) Detailed drawings prepared by TJ O'Connor & Associates Consulting Engineers are enclosed which demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development - please refer to the following submitted drawings for details on same:

- Proposed Permeable and Impermeable Sub Catchment Areas, drawing numbered 21003-TJOC-ZZ-

ZZ-DR-C-0067
- Overview of Proposed SUDS Features, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0080
- SUDS Features Cross Sections and Details, Sheet 1, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0081
- SUDS Features Cross Sections and Details, Sheet 2, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0082

(ii) Detailed drawings prepared by Cunnane Stratton Reynolds are enclosed which demonstrate how the development includes tree pits which incorporate SUDS features which 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.

Please refer to the following drawings for details on the same:

- Proposed Permeable and Impermeable Sub Catchment Areas, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0067
- Overview of Proposed SUDS Features, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0080
- SUDS Features Cross Sections and Details, Sheet 1, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0081
- SUDS Features Cross Sections and Details, Sheet 2, drawing numbered 21003-TJOC-ZZ-ZZ-DR-C-0082

(iii) Detailed drawings prepared by Cunnane Stratton Reynolds are enclosed which demonstrate how street trees should be planted in public open space with suitable tree pits that incorporates SuDS features – i.e. drawing numbered 21578-2-701 titled Detail Communal Tree Garden and SUDS Tree Pit.

**Item No. 8:**

*(a) Based on limited information provided the surface water attenuation of 984m3 is undersized by approximately 10%. The applicant is requested to submit a report showing revised details of different surface types such as buildings, permeable paving, green areas and their respective run off coefficients.*

*(b) The applicant is requested to submit a revised drawing showing the proposed surface water attenuation. Any additional attenuation required should be provided by means of SuDS (Sustainable Drainage). Examples of SuDS include, green roofs, permeable paving. filter drains, swales, green area detention basins, tree pits and other such SuDS.*

*(c) The applicant is requested to clarify and illustrate on a drawing if a petrol interceptor is proposed prior to entry of surface water to arched type proposed attenuation systems. A suitable sized petrol/oil interceptor should be proposed.*

*(d) Water Services of SDCC estimate that surface water discharge should be limited to 5.1 litres/ second and not 6.5 litres/second as proposed on drawing number 21003-TJOC-ZZ-DR-C-0065. The applicant is requested to submit a report and drawing to explain this difference and adjust where necessary.*

**Response:**

**(a)** On behalf of the Applicant, TJ O'Connor & Associates Consulting Engineers have prepared a detailed response to AI request numbered 8 (a), see below. We request that SDCC refer to their drawing no. 21003-TJOC-ZZ-ZZ-DR-C-0067 which accompanies this submission. The drawing includes a full breakdown of the surface types on the site. We also refer to Table 1 below which shows the respective run-off rate for all surface types. We note that these run-off rates are based on the Rational Method design

for surface water networks. As set out in the Engineering Report that accompanied the planning application, the surface water design for this site was carried out using Microdrainage software which is based on the Modified Rational Method. When using the modified rational method of design, it is recommended to apply a run-off factor of 100% to all impermeable areas and a run-off factor of 0% to all permeable areas (such as private open spaces and public open spaces).

The modified rational calculation method contains volumetric and routing factors which modifies the contributing areas applied to impermeable areas to take account of the surface water run-off from permeable areas. For comparison purposes, we include Table 2 below which shows the run-off factors applied for the Modified Rational Method. The equivalent contribution area for each method is exactly the same i.e. 1.29Ha.

| Equivalent Impermeable Area Based on Rational Method | | | |
|---|---|---|---|
| Surface Type | Area (Ha) | Run-Off Coefficient (%) | Equiv. Imp. Area (Ha) |
| Roads | 0.2834 | 95% | 0.27 |
| Footpath | 0.1137 | 80% | 0.09 |
| On Curtilage Parking (Permeable Paving) | 0.2707 | 60% | 0.16 |
| Roof Areas | 0.6268 | 95% | 0.60 |
| Private Open space | 0.422 | 20% | 0.08 |
| Public Open Space | 0.4885 | 15% | 0.07 |
| Footpaths Draining onto Public Open Space | 0.0769 | 15% | 0.01 |
| Total Site Area | 2.282 | Total Equivalent Impermeable Area (Ha) | 1.29 |

*Table 1 – Surface Types and Run-Off Coefficients based on Rational Method of Surface Water Design*

| Equivalent Impermeable Area Based on Modified Rational Method (Used in Microdrainage Software Design) | | | |
|---|---|---|---|
| Surface Type | Area (Ha) | Run-Off Coefficient (%) | Equiv. Imp. Area (Ha) |
| Roads | 0.2834 | 100% | 0.28 |
| Footpath | 0.1137 | 100% | 0.11 |
| On Curtilage Parking (Permeable Paving) | 0.2707 | 100% | 0.27 |
| Roof Areas | 0.6268 | 100% | 0.63 |
| Private Open space | 0.422 | 0% | 0.00 |
| Public Open Space | 0.4885 | 0% | 0.00 |
| Footpaths Draining onto Public Open Space | 0.0769 | 0% | 0.00 |
| Total Site Area | 2.282 | Total Equivalent Impermeable Area (Ha) | 1.29 |

*Table 2 – Surface Types and Run-Off Coefficients based on the Modified Rational Method of Surface Water Design*

With reference to the surface water attenuation volume of 984m³, this figure does not include the surface water storage that is generated in the subbase of the permeable paved driveways of the houses or the permeable paved car park for the Duplex Units during peak storm events. The driveways for the houses and the car park for the duplex units are provided with permeable paving which contains a subbase build-up of 350mm of clean crushed permeable stone to EN 13242.

A detail of the permeable paved build-up was shown on Drg. No. 21003-TJOC-ZZ-ZZ-DR-C-0075 which accompanied the initial planning application details. A copy of the detail is provided in Figure 1 over for reference also. The permeable stone subbase has a voids ratio of circa 30-40% which provides surface

water storage during peak storm events. The depth of subbase is generally determined based on the load applied to the surface of paving (i.e. vehicle loading) and the subsoil strength. In this instance, the depth of subbase has been determined to be 350mm.

The proposed permeable paving to the driveways and car park areas and their associated subbase storage were included in the Microdrainage Surface Water design/calculations that accompanied the original planning application. The depth of water stored in the subbase of each driveway/car park during the 1% AEP surface water storm event varies across the site, as the shape and size of each driveway varies across the site. However, on review of the surface water calculations submitted with the initial application details, the average depth of water levels in the subbases of driveways/car park is approximately 145mm in the peak 1% AEP storm event. This equates to 41.4% of the storage volume available in the driveway and excludes any water that infiltrates into the ground below the driveways/car parks. Based on the above, Table 3 below sets out the overall surface water storage/attenuation provided across the site in the original application. The total figure of 1,102m$^3$ is greater than 984m$^3$ + 10% (1,085m$^3$).

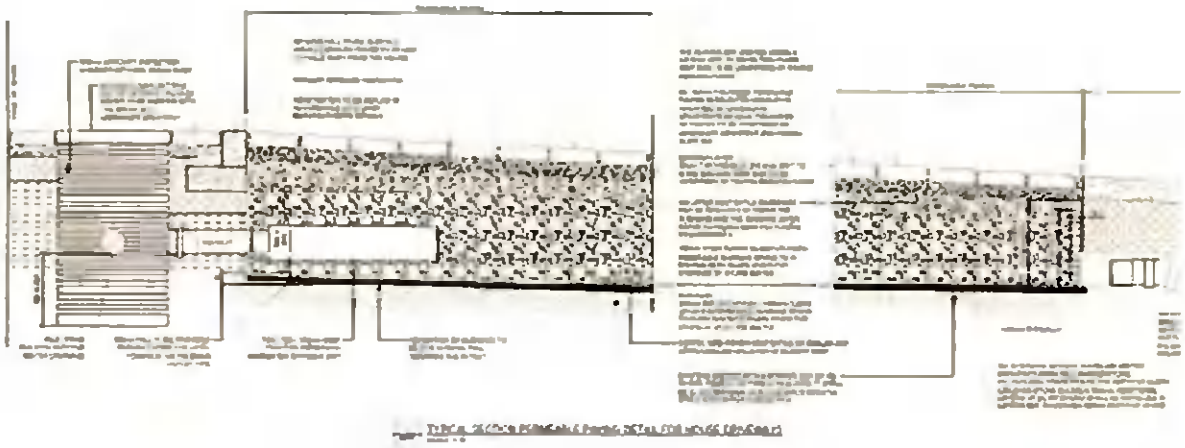


*Figure 1 – Detail of Permeable Paved Car Park/Driveway*

| Surface Water Storage/Attenuation in Original Application | | |
|---|---|---|
| Feature | Volume (M3) | Comments |
| Stormtech Attenuation MC3500 | 757 | Located at east of site |
| Stormtech Attenuation SC740 | 136 | Located at northwest of site |
| Piped Network and Manholes | 84 | |
| Bioretention Swale | 7 | Located at southwest of site |
| Subbase Storage in Permeable Paved Driveways and Car Park | 118 | Calculated based on 2707m2 of permeable paving across the site, average depth of water in subbase of 145mm and 30% Voids Ratio (2707m2 x 0.145m x 30% = 118 m3 |
| Total Volume | 1102 | M3 |

*Table 3 – Summary of Surface Water Storage/Attenuation Volumes in Original Application*

(b) On behalf of the Applicant, TJ O'Connor & Associates Consulting Engineers have prepared a detailed response to AI request numbered 8(b), see below.

Following consultation between the applicant and SDCC's Parks/Public Realm Department, it is proposed to reduce of the below ground surface water attenuation tank in the main open space area and to introduce additional SuDS and Surface Water storage features to the overall site plan including Tree Pits, Bio-retention Area and Filter Strips. These additional features will complement the SuDS features which were previously designed and detailed for the scheme, including Infiltration Trenches and the Permeable Paved driveways/car park areas.

In summary, the surface water run-off from the front roofs of houses will be filtered and stored in permeable paved driveways. The surface water run-off from the rear roofs of houses and any hard standing areas to the rear of houses will be directed to infiltration trenches in the rear gardens of the houses. The surface water in the infiltration trenches and permeable paved subbase will infiltrate into the ground where possible, otherwise it will discharge into the site surface water network via perforated outlet pipes within the SuDS feature.

For the site roads and footpaths, surface water run-off will be collected in road gullies or diverted to dropped kerbs and subsequently discharged into a number of SuDS features such as tree pits, bioretention areas and filter strips. The SuDS features will be provided with subsurface storage media with a minimum voids ratio of 30% to generate surface water storage within the SuDS feature.

The additional SuDS features have been incorporated into the Surface Water design and the revised Surface Water drawings and calculations are included in this Additional Information submission. The revised surface water storage volumes are summarised in Table 4 below. The revised surface water calculations are included in the Surface Water Management Plan that accompanies this Additional Information Response appended to demonstrate that there is no flooding in the surface water system for storm events up to and including the 1% AEP peak storm event.

| Revised Surface Water Storage/Attenuation Volumes | | |
|---|---|---|
| Feature | Volume (M3) | Comments |
| Stormtech Attenuation MC3500 | 577 | Located at east of site |
| Stormtech Attenuation SC 740 | 136 | Located at northwest of site |
| Piped Network and Manholes | 96 | |
| Tree Pits | 18 | Calculated based on 66.7m3 of sub-surface storage medium with a minimum voids ratio of 30%. Volume excludes water that may infiltrate to ground if infiltration is available or water that is lost due to evapotranspiration |
| Filter Strips and Infiltration Trenches | 62.7 | Calculated based on 459 linear metres of Filter Strips and Infiltration Trenches. Volume excludes water that may infiltrate to ground if infiltration is available |
| Bioretention Area | 11.8 | Calculated based on 37m2 of Bioretention area |
| Subbase Storage in Permeable Paved Driveways and Car Park | 211 | Calculated based on 2707m2 of permeable paving across the site, average depth of water in subbase of 272mm and 30% Voids Ratio (2707m2 x 0.260m x 30% = 211 m3 |
| Total Volume | 1112.5 | M3 |

*Table 4 – Summary of Revised Surface Water Storage/Attenuation Volumes*

**(c)** On behalf of the Applicant, TJ O'Connor & Associates Consulting Engineers have prepared a detailed response to AI request numbered 8 (c), see below.

A petrol/oil interceptor was shown on Drg 21003-TJOC-ZZ-ZZ-DR-C-0065 which was included in the original planning submission. This drawing has been updated as set out above and the revised drawing is included in the response to the Additional Information request. An extract from the drawing is enclosed below for reference also. A Klargestor NSBE025 Petrol/Oil interceptor is proposed to be installed at the upstream end of the arched type attenuation system. The interceptor has been sized based on the contributing surface area of the site and the flow rate in the surface water system.

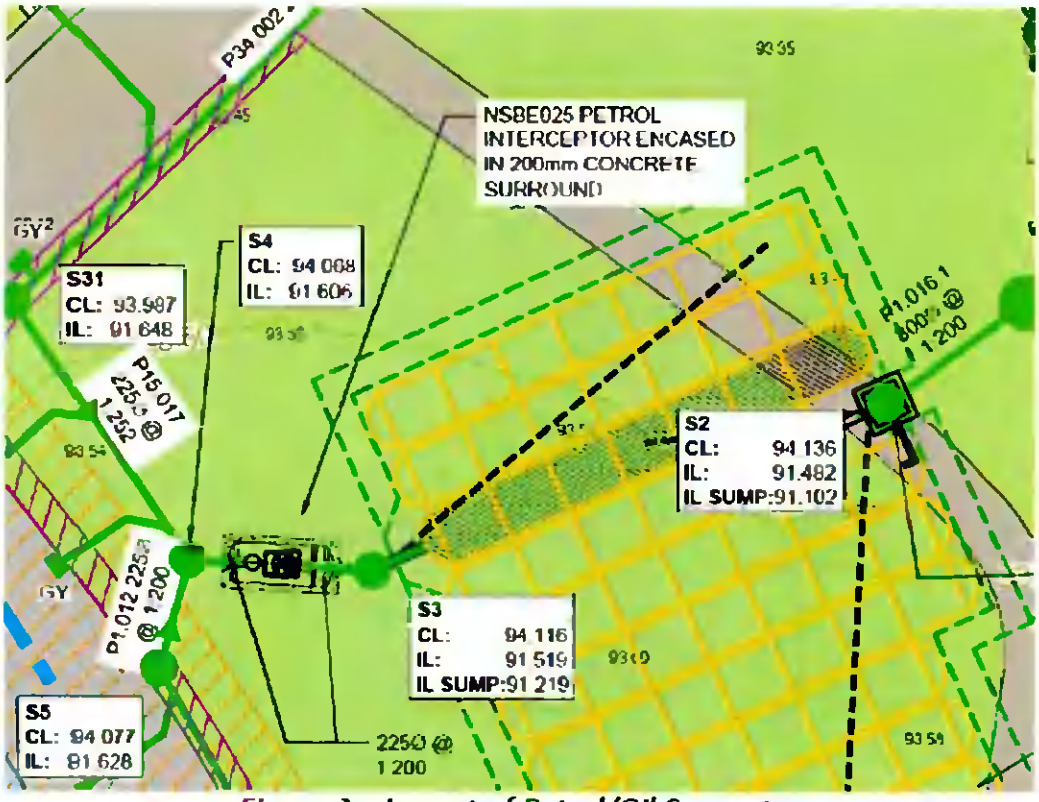



*Figure 2 – Layout of Petrol/Oil Separator*

**(d)** On behalf of the Applicant, TJ O'Connor & Associates Consulting Engineers have prepared a detailed response to AI request numbered 8 (d), see below.

A flow control device with a surface water discharge rate of 5.4 l/sec was shown on Drg 21003-TJOCZZ-ZZ-DR-C-0065 which was included in the original planning submission. A second flow control device was also indicated on this drawing. The purpose of the second flow control device was to hold back and control surface water flow in the surface water network within the site. The limit set for the second flow control device is 6.5l/sec. However, there is only one surface water discharge point from the site and the flow control device at this point is set at 5.4l/sec.

The discharge rate of 5.4l/sec was determined using the HR Wallingford Greenfield run-off rate calculator. This calculation was included in the Engineering services report in the original planning submission and is appended to this letter also. The site parameters used to determine the greenfield run-off rate are set out overleaf.

- Site area of 2.282 hectares,
- Soil type 2,
- SAAR of 873mm.

We refer to the extract below which shows the location of the flow control device that limits the surface water discharge from the site to 5.4l/sec.

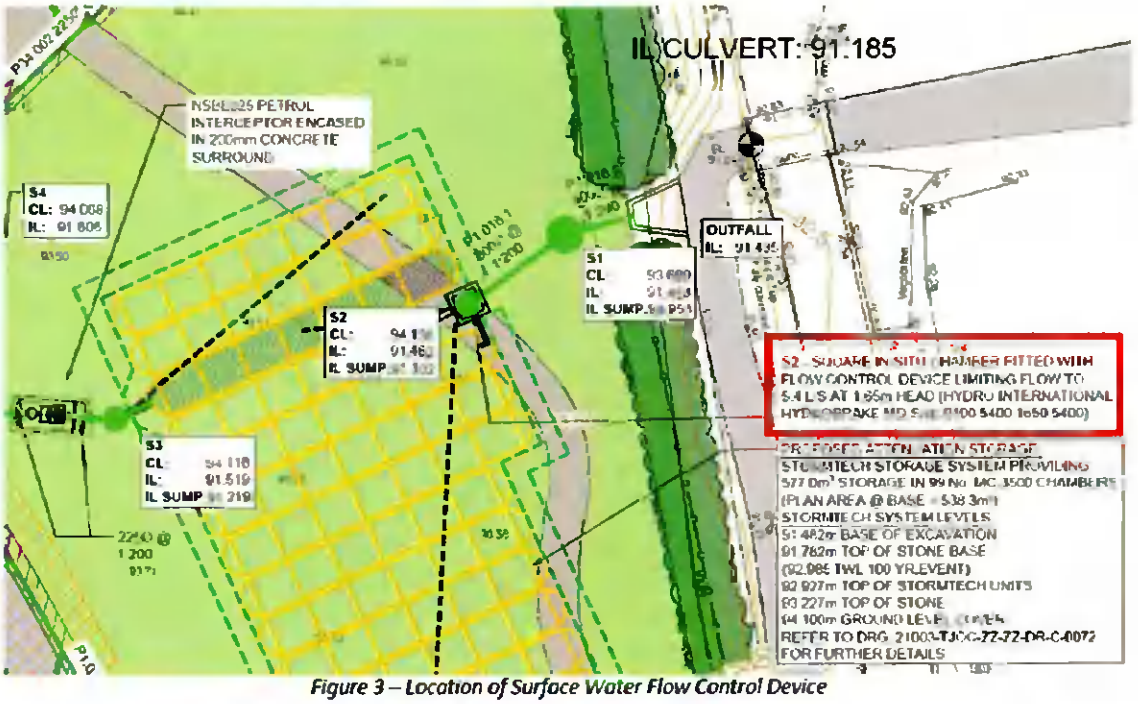



*Figure 3 – Location of Surface Water Flow Control Device*

**Item No. 9:**

*The applicant is requested to:*

*(a) provide a Stage 1 & 2 Road Safety Audit of the completed design.*

*(b) revise the cycle parking provision to match those standards found in the 2020 Apartment guidelines. and to provide cycle parking around the public open space.*

*(c) consider improvements to the adjoining section of the Old Naas Road for the purposes of improving pedestrian and cycle access to infrastructure in the local centre.*

**Response:**

**(a)** A Road Safety Audit has been carried out by Bruton Consulting Engineers and is submitted as part of this AI response – please refer to same. All recommendations outlined in the RSA have been accepted and included in the revised layout.

**(b)** The 2020 Apartment Guidelines require 1 no. resident bicycle space per bedroom and 1 no. visitor space per 2 no. dwellings, which for the proposed development requires 28 no. resident spaces and 7 no. visitor spaces – as per the following table:

| | No. of units | No. of bedrooms |
|---|---|---|
| 1-bed unit | 7 | 7 |
| 3-bed unit | 7 | 21 |
| | Total | 28 |

29 no. resident bicycle spaces are proposed to be provided. The proposed duplex building contains 9 no. bicycle spaces, 1 each for 6 of the ground floor apartments (under cover in their terraces) and 3 in a ground floor store for the upper unit above. The remaining 20 no. bicycle spaces are accommodated in a purpose-built bike shed in the communal area. Please refer to the enclosed ground floor plan of the duplex block (further information drawing no. 2112-P-DP-100-RevA) and the external bicycle store

drawing which formed part of the original application (application drawing on. 2112 P 210).

8 no. visitor bicycle spaces are proposed near the communal open space and a further 8 no. visitor bicycle spaces are proposed in the public open space as suggested, near the playground. These will be in the form of Sheffield stands. Please refer to the Site Layout Plan (drawing no. 2112 P 1001 Rev A).

**(c)** As recommended in the submitted Road Safety Audit, additional crossing points have been provided along the boundary of the proposed development. This will allow pedestrians traveling north or south along the Old Naas Road to do so using a footpath.

In addition to this, a footpath will be provided along the entire boundary of the development. This will allow South Dublin County Council to link lands to the north and south of the development at a future stage along the eastern edge of Old Naas Road. This matter has been discussed with SDCC Roads Department prior to the submission of this AI response.

Please refer to the enclosed Pinnacle Engineering Drawing No. 210514-PIN-XX-DR-D-0030-S1-P01 which shows the permeability links to/from the development and towards Kingswood Village/lands to the north of the development.

**Item No. 10:**

*The applicant has provided a letter from a childcare business in Citywest supporting the non-provision of childcare facilities on the site owing to the potential to undermine the viability of the existing facility. It is considered that a potential childcare facility would usually be expected in a large development and more details should be submitted regarding the capacity and no. of enrolments at the existing facility.*

**Response:**

The current application does not propose the development of a childcare facility as it was considered that the current proposal does not require same. The proposed development consists of 77 no. dwellings, with the 2001 Childcare Facilities Guidelines requiring 20 no. childcare places for every 75 no. dwellings. However, if one discounts the 7 no. 1 bedroom units proposed, which would not reasonably be expected to have childcare needs, that would result in 70 no. dwellings requiring childcare services, which negates the need for the proposed development to have its own childcare facility, in accordance with the 2001 Guidelines.

We are aware of a number of permitted / existing childcare facilities in the environs that we consider to be sufficient to cater for the childcare needs of the proposed development. In addition, as part of the Social Infrastructure Assessment which accompanies this Additional Information response, a study of the existing childcare provision is set out in Section 4.2 of said assessment. The assessment concludes that there are existing vacancies in existing childcare facilities to cater for the likely demand created by the proposed development.

Furthermore, we submit an updated latter for a nearby childcare facility, Links Childcare, which confirms that they currently have capacity in their facility, i.e. 15 no. childcare spaces which could reasonably be considered to serve the childcare needs of the proposed development.

Taking all of the foregoing into consideration, it is put forward that the level of existing and permitted childcare facilities in the area is sufficient to cater for the childcare needs that may arise from the proposed development.

**Conclusion:**

We consider that all the items that required Additional Information have been fully addressed. The submitted details clearly demonstrate that there are significant infrastructural constraints both within and abutting the site that cannot be altered and are outside of the control of the applicant. That, coupled, with the ground levels on site, preclude the applicant from utilising the existing vehicular entrance at the north-west corner of the site, thus leaving only one option to access the site, i.e., as proposed at the south-west corner of the site. However, in facilitating same, only one tree is proposed to be removed. The existing planting along the Old Naas Road will be retained and supplemented by new planting. The proposed duplex building has been revised to ensure that there are no major intrusive / extractive works required to accommodate same, whilst also presenting an appropriate urban street frontage, which along with the proposed boundary treatment, ensures a suitable design that is in keeping with the character of the area.

The proposed development has been assessed in terms of impacts on social infrastructure with the submitted assessment demonstrating there are ample services in the locality to cater for the needs of the proposed development. The proposed density of 34 units per hectare has been calculated in accordance with national planning guidance and accords with current guidance on same. The proposed development retains considerable existing vegetation and proposes to supplement same by new planting. Planting to be removed has been confirmed by the project arborist to be of poor quality, and as discussed with the Parks Department prior to submitting this AI response.

All public realm spaces are adequately overlooked providing passive supervision, whilst the layout of housing provides good compact form. Connectivity to adjoining lands to the south is facilitated by the layout, with the applicant having engaged with the adjoining management company to provide same and a response is awaited, however, the applicant has facilitated the connectivity insofar as they have the power/control to do so.

The aim of this application for permission is to build high quality homes that have access to local services and high quality open spaces. Taking all of the details set out in this AI response into consideration, we request that the permission being sought is granted as it accords with the proper planning and sustainable development of the area.

We are satisfied that the development is acceptable in terms of use, residential density and mix of dwelling types and complies with the policies and objectives of both the South Dublin County Development Plan 2010-2016 and the Sustainable Residential Development in Urban Areas Guidelines 2009, along with the best principles of urban design. We consider that the proposed development accords with the proper planning and sustainable development of the area and as such ought to be granted permission.

The applicant's design team has liaised with the various internal departments of SDCC to agree in principle details of planting, landscaping, drainage and roads/footpaths and as a result, the revisions to the scheme are put forward for permission.

We trust that all is in order and that you will consider this application favourably.

Yours faithfully,

Tracy Armstrong

Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Managing Director,
**Armstrong Fenton & Associates.**

**Enclosures:**

We enclose the following in support of this submission of Additional Information:

**Armstrong Fenton Associates:**

- Additional Information Response Letter
- Social Infrastructure Assessment

**Letter from Links Childcare dated 24/03/2022**

**Conroy Crowe Kelly Architects:**

- Drawing No. 2112 P 1001 Proposed Site Layout 1:500 A1
- Drawing No. 2112 P 1006 Taking in charge & management company 1:1000 A3
- Drawing No. 2112 P 1007 Taking in charge & management company (incl. services) 1:1000 A3
- Drawing No. 2112 P 2000 Site Location viz. Casement Aerodrome - 1:10,000 A1
- Drawing No. 2112 P 200 Contiguous Elevations and Site Sections - Sheet 1 1:200 A1
- Drawing No. 2112 P 201 Contiguous Elevations and Site Sections - Sheet 2 1:200 A1
- Drawing No. 2112 P 202 Contiguous Elevations and Site Sections - Sheet 3 1:200 A1
- Drawing No. 2112-P-DP-100 Duplex Block – Ground and First Floor Plans 1:100 A1
- Drawing No. 2112-P-DP-101 Duplex Block – Second Floor and Roof Plans 1:100 A1
- Drawing No. 2112-P-DP-200 Duplex Block – Elevations 1:100 A1

**TJ O'Connor & Associates Consulting Engineers:**

- Cover Letter /Report
- 21003-TJOC-ZZ-ZZ-RP-C-3702 Surface Water Management Plan C01 (A4 report)
- 21003-TJOC-ZZ-ZZ-DR-C-0064 Proposed Surface Water Layout Overall Plan C02
- 21003-TJOC-ZZ-ZZ-DR-C-0065 Proposed Surface Water Layout Sheet 1 C02
- 21003-TJOC-ZZ-ZZ-DR-C-0066 Proposed Surface Water Layout Sheet 2 C02
- 21003-TJOC-ZZ-ZZ-DR-C-0067 Proposed Permeable/Imperm. Sub Catchment Areas C02
- 21003-TJOC-ZZ-ZZ-DR-C-0080 Overview of Proposed SuDS Features C01
- 21003-TJOC-ZZ-ZZ-DR-C-0081 SuDS Features Cross Sections/Details – Sheet 1 C01
- 21003-TJOC-ZZ-ZZ-DR-C-0082 SuDS Features Cross Sections/Details – Sheet 2 C01

**Cunnane Stratton Reynolds Landscape Architects**

- Cover Letter /Report
- 21578-2-101 Landscape Masterplan Rev F
- 21578-2-102 Play Area Details Rev C
- 21578-2-103 Landscape and Services Rev C
- 21578-2-104 Boundary Treatment Rev C
- 21578-2-105 Tree Taken in Charge
- 21578-2-201 Roadside Elevation and Open Space Sections Rev D
- 21578-2-700 Planting Details
- 21578-2-701 Detail of Communal Tree Garden and SUDs Tree Pit
- Landscape Design Statement Rev C April 2022 (A3 report)

**Pinnacle Consulting Engineers:**

- Cover Letter Response
- P210514-PIN-XX-DR-D-0030-S1 Permeability Links Scale 1:500

**Bruton Consulting Engineers:**

- Stage 1 & 2 Road Safety Audit

Somerset House
Stradbrook Road
Blackrock
Co.Dublin
Email: info@linkschildcare.ie
Web: www.linkschildcare.ie

24/03/2022

Dear Sirs,

We are an established creche operated located at the entrance to Citywest Business Campus on the Old Naas Road.

The building we occupy is designated creche facility build as part of the overall Citywest Business Campus. Bright Horizons, the former operators of the creche, struggled to maintain the necessary occupancy levels despite increased levels of business and housing developments in the area. They left in August 2012 and Links Creche & Montessori Southside Limited took over.

We have never operated at capacity and do not believe the business could operate if another creche opened in the immediate vicinity. We currently have approx 10% capacity in our current facility with approx. 105 enrolled out of capacity of 120 and do not have a waiting list.

We understand you are prepared a planning permission for a residential development on the lands of Clondalkin Rugby Football Club. The las two years have been an extreme challenge for our business and staff, we would strongly urge you not to include a creche within the new scheme as it will financially upset the operation of our service and will result in job losses.

We trust you will carefully consider our views on this matter.

Yours sincerely