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Our Ref: KB

Job Ref: 2022

02 JUN 2022

1st June 2022

South Dublin County Council, Planning Department, County Hall Tallaght, Dublin 24, D24 A3XC.

South Dublin County Council Planning Department

Certified to be a true and accurate copy of the planning register.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



ADDITIONAL INFORMATION - SD21A/0290

Re: Development at the Combined Sites of 'The Priory' and 'Leabeg', Kiltipper Road, Oldbawn, Dublin 24.

Dear Sir or Madam,

We act as architects for the applicants, Peter Mc Verry Trust, in regard to the above and hereby respond to the notification of request for additional information for planning reference SD21A/0290, as issued by SDCC Planning Department on 17th of December 2021. Please find below the ten points raised by the planning department and the responses to each in BLUE, we note that supplementary drawings and documents have been attached to coincide with this written response. These are as follows:

- 1. (a) Regarding vehicular access on Kiltipper Road, it is considered that a proposal for a single access from the site, or retention of only the two existing accesses, would be appropriate. The applicant should provide a written rationale for the final proposal regarding vehicular access. The proposal should include sightlines which do not cross neighbouring properties or obstructions within the site. The Roads Department has sought the longer sightlines preferred by 'Transport Infrastructure Ireland'. However, noting that the character of this stretch of road is changing, and will soon accommodate buses, the standard of 65m provided in section 4.4.4 of DMURS may be acceptable. The applicant is requested to provide comments by way of additional information. (b) Alternatively, the applicant may wish to consider accessing the site from Elder Heath to the north, and provide revised plans in that regard and include consideration of the impact on open space. This would require also a letter of consent from the owners as that area has not yet been taken in charge.

FKP Response: Following issue of the AI request by South Dublin County Council, a meeting with SDCC Roads Department was organised for 22nd of February 2022. In attendance were John Hegarty (Senior Roads Engineer), Yasir Khan (Roads department) and Colm Maguire (SDCC Planning). At this meeting the merits of the location of the one proposed new entrance were discussed based on the sightlines provided in the original planning submission. SDCC Roads department requested use of the TII standard for sightlines but it was agreed that if the average speed (at the 85 percentile value) on this road was determined, showing that the posted speed was not being achieved, than the sightlines may be reduced accordingly as per the TII standard documents. In response to this agreement, the Peter McVerry Trust commissioned a road traffic survey for this area of road. Please find attached in Appendix A 'Irish Traffic Surveys' findings, updated to MCE sightlines drawing 0004\_PL4 and MCE roads report addressing this proposal.

Please note that point (b) has been explored as an option, however as this area has not been taken in charge by SDCC an agreement with the owners of the site to the north could not be secured in this timeframe.

- 2. With regard to the provision of pedestrian facilities, it is considered that pedestrian facilities are a necessity where intensification of development is proposed as with the subject application. This stretch of Kiltipper Road does not have footpaths either side of the carriageway. Approx. 100m to the east, a pedestrian crossing has been provided near the entrance to the Elder Heath estate, and a footpath provided on the southern side of Kiltipper Road, albeit behind an existing hedgerow. This brings pedestrians from Elder Heath into the public park. A number of alternative solutions present themselves: - A pedestrian crossing

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to bring residents directly into the public park to connect with the existing footpath; - A pedestrian footpath inside the site at its southern boundary to provide footpath here, which would extend eastwards if adjoining sites were developed; - Pedestrian access from the rear of the site into Elder Heath; or - A combination of the above. The applicant is requested to address the potential alternatives by way of additional information. The applicant is also requested to consult with the Roads and Economic Development regarding the feasibility of locating a pedestrian crossing here and legal consent to provide same as part of the proposed planning application.

**FKP Response:** Following issue of the AI request by South Dublin County Council, a meeting with SDCC Roads Department was organised for 22<sup>nd</sup> of February 2022. In attendance were John Hegarty (Senior Roads Engineer), Yasir Khan (Roads department) and Colm Maguire (SDCC Planning). At this meeting the following points were agreed with the roads and planning departments:

- Footpath to southern boundary - Footpath boundary buffer zone to the southern boundary to be allowed for at this stage but not constructed at this point. This is to facilitate future development and widening of Kiltipper road, at which time the southern footpath will be constructed on our site. The footpath is not to be constructed at this point as occupants risk crossing the road at unauthorised points in the road, which is not advisable. Area shown on FKP Site Plan P-100-C.
- Pedestrian crossing to Kiltipper park – It was agreed at the meeting of the 22<sup>nd</sup> of February 2022, that the proposed additional pedestrian crossing would not be provided at this point in the development. It was noted by SDCC roads department that this section of road will be widened in the future due to the increased transport link proposed on this road. Thus the proposed pedestrian crossing location is revoked.
- Pedestrian access route from Elder Heath - Please note that this point has been explored as an option, however as this area has not been taken in charge by SDCC an agreement with the owners of the site to the north could not be secured in this timeframe.

It should be noted that it is proposed that the pedestrian linking facilities at this site will be managed by the Peter McVerry Trust, whom will run a private shuttle bus from this facility to local amenity's as and when required. This service has been trialled and implemented successfully in other social housing developments by this applicant in recent years.

3. The Roads Department has sought design changes to ensure that a fire tender can access the rear of the site. In the event of permission being granted, a Fire Safety Certificate will be required. The applicant is requested to comment on this aspect of the proposal. The applicant should show consideration of this by way of additional information and provide revised plans if necessary. If the applicant is of the view that the layout as proposed would receive a fire safety certificate, no alteration to the plans is necessary.

**FKP Response:** Please find attached MCE Engineers auto-track drawing 0005-PL2 showing fire tender access being achieved in this scheme as requested.

4. (a) The location of the bin store within the site is considered to be detrimental to the residential amenity of unit No. 9. The applicant should attempt to improve this either by relocation of the bin store, relocation of the access doors to the store, or additional screening, or a combination of these measures. This should be addressed by additional information. (b) The applicant should also show where waste will be collected from the site and the size of bins to be used.

**FKP Response:** The comments of the planners have been taken on board with respect to the above comment. As a result the location of the bin store has moved away from the original proposed location at the side of unit no.9 and will now be positioned adjacent to the main entrance, screened in vertically timber clad to screen the area and accessed via the shared car parking area. The bin store has a combined area of 20.45sqm and facilitates 3-4no 1,100 lt storage bins. We note that it is the intention of the applicant to use current facility management staff to move the bins to the road edge on bin collection days and re-store the empty bins back in the bin store when this is completed. These areas are noted on the FKP Site Plan P-100-C.

5. (a) The proposed surface water attenuation of 81m<sup>3</sup> is undersized by approximately a factor of 1.6 for a 1 in 30 year storm event and undersized by approximately a factor of 2.3 for a 1 in 100 storm event. The applicant is requested to submit a revised report showing surface water attenuation calculations for the proposed development. The report should include the site area in hectares and areas of different surface types such as buildings, permeable paving, green areas in m<sup>2</sup> and their respective run off coefficients. Attenuation should be provided by SuDS (Sustainable Drainage Systems) where possible and where this is insufficient then attenuation can be provided by an arched type system. A concrete tank is not acceptable for attenuation due to maintenance issues. Example of SuDS include and not limited to: - Green roofs - Swales - Permeable paving - Rain gardens - Planter boxes - Grasscrete The report should include details of site specific rainfall data from Met Eireann, SAAR (Standard Annual Average Rainfall) value, Qbar



litres/second/hectare and soil value. (b) The applicant is requested to submit a drawing showing a revised surface water layout of proposed development. Show the type and size (Capacity in m3) of attenuation systems proposed. (c) The Environmental Services Department has also recommended the use of water butts.

**FKP Response:** Please find attached MCE Engineers drawing 0002-PL4 and reports Appendix B, C and D, addressing the attenuation queries raised in the above request for additional information.

6. The Bat Assessment Report recommends some mitigation measures which may impact on the design of the scheme. The applicant is requested to illustrate or comment on the implications of the 'Dark Skies' area and lighting requirements recommended in the report.

**FKP Response:** As noted within WSI report's recommendations for the continued safe commuting of bats across the site, we propose the following in the scheme as per WSI's recommendations:

- Inclusion of 2no 1FF Schwegler bat boxes, in locations noted on the FKP Site Plan P-100-C. Set at a height of 3m above finished ground level minimum.
- Inclusion of lower lantern style lighting with a lux of 0.1lux above 3m. A lower colour temperature will be proposed in the construction in line with recommendations.
- Areas of existing wilding and trees to be retained in the scheme and enhanced with species from the 'All-Ireland Pollinator Plan' list.

7. The Architect's Design Statement provides a number of CGI images in section 16. These images show the proposed development from inside the site. It would be useful to view similar images of the development as seen downhill from the Elder Heath estate. The removal of mature trees on the site will impact the landscape character at this site, which in a transitional area between urban South Dublin and the Athgoe and Saggart Hills landscape areas. The applicant is requested to provide relevant images and commentary via additional information.

**FKP Response:** Please find attached additional FKP CGI views drg P-900 showing views from the requested angles towards the proposed scheme.

8. The proposed development includes minimum private amenity space at 5sq.m per unit. It is considered reasonable to reach a compromise regarding amenity standards subject to details in relation to the proposed resident groups and a proposed agreement in relation to restricting the use and future sale. Please note Section 11.3.1 of the County Plan in relation to reduced standards on infill sites for specific groups. It is considered individual units should at least be provided with defensible privacy strips, either landscaped or fenced amenity spaces, around the outside of the unit on each side. Furthermore, while it is recognised that secure private spaces might not be in the applicant's view the best solution, the provision of low-fenced areas for each block, providing a degree of segregation and a shared amenity space among neighbouring residents, may be a more equitable compromise than to simply provide open and undefined space on all sides of the development. The applicant should consider their approach in this regard and provide a response as additional information.

**FKP Response:** Please note, that although it may not have been clear on the previous proposal, it is proposed to provide 5sqm private amenity space per unit in this development scheme. Each of the private spaces will be a rear terraced area, 5sqm minimum, and accessible from the rear of each property. This has been updated and denoted on the FKP Site Plan P-100-C for clarity.

9. Section 11.3.2(i) Infill Sites of the Development Plan outlines that: 'Proposals to demolish a dwelling(s) to facilitate infill development will be considered subject to the preservation of the character of the area and taking account of the structure's contribution to the visual setting or built heritage of the area.' In this context, the demolition of the existing habitable dwelling has not been justified by the applicant. The retention of the existing building and its subdivision into 1-bed units should be considered. The applicant is requested to respond to this via additional information.

**FKP Response:** The above comments in relation to the retention of existing habitable dwellings have been considered by the applicant. The revised proposal is to now retain the existing 'Leabeg' single storey dwelling, remove later single storey extensions and sub-divide the existing house into 2no single occupancy units. Total units proposed on the site (including this sub-divided existing unit) remain at 10no total. Please find attached FKP site plan, site sections and house types showing compliance with the minimum requirement sizes for this unit type.

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10. It is noted that third parties have raised concerns in relation to the hostel use in 'The Priory' house. The most recent permission at the site does not provide for a change of use from dwelling house to hostel, and there is no record of a Section 5 declaration request as to whether such a change of use would be exempted development or not. It should be noted that there is no obligation on the applicant to apply for a Section 5 declaration under the 2000 Planning Act regarding exempted development. The applicant is requested to provide additional information to clarify. The submission should include information on the number of rooms, number of staff, and the capacity of the hostel to aid the assessment of the subject application.

**FKP Response:** The applicant notes that the comment regarding the use of the facility as a hostel is not correct. Having reviewed the comment with our client they have confirmed the following.

Peter McVerry Trust is currently reviewing the occupancy of the "Priory House" in line with the use described under Schedule 2, Exempted Development, Class 14, (f) of the Planning and Development Regulations 2001. i.e as this facility is being used as a residence for persons with intellectual and physical disabilities or mental illness' not exceeding six persons total and being cared for by no more than two persons total.

**Additional Information Request Submission Documents**

In support of our application we submit copies of the following:

a) 6 No copies of Architects drawings:

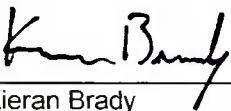
Drawing No	Description	Scale	Size
20-23-P-100-A	Site Location Map & Proposed Site Plan	1: 2500 / 1:200	A1
20-23-P-110-A	Landscape Plan	1:200	A1
20-23-P-200-A	Existing Site Plan with Demolition	1:200	A1
20-23-P-250-A	Existing Site Sections	1:200	A1
20-23-P-251-A	Existing House Plans	1:200	A1
20-23-P-300-A	Proposed House Types Sheet 01	1:100	A1
20-23-P-301-A	Proposed House Types Sheet 02	1:100	A1
20-23-P-400-A	Proposed Contiguous Elevations	1:200	A1
20-23-P-900	Proposed CGI Views	NTS	A3

b) 6 copies of MCE Consulting Engineers drawings and report as follows:

1. 6 copies of Drawings no 5565-02, no 5565-04, and no 5565-05.
2. 6 copies of MCE Further Information Report (A4 document)
3. 6 copies of Combined Appendix (A4 document):
  - Appendix A: Irish Traffic Surveys Report
  - Appendix B: Attenuation Flow Calculations
  - Appendix C: MCE Attenuation Calculations
  - Appendix D: Preliminary Attenuation Tank Details

We trust that the foregoing and the enclosed are satisfactory, but should you have any queries regarding this application, please contact the undersigned.

Yours sincerely,



Kieran Brady

FITZGERALD KAVANAGH + PARTNERS  
 c.c. Mr Pat Doyle CEO of the Peter Mc Verry Trust  
 Francis Doherty of the Peter McVerry Trust  
 Colm Redmond of Fitzgerald Kavanagh + Partners