



25th May 2022

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



RE:

**PERMISSION SOUGHT FOR MODIFICATIONS TO A PERMITTED RESIDENTIAL DEVELOPMENT
(UNDER REF. SD17A/0468) KNOWN AS "BALLYCULLEN GATE", FIRHOUSE, DUBLIN 24.**

Dear Sirs,

1.0. Introduction

- 1.1.** On behalf of our client (the applicant), Capami Ltd. we, Armstrong Fenton Associates, wish to apply for permission for development consisting of modifications to part of an extant permission previously granted permission under planning Ref. SD17A/0468.
- 1.2.** The permitted development includes for the construction of 64 no. dwellings, has the approved name of "Ballycullen Gate" and is located south of Oldcourt Road, Firhouse, Dublin 24.
- 1.3.** The subject application seeks permission for a change of house type and increase in number of units from that already permitted under Ref. SD17A/0468. The permission being sought is detailed below as per the public notices for the application:

Capami Ltd. seeks permission for development on a site located south of Oldcourt Road, Firhouse, Dublin 24, which forms part of an overall permitted residential development under Ref. SD17A/0468 & has the approved name of "Ballycullen Gate". The proposed development consists of a change of dwelling type from 17 no. permitted houses to 26 no. proposed houses. The proposed dwellings are comprised of 12 no. 3 bed semi-detached 2 storey houses, 6 no. 2 bed semi-detached dormer houses, 6 no. 2 & 3 bed detached & semi-detached bungalows, 1 no. 3 bed detached 2 storey house and 1 no. 4 bed split level detached house. The proposed development also includes for all associated site development works, car parking, open spaces and landscaping, on a site area of 0.82ha. The effect of the proposed development will be a modification to an extant permission under Ref. SD17A/0468.



2.0. Development Context

2.1. Site Context

2.1.1. The application site is located within the lands subject to the Ballycullen-Oldcourt LAP 2014. The site is located south of Oldcourt Road, Firhouse, Dublin 24, and forms part of an overall permitted residential development previously granted permission under Ref. SD17A/0468, which has the approved name of "Ballycullen Gate".

Ref. SD17A/0468 permitted the development of 64 no. dwellings, together with all associated site development works, with works on site having recently commenced. Development permitted under Ref. SD17A/0468 formed another parcel of our client's (the applicant's) overall land holding within the boundaries of the Ballycullen-Oldcourt Local Area Plan 2014 (hereafter 'LAP').

Phase 1 of development of our client's lands was granted permission on 31st July 2015 under Ref. SD14A/0180 for 137 no. dwellings. This development is known as Dodderbrook and is located to the north-west of the application site. To the immediate west of Phase 1 of Dodderbrook, Phase 2 of Dodderbrook was granted permission on 23rd January 2018 under Ref's SD17A/0121 & PL 06S.249294 for 133 no. dwellings. Furthermore, to the south of the two aforementioned permitted Dodderbrook developments and traversing part of the Ballycullen Gate site is the proposed Main Link Street to serve the Ballycullen-Oldcourt LAP lands which was granted permission on 2nd July 2018 under Ref's. SD17A/0041 & PL 06S.249367. This permission allows for access to the subject site via Oldcourt Road.

2.2. Site Location

2.2.1. The application site is located south of Oldcourt Road, Firhouse, Dublin 24, within the lands subject to the Ballycullen-Oldcourt LAP and within the permitted Ballycullen Gate development.

To the south of the site are existing overhead ESB wires, while to the north-west is the residential development of Dodderbrook. East of the site are additional greenfield lands, including the Oldcourt Hill Farm Allotments, while to the north, on the opposite side of Oldcourt Road, are residential developments known as Beechdale and Daletree. Also, on the opposite side/north of Oldcourt Road, to the north-east, is an existing Lidl supermarket.

The subject site will be accessed from Oldcourt Road, via the permitted access road (granted permission under Ref. SD17A/0468) that ties in with the permitted Main Link Street (granted permission under Ref.s SD17A/0041 & PL06S.249367).

2.3. Site Description

2.3.1. The overall site subject to the extant permission Ref. SD17A/0468 occupies an area of c. 3.8 hectares and is bounded to the west by third party, undeveloped, greenfield lands and to the east by additional (separate) third party, undeveloped, greenfield lands.

To the south, are additional greenfield lands which are unzoned and do not form part of the LAP. To the west/south-west are overhead 220Kv power lines. The eastern and southern boundaries of the site are defined by existing hedgerows, which will be maintained, as illustrated on the enclosed site layout plan, and permitted under Ref. SD17A/0468.

Though works on the permitted Ballycullen Gate (under Ref. SD17A/0468) have recently commenced the subject site generally remains in greenfield condition at the time of application.



3.0. Planning Context

3.1. South Dublin County Development Plan 2016-2022

- 3.1.1. The application site is zoned objective "ResN": *"To provide for new Residential Communities in accordance with approved Area Plans"* in the existing South Dublin County Council Development Plan 2016-2022 (hereafter 'CDP').

The vision of the CDP in relation to new urban development seeks to ensure that: *"all new urban development in the County will create or contribute to sustainable neighbourhoods in which people can work, shop and access amenities, recreation and education within their own locality"*. It is notable to this extent that the subject lands form part of a Local Area Plan for the entire Ballycullen-Oldcourt area,

The CDP also sets standards for residential development including dwelling sizes, public and private open space provision and car parking provision etc. The subject application seeks permission for changes of house types and an increase in number of units permitted under Ref. SD17A/0468, however, the proposed development complies with all standards contained in the CDP, as appropriate, and the development put forward for permission, in terms of its layout, mix of units and building height takes into consideration the locational context and history of the site and the requirements of the LAP.

3.2. Ballycullen-Oldcourt Local Area Plan (2014)

- 3.2.1. The Ballycullen-Oldcourt Local Area Plan 2014 (hereafter 'LAP') forms the basis for the development of approximately 90 hectares (222 acres) of land along the Ballycullen-Oldcourt fringe, which are in the majority zoned objective "ResN" for new residential development within the CDP.

The overall objective of the LAP is to provide a development framework with residential densities appropriate to the unique location of the lands on the suburban edge of Dublin and at the foothills of the Dublin Mountains. The LAP provides for the construction of approximately 1,600 additional dwellings (catering for about 4,600 persons) at a range of densities appropriate to the area.

The overall LAP lands are subject to a number of development constraints such as wayleaves for existing watermains and overhead ESB wires, extant planning permissions and areas of steep topography. While the site subject to this application for permission is free from the aforementioned constraints, their presence across the entire LAP area has resulted in the Plan lands being categorised into three areas for purposes of developing a sequenced rationale, namely: highly constrained, partially constrained or relatively unconstrained.

Figure 1, over, illustrates the areas of constraints. Light shades indicated "Highly Constrained" and dark shade indicates "Relatively Unconstrained".



Fig. 1 – Extract from LAP (Fig 4.1 of same) identifying “Development Areas Rationale”

The subject site is identified as being a “Partially Constrained Area”. The LAP states that these areas: *“relate largely to the upper slopes along the southern fringe of the Dublin Mountains where there is a relatively steep topography and the lands become visually prominent”*.

The LAP also states that: *“on the western side of the Plan Lands the partially constrained areas occur mostly above the 108 metre contour to the south of the watermain”*.



Fig. 2 – Extract from LAP (Fig 4.6 of same) identifying “Land Use & Density Rationale”

The LAP also sets out a land use and density rationale which reflects the “ResN” zoning for the majority of the lands. Land uses and densities are directed within three distinct areas, where the extent of development will vary depending on its location and setting in relation to the suburbs and the Dublin Mountains/countryside. The three character areas comprise: (i) the lower slope lands, (ii) the mid slope lands and (iii) the upper slope lands. The subject site traverses two of these zones, i.e. the “Mid Slope Lands” and the “Upper Slope Lands”.

The “Mid Slope Lands” generally correspond with the “Partially Constrained” lands and are located in areas: *“where the slope of the topography begins to accelerate towards the upper slopes”* and *“generally runs midway across the entirety of the Plan Lands in a linear manner”*. Development within this area will primarily comprise low density residential development.

The “Upper Slope Lands” also generally correspond with the “Partially Constrained” lands. These lands are elevated and rise towards and beyond the 120 metre contour. The “Upper Slope Lands” run closely along the entire southern fringe of the Plan Lands with the Dublin Mountains and is considered to be an area that is highly sensitive to development in terms of visual impact and impact on natural drainage. Development within this area



will primarily comprise very low density residential development.

Judicious consideration has been paid to the locational context of the site and the planning history attached to same, as well as the requirements of the LAP, and it should be noted that none of the proposed dwellings lie beyond/above the 120m contour line.

4.0. Planning History

4.1. The most relevant permission to the subject application is Ref. SD17A/0468 as it is the parent extant permission for development on the subject site, details of same can be found below:

- **Ref. SD17A/0468** - Permission was granted on the 22nd October 2018 for 64 dwellings, comprised of 16 no. apartments and 48 no. houses, together with all associated site development works. Construction of same has recently commenced and the subject application seeks minor modification to this permission i.e., changes of house type and an increase in the number of units permitted.

4.2. The following is a synopsis of the most relevant planning history attached to the adjoining / surrounding lands:

- **Ref.s SD17A/0041 & PL06S.249367** - Permission was granted to HWBC Allsop and Capami Ltd on the 2nd July 2018 for the development of the Main Link Street shown in the Ballycullen - Oldcourt LAP, with access onto the Oldcourt Road at Gunny Hill to the east and the Bohernabreena Road to the west. The Link Street consisted of a single 7 meter wide carriageway including footpaths, cycle paths, bus bays, traffic calming measures, public lighting and tree planted grass margins having total length of approximately 1,516 meters on a net development area of approximately 7.7ha and provides access and connections to lands designated for residential development in the Ballycullen-Oldcourt LAP. The Link Street incorporates pipes and ducts to accommodate for future services including surface water attenuation and other piped and wire services. This permission allows for access to the subject site via Oldcourt Road.
- **Ref. SD14A/0180** – Permission was granted to Capami Ltd. on the 31st July 2015 for a residential development comprising of 137 no. dwellings on a site area of 4.82 hectares, located south of Oldcourt Road, Oldcourt, Firhouse, Dublin 24. Access to the development was via a proposed new vehicular entrance from Oldcourt Road. The development comprised 4 no. 4 bed 2 storey detached houses, 101 no. 3 & 4 bed 2 storey semi-detached houses, 25 no. 3 bed 2 storey terraced houses and 8 no. apartments in 4 no. 2 storey end of terrace units and included all associated site development and infrastructural works, car parking, open spaces and landscaping. The grant of permission provided for the development of 135 no. dwellings which formed Phase 1 of the development of our client's lands, known as Dodderbrook.
- **Ref. SD17A/0121 & PL 06S.249294** - Permission was granted to Capami Ltd. on the 23rd January 2018 for a residential development consisting of 133 no. dwellings and a crèche on a site area of 4.64 hectares (11.4ac), located south of Oldcourt Cottages and north of the ESB wires in the townland of Bohernabreena, Oldcourt, Ballycullen, Dublin 24. The development provided for a new access point via an adjoining residential development known as Dodderbrook (permitted under Reg. Ref. SD14A/0180) which is accessed from Oldcourt Road. The proposed development comprised of 3 no. 4 bed 2 storey detached houses, 90 no. 3 & 4 bed 2 storey semi-detached houses, 27 no. 3 bed 2 storey terraced houses and 6 no. 3 bed duplexes with 3 no. 2/3 bed duplex apartments in a 3 storey building and 4 no. 2 bed apartments over two floors and a 2 storey crèche (423m²). The proposed development also included for all associated site development and infrastructural works, surface water with attenuation, piped and wired services, car parking, open spaces and landscaping etc. This permitted development represents Phase 2 of Dodderbrook construction and lies to the west of Phase 1.

4.3. The following sets out a history of other permissions in the environs, i.e., the western part of the Ballycullen – Oldcourt LAP lands:



- **Ref. SD15A/0150** - on 27th January 2016 permission was granted to HWBC Allsop for the construction of 79 no. two storey houses, a new vehicular access from Oldcourt Road, pedestrian access routes, internal roads and footpaths, open space including children's play area, boundary treatments, hard and soft landscaping, changes in levels, ancillary surface water attenuation areas and all site development works above and below ground at Oldcourt Road, Ballycullen, Dublin 24. This permitted development lies to the northeast of the application site and is known as Ballycullen Green and is completed.
- **Ref. SD18A/0025** - permission was granted on 5th June 2018 for amendments to the aforementioned Ballycullen Green, i.e. Ref. SD15A/0150, resulting in a change of house type and increase in number of units.
- **Ref. SD16A/0059** - on 9th November 2016, permission was granted to Capami Ltd. for the development of a playing pitch, including associated site works, on a site area of 1.97 hectares, located at Gunny Hill, on Oldcourt Lane, south of Oldcourt Road. This application was the subject of an appeal to An Bord Pleanála who granted permission for same on 3rd April 2017 under Ref. PL06S.247693. The playing pitch has been completed.
- **Ref.s SD19A/0104 & ABP-305800-19** - In March 2019, the applicant submitted an application for permission to South Dublin County Council for the development of 24 no. houses on an infill site, located south of Oldcourt Road, to the northeast of and adjacent to Dodderbrook Phase 1. As a result of revisions to scheme required by Additional Information, permission was granted for 21 no. dwellings. The decision to grant permission was the subject of a third party appeal, however, An Bord Pleanála upheld the decision to grant permission, issuing an order on to grant on 30th March 2020 for 21 no. dwellings.

5.0. Social & Affordable Housing (Part V Requirements)

5.1. It is the applicant's intention to fully comply with the requirements of South Dublin County Council's Housing Department in relation to the provision of social and affordable housing (Part V) in the event of a condition for the provision of same being attached to any forthcoming grant of permission for this development.

For the purposes of validating of the subject application, we enclose the necessary details in relation to Part V – please refer to the submitted Part V proposal document, prepared by P.K. O'Brien & Associates, and Part V proposal drawing, Drawing No. 2205-COHT-105 "Proposed Part V Provision" prepared by Davey + Smith Architects, which are enclosed with the subject application for further details.

5.2. The enclosed Part V details outline that the applicant is proposing to offer 5 no. houses comprised of 5 no. 2 bedroom bungalows as social & affordable housing. This proposal represents 20% of the total 26 no. dwellings proposed within the subject application (i.e., 17 no. changes of house type plus the addition of 9 no. additional houses to that already permitted under Reg.Ref. SD17A/0468). This proposal is put forward for purposes of validating the subject application **only** and is made in compliance with the provisions of Part V of the Planning & Development Act as amended by the Affordable Housing Act 2021.

5.3. It should also be noted that the subject application is an amendment to an extant permission for 64 no. dwellings, granted under Ref. SD17A/0468, which the applicant has already agreed to provide 6 no. permitted dwellings (representing 10% of the total no. of permitted dwellings) to South Dublin County Council as social housing. As such, given the nature of the subject application and the changes to Part V of the Planning & Development Act as amended by the Affordable Housing Act 2021 in the time since the extant permission was granted permission, it is considered that the applicant and South Dublin County Council's Housing Department will require further consultations in relation to Part V compliance upon receipt of a grant of permission for the subject application. This is generally standard procedure whereby units to be acquired and acquisition prices etc. are to be agreed subsequent to a grant of permission and prior to lodgement of commencement notice, and in accordance with the requirements of the Housing Department.



6.0. Proposed Development

6.1. Introduction

- 6.1.1. The subject application seeks permission for changes of house type and increase in the number of units from that already permitted under extant permission Ref. SD17A/0468.
- 6.1.2. That extant permission caters for 64 no. dwellings comprised of 16 no. apartments and 48 no. houses. The subject application will affect 17 no. permitted houses by replacing same with 26 no. proposed houses (i.e., an increase in the permitted number of units from 17 no. houses to 26 no. houses thereby increasing the total number of units on the site relevant to extant permission Ref. SD17A/0468 from 64 no. dwellings to 73 no. dwellings).
- No changes to the apartments are proposed and the site layout plan including roads and open spaces etc. will remain generally unchanged.
- 6.1.3. Access to the proposed development will be from Oldcourt Road, via the permitted Main Link Street (granted under Ref's SD17A/0041 & PL06S.249367) and the permitted vehicular entrance into site off same (granted under Ref. SD17A/0468), with alterations to same proposed as part of this application.
- 6.1.4. The development put forward for permission fully respects the context and topography of the site and proposes the development of low density family type housing. The proposed housing is comprised of traditional forms and materials that will complement the existing character of the environs and is respectful of its setting in relation to views to the Dublin Mountains to the south and to the permitted houses granted under Ref. SD17A/0468.

6.2. Schedule of Accommodation

- 6.2.1. This application seeks permission for the development of 26 no. dwellings consisting of changes of house type and increase in the number of units on a permitted site. The house types proposed are all permitted in principle on the site. The schedule of accommodation consists of 2 no. 3 & 4 bed detached houses, 18 no. 2 & 3 bed semi-detached houses & 6 no. 2 & 3 bed bungalows.
- 6.2.2. The proposed housing mix reflects the LAP requirement for low to medium density residential development on these mid and upper slope lands whilst providing for family orientated housing which caters for different lifecycle stages as well as consumer choice. Dwelling sizes range from the 2 bed bungalow at 83 sq.m up to 4 bed detached house at 161 sq.m. The proposed mix of housing types is put forward in consideration of the Local Authority strategy for residential development (Section 2.2.4 of the Development Plan) which states: *"provide for changing household sizes and promote an appropriate mix of dwelling types, sizes, and tenures and different densities to empower personal choice and to meet the needs of different lifecycle stages and facilitate the creation of balanced communities"*. Furthermore, consideration has also been paid to the requirement of the LAP that the housing mix across the Plan lands: *"should vary in a manner that responds appropriately to the varying contexts including existing suburban development, the differing topography and proximity to the rural and mountain edge"*.

Table 1 over provides a breakdown of the proposed schedule of accommodation and overall floor area of residential development – please refer to same.



Unit Type	Description	No. of Units	Floor Area (Sq.m)	Total Floor Area (Sq.m)
A	3 bed semi-detached 2 storey house	11	111	1,221
A1	3 bed semi-detached 2 storey house	1	113	111
B	2 bed semi-detached 2 storey dormer house	6	97	582
C	3 bed bungalow	1	96	96
C1	2 bed bungalow	1	83	83
C2	2 bed bungalow	2	83	166
C3	3 bed bungalow	2	96	192
D	3 bed detached house	1	111	111
E	4 bed detached house	1	161	161
Total	-	26	-	2,723

Table 1 - Proposed Schedule of Accommodation

6.2.3. All space provisions and sizes comply with the targets and standards as set out in the Quality Housing for Sustainable Communities Guidelines, DEHLG 2007 with regard to minimum room sizes, dimensions and overall floor areas. All floor areas comply with the South Dublin County Council Development Plan minimum space standards for houses and apartments. A breakdown of the space provisions and room sizes for each unit is contained in Appendix B of this report – please refer to same.

6.3. Dwelling Design & Mix

6.3.1. The site is identified in the Ballycullen-Oldcourt Local Area Plan (2014) Fig 4.6 (page 22) as being located within the Mid slope Lands (northern section of site) and upper Slope lands (southern section of the site). Section 4.6.2 of the Local Area Plan states that development within mid slope lands will primarily comprise low density and upper slope land very low density. Required densities for these lands are shown in Table 5.4 of the Local Area Plan (page 30):

- Mid slope lands require 22-28 dwellings per ha (Net Average Density)
- Upper slope lands require 12 -18 dwellings per ha (New Average Density)

The permitted residential density on this site is c. 16 no. units per hectare gross and 27 no. units per hectare net. based upon a "blended" density of development given that the overall site straddles two zones i.e., mid and upper slope lands. The permitted development Ref. SD17A/0468 provides for 64 no. units. The effect of the current application is to modify some of the permitted house types and to increase the overall number of dwellings on site by 9 no. units, therefore the impact on the permitted residential density of development is negligible and remains compliant with the provisions of the Ballycullen – Oldcourt LAP.

6.4. Building Height & Design

6.4.1. The proposed buildings are 1 & 2 storey and are in accordance with the pattern of development and are respectful of the character of the area of development and the Ballycullen – Oldcourt LAP 2014.

6.5. Public and Private Open Space

Public Open Space

6.5.1. The quantum of public open to be provided is not changing from the permitted site layout Reg. Ref. SD17A/0468. The permitted public open space provision complies with the development standards of the South County Dublin



Development Plan 2016-2022. There will be no impact on the permitted public open space as a result of the proposed development.

Private Open Space

6.5.2. Private amenity space for the proposed houses will be provided in the form of rear gardens located behind the rear building line of each dwelling. The orientation, relationship and separation of dwellings has been carefully considered to ensure that solar gain is maximized.

The proposed house types provide for direct access and visual connection between the kitchen / dining areas of both the houses and duplex units and their associated rear private amenity spaces.

The size of private rear gardens has been designed to comply with the minimum requirements of the CDP and accordingly the minimum standards set out in Table 11.20 i.e., 55 sq.m for 2 bed houses, 60 sq.m. for 3 bed houses and 70 sq.m for 4-bed houses.

6.6. Car Parking

6.6.1. Car parking for the proposed development takes the form of in-curtilage parking for 2 no. houses, i.e., 2 no. spaces each. The total proposed car parking provision (in-curtilage) is 52 no. spaces.

7.0. Infrastructural Services

7.1. Proposals for the provision of relevant services / infrastructure have been prepared by Pinnacle Consulting Engineers. Please refer to the enclosed drawings for details.

8.0. Other Considerations

8.1. The subject application seeks permission for changes of house type and increase in the number of units from that already permitted under extant permission Ref. SD17A/0468.

8.2. The proposed development will affect 17 no. permitted houses by replacing same with 26 no. proposed houses. The proposed development **does not** seek changes to the permitted apartments granted under Ref. SD17A/0468 and the permitted site layout plan including roads and open spaces etc. will remain generally unchanged

8.3. The application assessed and granted permission by the Planning Authority under Ref. SD17A/0468 included for / considered: pedestrian & cyclist connections, flood risk assessment, appropriate assessment & biodiversity, childcare needs, school needs and phasing. It is considered that the proposed development does not substantially change that already permitted under Ref. SD17A/0468 with regard to these aforementioned reports / considerations.

9.0. Conclusions

9.1. The proposed development is permitted in principle as part of the overall permitted Ballycullen Gate residential development granted under Reg. Ref. SD17A/0468.

9.2. The proposed development now put forward for permission consists of 17 no. changes of house type and an



increase of 9 no. units from that permitted under Ref. SD17A/0468 (i.e., 26 no. dwellings total). The proposed 26 no. dwellings consist of 2 no. 3 & 4 bed detached houses, 18 no. 2 & 3 bed semi-detached houses & 6 no. 2 & 3 bed bungalows.

- 9.3. The proposed development is planned with the receiving environment in mind and respects the overall context and environs of the site location and is consistent with the CDP and the Ballycullen-Oldcourt LAP policies and objectives.
- 9.4. The proposed dwellings comprise a high standard of residential development in accordance with best practice guidelines of the Quality Housing for Sustainable Communities documents (2009) and the CDP. The design of the proposed dwellings is put forward with regard to permitted design of dwellings granted under Ref. SD17A/0468.
- 9.5. The proposed development does not affect the permitted public open space granted under Ref. SD17A/0468. The proposed gross floor areas of the dwellings, as well as the proposed car parking and private open space provisions remain consistent with the required standard of the existing CDP.
- 9.6. We trust that the Planning Authority will give due consideration to the merits of our application, and we look forward to a favourable decision in due course. Please refer to the page over for a full list of enclosures accompanying the application.

Yours sincerely,

Alan Fenton,
Planning Consultant
Armstrong Fenton Associates.
Planning & Development Consultants



10.0. Enclosures

We enclose the following drawings and details in support of the subject application:

- **Planning Fee** – a cheque for the appropriate planning application fee made payable to South Dublin County Council for the sum of €1,690.00 (26 no. dwellings x €65.00).
- **Planning Application Form** – one copy of completed South Dublin County Council planning application form, signed, and dated.
- **Public Notices** – one copy of the newspaper notice from The Irish Daily Star as published on 23rd May 2022 & one copy of the site notice (A4) dated 23rd May 2022, 1 no. copy of which is posted on site as indicated on the submitted "Site Location Map" and "Proposed Site Layout COHT" drawings prepared by Davey + Smith Architects i.e., Drawing No's. 2205-COHT-101 & 2205-COHT-103. The notices are posted and published in full compliance with articles 17, 18 and 19 of the Planning and Development Regulations 2001 and 2011.
- **Part V** – one copy of the proposal outlining applicant's Part V compliance prepared by P.K. O'Brien & Associates.
- **Drawings/ Details** – six copies of the following drawings and details are enclosed, prepared by the following parties:

Prepared by Armstrong Fenton Associates:

Drawing No.	Title	Scale
N/A	Cover Letter / Planning Report	A4 Document

Prepared by Davey + Smith Architects:

Drawing No.	Title	Scale
2205-COHT-101	Site Location Map	As Shown@A3
2205-COHT-102	Permitted Site Layout	As Shown@A1
2205-COHT-103	Proposed Site Layout COHT	As Shown@A1
2205-COHT-104	Proposed Contiguous Elevations and Site Section	As Shown@A0
2205-COHT-105	Proposed Part V Provision	As Shown@A1
2205-COHT-PH 01	House Type A -3B- Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 02	House Type A1 -3B- Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 003	House Type B - 2B - Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 04	House Type C - 3Bed - Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 05	House Type C.1 - 2B - Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 06	House Type C.2 - 2B - Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 07	House Type C - 3B - Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 08	House Type D - 3B - Plans, Section, Elevations	As Shown@A1
2205-COHT-PH 09	House Type E - 4B - Plans, Section, Elevations	As Shown@A1



Prepared by Pinnacle Consulting Engineers:

Drawing No.	Title	Scale
N/A	Cover Letter	A4 Document
P190302-252	Proposed Watermain	1:500@A1
P190302-253	Proposed Foul & Surface Water Drainage Layout Sheet 1 of 2	1:500@A1
P190302-254	Proposed Foul & Surface Water Drainage Layout Sheet 2 of 2	1:500@A1
P190302-204	Drainage Details	As Shown@A1
P190302-205	Water Details	As Shown@A1



Appendix A - Design Statement

1.0. Introduction

This Design Statement was previously prepared in support of the planning application for the now permitted 64 no. dwellings granted under Ref. SD17A/0468.

Section 11.2.1 "Design Statements" of the South Dublin County Development Plan 2016-2022 requires a design statement for developments of over 10 no. dwellings. The subject application is considered to represent a minor modification to the permitted Ref. SD17A/0468 and, as such, it is considered that the below statement is appropriate for the subject application. This statement contains a Site Analysis, Concept Plan and Design Statement which are described in the following sections.

2.0. Site Analysis

2.1. Site Location

The subject site is located to the south of the Oldcourt Road, in the townland of Oldcourt in South County Dublin. The application site is an undeveloped tract of land that is adjoined by a third party owned, undeveloped piece of land to the immediate north-west. However, further north-west our client is delivering a permitted residential development known as Dodderbrook. The south-eastern and southern boundaries of the site are defined by existing hedgerows. The aforementioned lands are all subject to the Ballycullen – Oldcourt LAP 2014 which designates the application site for low density residential development.

2.2. Character Appraisal

The subject lands are located on the southern periphery of the development area of south-east Tallaght and along the southern development fringe of South County Dublin. Development to the east and north is generally characterized by medium density housing with some lands designated and developed for local centre and educational uses.

The lands slope downwards in a northerly direction and enjoy views over the Dublin Mountains. The eastern and southern boundaries comprise trees and hedgerows typical of rural field boundaries.

2.3. Movement Analysis

As previously noted, the subject lands are located in the western part of the Ballycullen – Oldcourt LAP lands, along the southern development fringe of the County. The lands are located approx. 3-4km by road from Tallaght Town Centre and the Red Luas Line Terminus, which offers a high frequency public transport service to and from Dublin City Centre and Citywest Business Campus. The terminus is within convenient cycling distance of the subject site.

The proposed development site is located within the Ballycullen – Oldcourt LAP area, which sets out a streets rationale that seeks to open up the permeability of the Plan lands including the upgrade of Stocking Avenue, Hunters Road and Oldcourt Road which will act as a primary route for movement across the overall LAP area and to areas outside the Plan lands. It is envisaged that these existing upgraded streets will be augmented by the new Main Link Street that will connect Oldcourt Road and Bohernabreena Road (granted under Ref.s SD17A/0041 & Ref. 06S.249367. These streets will be fed by Local Link Streets.

The application site is separated from a new residential development known as Dodderbrook to the north-west by



undeveloped third party lands, however, Dodderbrook contain Local Link Streets that will allow for connectivity to adjoining lands, in compliance with the objectives of the LAP. The layout now put forward for permission also provides for connections into the adjoining third party lands which will open up the lands for residential development. With further development throughout the LAP area, the network and hierarchy of streets will help ensure that linkages can be created between various neighbourhood blocks. The layout of the proposed development put forward for permission also provides for future access to the adjoining lands within the LAP area.

To the east of the proposed development site, the eastern part of the LAP area is served by relatively high frequency bus services in the form of the 15 and 15b bus routes, which were introduced to the area in 2011. These bus routes serve Dublin City Centre at a combined peak time rate of approximately 9 buses per hour and terminate on Ballycullen Road and Stocking Avenue. The western areas of the Plan Lands are not directly served by public transport, however, the delivery of the Main Link Street can accommodate bus services which will provide for public transport services in the environs in the future. Some of the lands in the western area are within walking distance of the 15 and 15b bus services, along with the 65b bus service, which operates between Citywest Business Campus and Dublin City Centre. Further detail including the frequency of bus services is provided in the Transport Statement prepared by DBFL Consulting Engineers and included with this application.

The following is a synopsis of the location of the proposed development site in terms of the services / facilities that will serve residents of this proposed development:

2.3.1. Schools

There are a number of primary and secondary level schools in the locality of the site which are listed below. The South Dublin County Council Development Plan, 2016-2022 designates a primary school site adjacent to Stocking Wood. A second primary school site is designated under the Ballycullen-Oldcourt LAP between Gunny Hill and Oldcourt Lane adjacent to a planned park and playing fields.

National Schools:

- Scoil Carmel Junior School
- Scoil Treasa Senior School
- Oldcourt / Allerton (Holy Rosary)

Secondary Schools:

- Firhouse Community College
- Knocklyon – Saint Colmcille’s Community School

In regard to the phasing and provision of a school, for which there is no longer a short term need for same by the Department of Education, however, there is a designated site for a future school at Gunny Hill within the LAP lands and it is therefore put forward that this application is in compliance with the phasing requirements pertaining to the provision of a school site within the LAP.

2.3.2. Public Transport

The subject lands are located approximately 10 kilometres by road to Dublin City Centre and approximately 3-4 kilometres by road to Tallaght Town Centre and the Red Luas Line Terminus. The Red Luas Line terminus in Tallaght offers a high frequency public transport service to and from Dublin City Centre and Citywest Business Campus and is considered to be within convenient cycling distance.

The Oldcourt Road from which the proposed development will be accessed is not served by public transport but the LAP provides for a new Main Link Street which is adjacent to the application site and which will provide for



access to the proposed development as envisaged in the LAP, which is likely to be served by bus. To the east of the site at present the area is served by relatively high frequency bus services in the form of the 15 and 15b bus routes, which serve Dublin City Centre. The subject site is also within walking distance of the 65b bus service, which operates between Citywest Business Campus and Dublin City Centre via Killinenny Road to the north.

2.3.3. Neighbourhood Centre and Shops

To the north-west of the subject site is the Oldcourt Local Centre catering for local services such as a Spar, pharmacy, public house, crèche, medical clinic etc. To the north-east of the site, there is a Lidl store on Beechdale Road. To the east of the site, in the eastern section of the Plan lands, adjacent to Stocking Wood lands have been designated for local centre use as part of the Ballycullen – Oldcourt LAP. Tallaght town centre, which provides a broad range of services and facilities, is located 3-4 kilometres north-west of the subject site.

2.3.4. Children's Play Areas

The Ballycullen – Oldcourt LAP provides for children's play facilities to be provided throughout the parks and open spaces that permeate the Plan lands especially within Neighbourhood Parks and Local Pocket Parks. To the west of the application site, will be open space as identified in the LAP which will form part of a hierarchy of green spaces that will permeate the LAP lands; these open spaces will serve a variety of roles and functions and within same, i.e. Neighbourhood Parks and Local Pocket Parks, children's play facilities are to be provided in the form of Neighbourhood Equipped Area for Play (NEAP), Local Equipped Area for Play (LEAP) and Young Children's Area for Play (YCAP).

2.3.5. Leisure Facilities

There are numerous leisure facilities in the Tallaght area which include the Tallaght Leisure Centre located on Fortunestown Way. Tallaght town centre benefits from a multiplex cinema theatre and a civic theatre as well as the broad range of shopping facilities provided at The Square shopping centre. There are various other sports clubs and facilities located across the Dublin 24 area. East of the Plan lands, east of Stocking Lane are three golf courses in the form of Rathfarnham Golf Club and Edmondstown Golf Club. The Dodder Riverbank Park is to the north-west of the site off Firhouse Road West, which forms part of the County's Green Infrastructure network.

2.3.6. Community Centers

The closest community centers to the development site at Oldcourt are the Firhouse Community centre, which is north of the site at Ballycullen Drive, Firhouse and caters for a multi-purpose community centre with function rooms and a licensed bar. The centre also provides a range of activities for the local community. The Park Community Centre at Ballycragh Park, also north of the site, caters for a variety of activities such as Yoga, Dance, Keep Fit, Youth etc. The centre has rooms for rent and we understand has a coffee shop on the premises. Further north is Dominic's Community Centre at Avonbeg Gardens, Tallaght which is a multi-purpose community centre providing a range of activities for the local community, including youth club and caters for services such as childcare facilities, after schools clubs, ladies club, bingo, internet cafe, crochet, active men's club, computer classes, tea dances, classic movie nights, bible groups and adult education classes. There are an additional 10 no. community centers located in the Dublin 24 area, catering for a range of community uses.

2.3.7. Religious Facilities

There are a number of religious facilities located close to the development site which include:

- Ballycullen Community Church (Baptist) on Ballycullen Drive, Firhouse;
- Glorious Family Int. Church (Pentecostal) at 40 Oakdale Close, Firhouse;
- Our Lady of Mount Carmel (Roman catholic) on Ballycullen Avenue, Firhouse;



- St. Anne's Tallaght (Roman catholic) on Bohernabreena Road, and
- Victory Christian centre (Non-Denominational) on Firhouse Road.

2.3.8. Employment

The subject site is within 3-4 kilometers of Tallaght town centre, which is the administrative centre for South County Dublin and the location of Tallaght Hospital. Tallaght town centre is also a major retail and commercial centre. There are a number of business parks within close proximity of the subject site including the Citywest Business Campus, Baldonnell Business Park and Magna Business Park. The subject site also benefits from access to employment opportunities in Dublin City Centre given the proximity of the lands to the Tallaght Red Line Luas stop and the level of service associated with same.

3.0. Concept Plan

The concept plan for the subject site has been derived from the objectives of the Ballycullen - Oldcourt LAP, the site context and its surroundings and current housing demand. The overall objective of the LAP is to provide a development framework with residential densities appropriate to the unique location of the lands on the suburban edge of the Dublin Mountain foothills. The LAP provides for the construction of approximately 1,600 additional dwellings (about 4,600 persons) at a range of densities appropriate to the area. Given that the subject site is located on the mid and upper slope lands, and is predominantly "partially constrained lands" yet is zoned and identified for new housing, the permission being sought reflects the objectives of both the County Development Plan and LAP.

The Ballycullen - Oldcourt LAP contains an indicative framework plan for the overall lands, with the subject site being identified for mid to low density housing providing for the protection of hedgerows and biodiversity and links to green spaces and adjoining lands. The LAP requires the provision of a continuous linear green space along the elevated southern boundary of the Plan Lands which will act as a green buffer between development and the Dublin Mountains which is catered for as part of the layout put forward for permission. The proposed site layout plan has been refined by Delphi Design to reflect the practicalities of the topography of the land and the existing utilities south of the lands, whilst also providing for access, services and good design.

Given the need to protect views south to the Dublin Mountains, along with the existing topography of the site and the requirement to provide for low density development, the proposed site layout plan is put forward for permission which also accommodates connections to surrounding areas, provides for open spaces and green belts and incorporates existing landscape features and habitats of value. All streets and spaces shall be overlooked with frontage being continued around corners to ensure an appropriate level of passive surveillance of public areas.

Given both the context of the site and the requirements of the LAP, there is a mix of single storey, dormer and two storey housing on relatively large plots. The proposed low density of development provides for a scale of development that is akin to rural housing with minimum visual and topographical impacts. It is also proposed to construct three no. 2 storey buildings that accommodate 16 no. apartments in total. All of the proposed dwellings have been designed to front onto the street and public opens spaces.

4.0. Urban Design Statement

This section assesses the proposed development against the Design Criteria and Indicators contained in the Urban Design Manual – Best Practice Guide in accordance with the requirements of the South Dublin County Development Plan and the Ballycullen – Oldcourt LAP.



Context – How does the proposed development respond to its surroundings?

The context of the proposed development must be considered as being another phase of residential development in the western section of the Plan lands. To the west/north-west, permission has been granted by the Planning Authority for the development of c.235 dwellings, with Phase 1 of Dodderbrook 1 currently under construction. The lands in the western section of the Plan lands are in a number of different ownerships with the subject application site lying in between undeveloped lands that are in third party ownerships, and the site is separated from permitted and existing residential developments to both the east and west respectively.

The lands are classed as Mid Slope and Upper Slope lands by the Ballycullen – Oldcourt LAP and are identified as catering for low density residential development. Taking these requirements into consideration, along with the locational context and topography of the site, it is proposed to develop low level and low density housing on this site. In relation to the sites location on the periphery of an urban area, the proposed low density housing can be absorbed within existing and proposed landscaping. The proposed development, and its layout, is a specific design response to the locational context of the site thus creating a unique character area within the Plan lands that is an appropriate response. The form of development is consistent in the use and scale of the receiving environs whilst being designed on a network that allows the proposed development to connect and integrate with surrounding areas, as part of future development of the LAP lands. Existing landscape features including trees and hedgerows have been considered in terms of the layout of the proposed development, along with the provision of open spaces, all of which combines to protect these features in a manner which will increase their amenity value and the facilitation of the creation of a green network.

Connections – How well connected is the new neighbourhood?

The site is located at the upper reaches of the Plan lands and along the zoned development boundary. In addition, adjoining lands are in third party ownership and remain undeveloped. However, cognisance has been paid to the requirements of the LAP layout whereby the proposed development is designed on a network which will connect to existing and future development in the adjoining Plan lands. The Planning Authority has granted permission for the development of the Main Link Street under Ref. SD17A/0041, which the proposed development will directly connect into, in accordance with Objective AM5 of the LAP. The proposed street layout within the application site allows for future connectivity to adjoining lands to the west/north-west. Both within the application site itself and upon completion of development of the Plan lands, this network provides for a legible hierarchy of streets and spaces that provide a safe and attractive environment for cyclists and pedestrians as well as convenient vehicular access to individual dwellings. It should also be noted, that in accordance with the objectives of the LAP that the proposed roads/streets follow the contours of the land in order to minimise the impact on the landscape and on natural drainage, thus complying with Objective AM1 of the LAP.

Inclusivity – How easily can people use and access the development?

The proposed housing typologies have been designed to provide for the lifecycle requirements of families. Lifelong housing enables communities capable of supporting existing and proposed local services and facilities such as schools and shops to be established and sustained. There is currently a shortage of this type of housing in the Greater Dublin Area. The majority of the proposed dwellings comprise own-door access and have been designed to facilitate universal access. There are a variety of dwelling types within the proposed scheme such as apartments, traditional family type semi-detached houses, dormer bungalows and two bedroom bungalows thus catering for a wide range of people and household formations as well as various life stages. The proposed public open space comprises green corridors along the boundaries of the site and a large area of open space in the south-western corner. These areas in conjunction with the planned open space network for the Plan lands, provide for a hierarchy of formal and informal open spaces that cater for a variety of users and ages. The proposed public open space is overlooked and as such provides a safe and accessible environment for both residents and visitors.



Variety – How does the development promote a good mix of activities?

The proposed development comprises low density housing within the context of the overall Ballycullen – Oldcourt LAP area. The use of this site for residential development is compatible with the land use zoning objective attached to the site and accords with the framework set out in the LAP. To the immediate east and west are undeveloped greenfield lands that are zoned and identified for future residential development. Further east and west permissions have been granted for residential development, which have commenced. North of the Oldcourt Road, large residential developments have been delivered, including along local / neighbourhood centres. Further east on the Ballycullen lands, a neighbourhood centre is identified as part of the LAP, with housing on our client's lands supporting same in the future. The LAP identifies this site for housing with other uses such as open space, playing pitches, schools and local / neighbourhood services catered for as part of the LAP.

Efficiency – How does the development make appropriate use of resources, including land?

The density of the proposed development has been designed to reflect the requirements of the LAP and the elevated and peripheral location of this site along the southern development fringe of the county. The proposed density is in accordance with the Ballycullen - Oldcourt LAP which recognizes the context of the subject lands. Existing resources such as trees/hedgerows along the boundaries of site have been considered as part of the proposed development which enhances their amenity value through the development of green corridors, which can further link into the planned open space network envisaged in the LAP. The orientation of the proposed housing provides for morning and evening sunlight but also eliminates the requirement for retaining walls and cut and fill. As such, the potential for passive solar gain has been maximized without compromising the site layout and topography.

Distinctiveness – How do the proposals created a sense of place?

The proposed development will have a distinctive character derived primarily from its location, layout, building form and landscaped setting. The proposed low level and low density development provides for the creation of a unique character with the Plan lands and is differentiated from generic suburban housing by the nature of the individual houses, mix of house types and low building height and will therefore be a positive addition to the identity of the locality. The layout respects the topography of the site which itself helps to make the scheme distinctive and identifiable.

Layout – How does the proposal create people friendly streets and spaces?

The proposed layout caters for permeability through the site whilst being designed to incorporate subtle changes in alignment that enable traffic calming without the use of ramps. The proposed roads are overlooked by dwellings and include tree lines and generous footpaths as standard. All of the proposed open space is overlooked and incorporates existing landscape features where appropriate. These areas shall be landscaped to provide attractive amenity spaces that encourage appropriate recreational uses and which reflect the rural nature of lands further south as well as being sympathetic of views to the mountains.

Public Realm – How safe, secure and enjoyable are the public areas?

As previously noted all streets and spaces are overlooked by the proposed dwellings to ensure appropriate passive surveillance throughout the development. Lamp standards will be provided within the public realm and will ensure all public areas are lit to an appropriate level.

The proposed public open spaces have been designed to have a particular character that reflects its location and intended function, whilst also being cognizant of heritage and biodiversity items on the site. The open space on site can also cater for recreation and play areas. The layout and location of the open space also takes into consideration the open space network set out in the LAP and will allow for connections into same as the entire Plan lands are developed over time.



Adaptability – How will the buildings cope with change?

The proposed dwellings have been designed to provide for a variety of users, including long term family accommodation that caters for the changing requirements of evolving households. A variety of two, three and four bedroom units are proposed, ranging from apartments to houses. Generous ground floor living accommodation is provided with the potential to extend into the rear garden. As such, the character of the proposed dwellings can be maintained whilst providing an opportunity to extend, if required. The proposed bedroom accommodation includes a master bedroom and 2 / 3 no. secondary bedrooms, one of which is suitable for use as a home office or other similar uses. The houses have been designed to provide for easy access to attic space.

The proposed dwellings have been designed to meet building regulation standards and achieve a high-energy rating by providing for passive solar gain, high insulation values, solar water heating, energy efficient appliances and water conservation measures including eco-flush toilet systems and water butts. These are all matters for building regulations and control mechanisms.

Privacy and Amenity – How does the scheme provide a decent standard of amenity?

The proposed dwellings have been designed to comply with the private open space standards of the County Development Plan and include rear gardens which are typically orientated in an east, west or south direction. This amenity space is directly accessible and visually connected to the ground floor kitchen/dining/living area to the rear of the proposed dwellings.

All dwellings benefit from dual aspect. Opposing first floor rear windows have a minimum separation distance of 22 metres and front room windows are typically set back from the street and in the case of corner dwellings also comprise a privacy strip to eliminate any undue overlooking.

Party walls have been designed in accordance with Parts B & E (fire and sound) regulations and are designed to ensure that sound transmission between dwellings is minimized. These are matters that will be subjected to the building regulations.

Storage space has been provided within each dwelling unit to comply with the storage space standard of the DoEHLG guidelines – Quality Housing for Sustainable Communities. This storage includes built in storage within bedrooms, utility storage and kitchen storage as well as attic storage.

Parking – How will the parking be secure and attractive?

Car parking provision predominantly comprises 2 no. off-street car parking spaces per house and given the topography of the site, car parking is catered for within the curtilages of the house. For the proposed apartments, car parking is provided for in the form of an on-street parking court. Car parking provision has been designed to be overlooked by dwellings and visible from the public realm. It is proposed that bicycles are parked in the rear of dwellings which are in the majority accessible from the side passages.

Detailed Design – How well thought through is the building and landscape design?

Given the location of the lands along the southern most development fringe of the county, the pattern of development in the area and the requirements of the LAP for development on “Mid and Upper Slope Lands”, the design of the proposed dwellings is traditional in nature, is of a low level with a large proportion of the house being dormer or single storey. There are variations in the use of materials, composition of openings and façade treatment whilst maintaining an overall coherency in terms of scale and form, the overall palette of materials used and landscaping treatment. This approach will provide for architectural variety whilst maintaining an overall sense of place.

The detailed design of individual dwellings seeks to minimize the visual impact of services. As such, the storage



of bins is proposed in the rear gardens with access to the front of the dwelling provided via side passages. Flues and vents shall be located on gable and rear walls in order to minimize their visual impact.

The landscaping proposals for the development have been identified in tandem with the scheme design and as such compliment the design of the proposed dwellings. The proposed dwellings employ durable high quality materials such as brick and render which can be easily maintained by property owners as required. Equally, the public open spaces have also been designed to minimize maintenance requirements whilst providing for attractive and functional amenity areas. Public open space shall be grassed and planted with selected tree species appropriate to their location.

5.0. Conclusion

The design of the proposed development has emerged from extensive site investigations and consultations with respect to local and site specific opportunities and constraints and previous experience of residential design. Significant measures have been taken to ensure that the proposed development integrates with existing and future development including the provision for linkages to the adjoining LAP lands. Landscape features of value will be integrated into the scheme. The proposed development has been designed to take into consideration both the topography and locational context of the site thus providing for a development of low level and low density housing, which also respects the site being situated at the interface of the rural area with the built up urban area. All of these factors, along with the requirements of the LAP are reflected in the development put forward for permission which provides for a layout of housing that caters for connectivity, inclusivity, variety, efficiency and distinctiveness within the public realm in accordance with the design criteria and indicators identified in the Guidelines for Planning Authorities for Sustainable Residential Development in Urban Areas. Furthermore, the proposed dwellings have been designed to be adaptable, provide for a high standard of privacy and amenity, and provide for safe, convenient and attractive car parking as well as being of a high architectural standard. Accordingly, the proposed development reflects the principles of good urban design and is consistent with the County Development Plan policies regarding the development of sustainable neighbourhoods.



Appendix B - Schedule of Accommodation



Unit Type	Description	Gross Floor Area (sq.m)	Living Room (sq.m)	Kitchen / Dining Area (sq.m)	Agg. Living Area (sq.m)	Bedroom 1 (sq.m)	Bedroom 2 (sq.m)	Bedroom 3 (sq.m)	Bedroom 4 (sq.m)	Agg. Bedroom Area (sq.m)	Storage (sq.m)
A	3 bed semi-detached 2 storey house	111	16.92	23.96	40.88	13.68	13.5	7.39	N/A	34.57	5.01
A1	3 bed semi-detached 2 storey house	113	19.15	23.96	43.11	13.68	13.5	7.39	N/A	34.57	5.01
B	2 bed semi-detached 2 storey dormer house	97	15.75	22.4	38.15	15.5	11.5	N/A	N/A	27	6.7
C	3 bed bungalow	96	30.5	N/A	30.5	13.26	11.4	11.6	N/A	36.26	5.58
C1	2 bed bungalow	83	30.5	N/A	30.5	14.28	11.6	N/A	N/A	25.88	5.58
C2	2 bed bungalow	83	30.5	N/A	30.5	14.28	11.6	N/A	N/A	25.88	5.58
C3	3 bed bungalow	96	30.5	N/A	30.5	13.26	11.4	11.6	N/A	36.26	5.58
D	3 bed detached house	111	16.92	23.96	40.88	13.68	13.5	7.39	N/A	34.57	5.01
E	4 bed detached house	161	19.75	29.64	49.39	22.12	15.75	14.66	13.8	66.33	10.36

