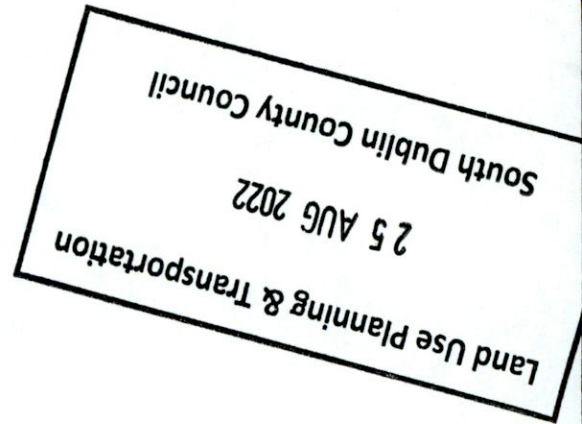


**Further Information Response for
Reg. Ref. SD22A/0039**

**Development at Silveracre Bungalow,
Whitechurch Road,
Rathfarnham, Dublin 14, D14 W2K8**

On behalf of
Dungrey Limited

August 2022



**Brock
McClure**

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1 Introduction

Brock McClure, Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, are instructed by our client, Dungrey Limited to submit this Further Information Response for the proposed development at No. 6 Whitechurch Road, 5 no. derelict bungalows at Whitechurch Road and Silveracre Bungalow, Whitechurch Road, Rathfarnham, Dublin 14, D14 W2K8 (SDCC Reg. Ref. SD22A/0039).

This response comprises:

1. Further Information Planning Report by Brock McClure Consultants
2. Revised Drawings prepared by BBA Architects (see attached issue sheet)
3. FI Response from Arbeco Arborists
4. Revised Landscape Details from Parkhood Landscape Architects
5. Invasive Species Report by Enviroguide Environmental Consultants
6. Revised Lighting Layout by Task LED
7. FI Response by Slattery Conservation Architects
8. Revised engineering details and response by POGA Consulting Engineers
9. FI Response on transport by Transport Insights Consulting Engineers
10. Revised Photomontages and CGI by 3DDB and Parkhood

6 no. copies of the above material are submitted for the consideration of the Planning Authority.

Considerable effort has been invested in revising and revisiting some details of the design strategy

In addition, we note that some information had already been provided in the initial application pack however, we are happy to submit this again, to bring further clarity to the process and to allow the Local Authority to make a positive decision.

This response has been prepared by Brock McClure Planning and Development Consultants with detailed inputs from the full design team including BBA Architects, POGA Consulting Engineers, David Slattery Conservation Architects, Enviroguide environmental Consultants, 3DDB, Parkhood Landscape Architects, Arbeco Arboricultural Consultants, TASK LED lighting experts and Transport Insights.

We confirm that all matters have been positively responded to and we trust a grant of permission will be forthcoming.

Our client is keen to commence work on this under utilised site at the earliest opportunity, to deliver much needed housing at this strategic location.

We look forward to a positive response from Council in response to the submission of this further information.

2 Overall FI Response Rationale

As stated above, our client has made very effort to design a scheme, that at all times, reacts positively to the comments of the Council – the response to the Further Information is no different.

Pre-Planning Meeting

Given that different planning personnel dealt with the pre-planning request than the application, we felt it appropriate at this point, to reiterate our experience at pre-planning in an effort to demonstrate to the Council our clients willingness to respond proactively to comments made at that time.

On the 4th June 2021 a Pre-Planning meeting was held with the Applicant Dummoj Properties Limited and South Dublin County Council.

Two options were put forward at that pre-planning meeting, with the 22 unit townhouse development being identified as the preferred option for the Planning Authority at this location. The applicant has maintained the same design principles as accepted at pre-planning stage for the purposes of this planning application. This application addresses the issues the planning authority raised with the density and design proposed at that time, and have continued with a proposed scheme of housing units across the entire site. The preferred option as discussed at pre-planning stage is shown below.

Option 1

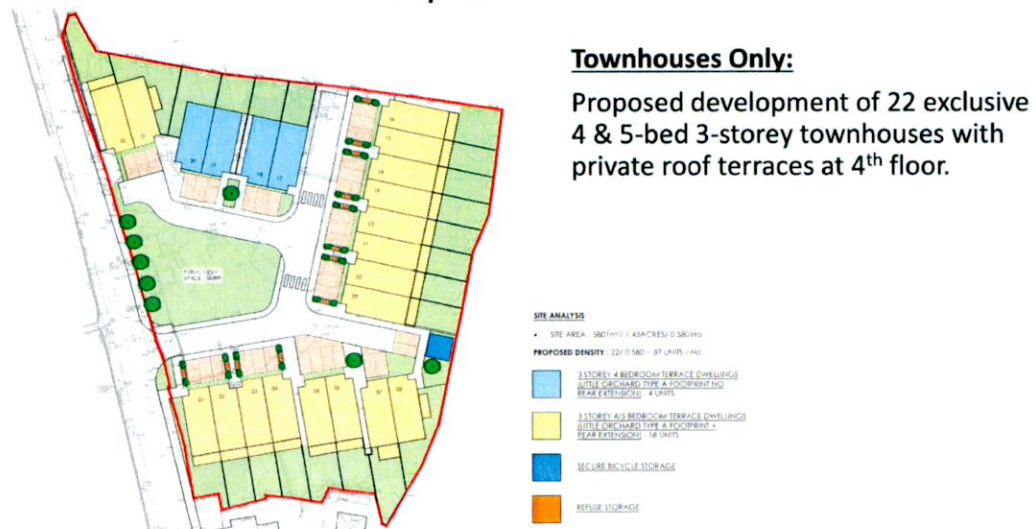


Figure 1 – Preferred scheme displayed at pre planning meeting between South Dublin County Council and Dummoj

On foot of the direction given by the Council a decision was made to remove an apartment block and focus on a housing typology only. The result was the high quality design solution that was lodged to the Local Authority and we are pleased with a request for Further Information that allows us work with the Council through the application process.

Further Information Request and Principle of the Scheme

In the first instance we welcome the general acceptance by the Planning Authority, as iterated in the CEO's report, on the density and overall layout of the scheme and we can now confirm that we are also able to respond positively to the Further Information request.

Under the direction of Dungrey Ltd, BBA architects have refined the design of the scheme including active side elevations providing for increased passive surveillance, a review of the overall height of the scheme addressing how it presents onto Whitechurch Road, the overall palette of finishes across the scheme along with parking, private open space, and landscape updates.

The subject proposal has had a particular regard for both internal and external residential amenity and any overlooking through the provision of appropriate setbacks, turning areas within the layout of the scheme has all been addressed along with the ambition and intent to deliver quality and meaningful open space for residents.

3 Further Information Response

3.1 South Dublin County Council Development Plan

Before responding in detail to the queries raised by the Council, we can confirm the revisions made to the proposed development are in full accordance with the policies and objectives of the recently adopted South Dublin County Council Development Plan.

3.2 Further Information Request Item 1:

1. *The Planning Authority has concerns in regard to the overall height, form and design of the proposed development and the associated impact on existing residential and visual amenities in the area. In this regard, the applicant is requested to address the following requirements of the Planning Authority.*

(a) A reduction in the height of the proposed dwellings to a maximum of 3 storeys;

(b) Reconfiguration of Unit No. 1 and No. 22 to provide a frontage/ entrance onto Whitechurch Road. The proposed boundary treatment along this boundary should be revised to provide a privacy strip behind a low wall, hedge, or railings until where it meets the rear private amenity space behind the dwellings along this boundary.

(c) Reconsideration of the proposed materials and finishes, having regard predominant building palette in the area especially the neighbouring Protected Structure and the adjoining ACA. A greater variance in materials across elevations (particularly the rear elevations) and house types should also be considered. A full set of revised drawings should be submitted.

This includes a revised proposed site layout that includes proposed site levels.

3.2.1 Applicant Response to Item 1 (a):

(a) A reduction in the height of the proposed dwellings to a maximum of 3 storeys;

In response to the concerns raised by the planning authority has with the overall height, form and design of the proposed development the design team have made a significant effort to mitigate the impact the proposal would have on residential and visual amenities in the area. The units are 3 storeys with a terrace at roof level with a more traditional roof design. The figures below illustrate the modifications that have been made to the end of the terraces adjacent to Whitechurch Road which sees the overall development address the road in a much more positive manner, reflective of the character of the road and the ACA.

A simple more contemporary design, which reads smaller in both form and scale is now proposed. There is also a greater variation in house types across the scheme



Figure 2 - Treatment to Whitechurch Road as originally purposed and the amendments made that reduce the scale of the two units along the road.

We also refer the Planning Authority to the response from BBA architecture that addresses the issues raised in item 1 in detail.

The properties were designed to be 3 storey properties with an additional level simply bringing residents up to the roof terrace. This is a common design style used successfully across medium density development sites. However, having taken onboard the comments from the Council the design team have entirely redesigned the roof level of the properties. This has the benefit of reducing the visual impact and reducing the overall mass at roof level. The result presents a traditional pitched roof with the roof clad in black tile/slate materials, assimilating into the overall development successfully.

UNIT TYPE A2 + B - PROPOSED ELEVATIONS
SEMI DETACHED UNITS 21 - 22

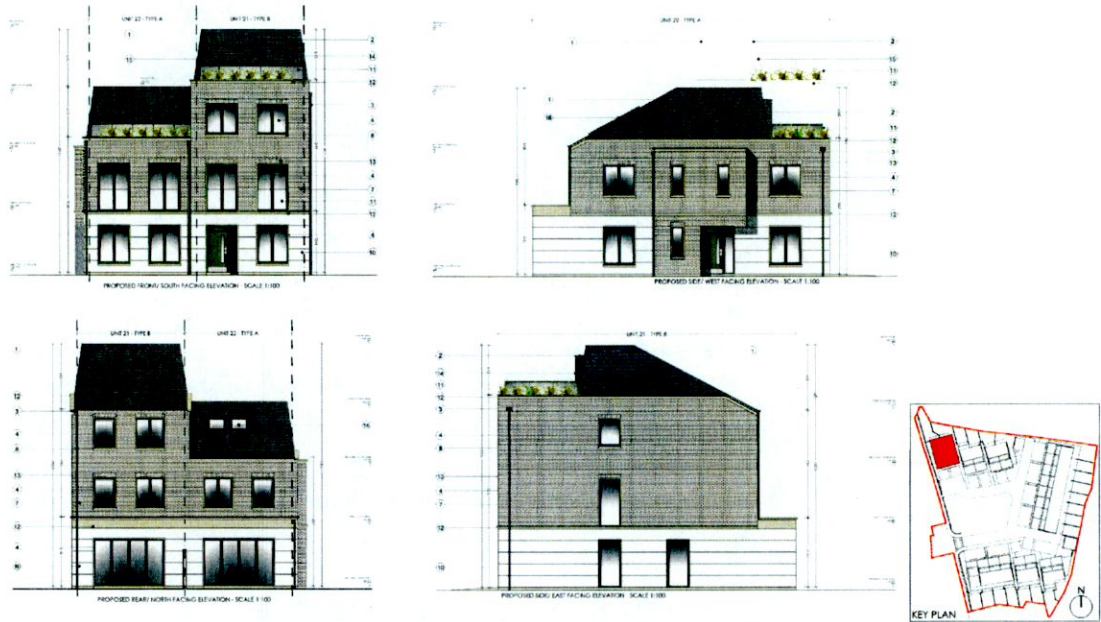


Figure 3 - Drawing no. D-0122-RFI-HTA-B-300 - Revised Design

This design change has been achieved by setting back the previously vertical roof line from the gable face of the buildings and applying a 9-degree angle to the roof walls. The same angle was also applied to the area of the roof which faces the front of the houses.

The glazed patio doors/ windows which provided access to the private amenity space at this level have been removed, the one access door that remains will be cladded in the same material as the proposed roof finish in such a way that it blends with the overall roof surface.

The proposed dwellings are 3 storey houses. Each unit benefits from access via the roof space to a private amenity space area, which provides a high quality natural light exposure and adequate supervision of parking, footpaths and the centralized public open space areas within the development. The overall Roof height of the tallest homes under this application is 12.26m which is in keeping with other similarly designed units in Dublin and Greystones.

3.2.2 Applicant Response to Item 1 (b):

(b) Reconfiguration of Unit No. 1 and No. 22 to provide a frontage/ entrance onto Whitechurch Road. The proposed boundary treatment along this boundary should be revised to provide a privacy strip behind a low wall, hedge, or railings until where it meets the rear private amenity space behind the dwellings along this boundary.

Units 1 and 22 have been redesigned to address the Local Authority's concerns in the following manner:

- The front entrance to both dwellings has been moved to the western facing elevations facing Whitechurch Road, providing these units with appropriate dual frontage and improving the framing and interface between Whitechurch Road and the proposed development. Please refer to the elevations in the figures below and BBA drawing Nos. D-0122-RFI-HTA-A1-A2-201, D-0122-RFI-HTA-A1-A2-300, D-0122-RFI-HTA-200, D-0122-RFI-HTA-300 and D-122-PL-SS-500 for further details.

UNIT TYPE A + A1 + A2 - PROPOSED ELEVATIONS + SECTIONS - TERRACE - UNITS 1 TO 4



Figure 4 – Proposed Elevations Terrace units 1 to 4. Showing west facing elevation of unit 1. Taken from Drawing no. D-0122-RFI-HTA-A1-A2-300 prepared by BBA architecture.

UNIT TYPE A2 + B - PROPOSED ELEVATIONS SEMI DETACHED UNITS 21 - 22

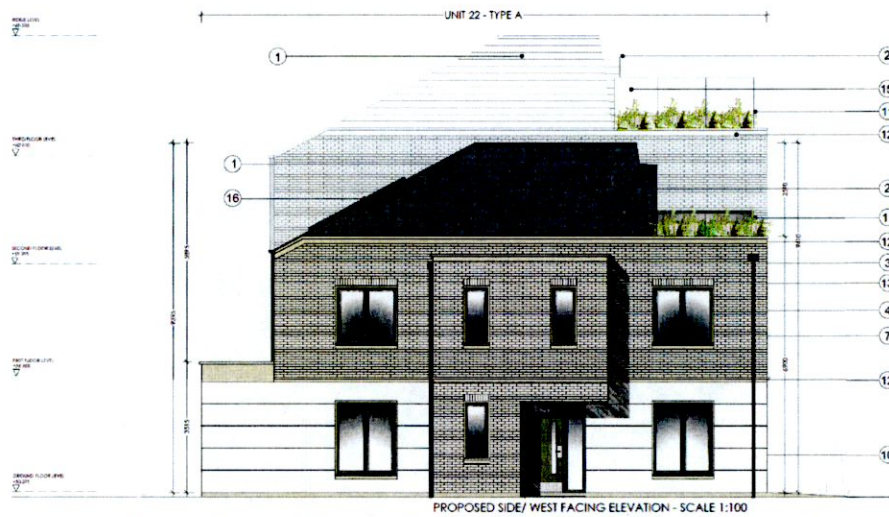


Figure 5 - Proposed Elevations Terrace units 21 to 22. Showing west facing elevation of unit 22 taken from Drawing no. D-0122-RFI-HTA-B-300 prepared by BBA architecture.

- A low-level boundary wall clad in stone, with railings above is provided along the front of units 1 and 22 up to the rear private amenity space behind the dwellings, this way providing a privacy strip between the public footpath and proposed dwellings. Please refer to BBA drawing Nos. D-122-PL-SS-500 and D-122-RFI-SL-104 for further details.

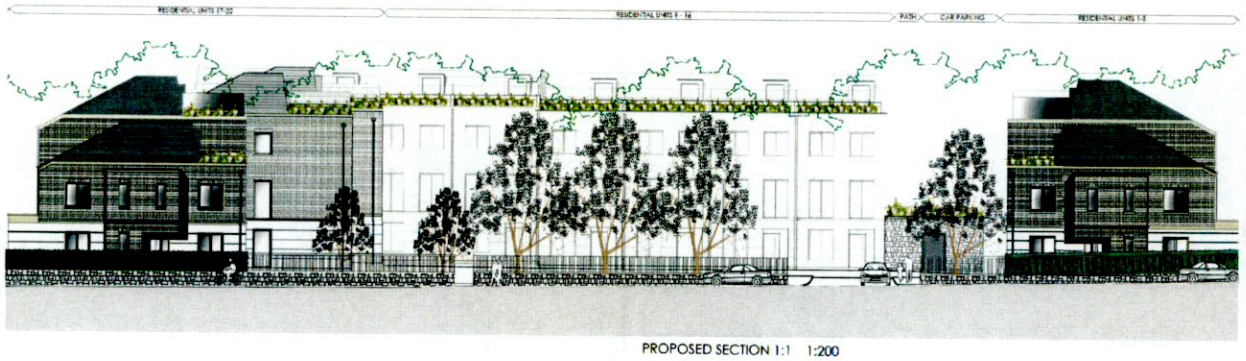


Figure 6 – Section 1:1 from Drawing no. D-122-PL-SS-500 prepared by BBA Architecture showing the low level boundary wall along the front of units 1 and 22.

3.2.3 Applicants Response to Item 1 (c):

(c) Reconsideration of the proposed materials and finishes, having regard predominant building palette in the area especially the neighbouring Protected Structure and the adjoining ACA. A greater variance in materials across elevations (particularly the rear elevations) and house types should also be considered. A full set of revised drawings should be submitted.

In addition to the details provided by BBA Architects we also refer to David Slattery Conservation Architects Historic Buildings Consultants which address the issues raised in the above items namely the Height of the proposed dwellings, the Frontage of Unit 1 and 22 to Whitechurch Road and the proposed external finishes.

All proposed external finishes have been reconsidered and revised under the advice and supervision of David Slattery Conservation Architects. Brick and render colours have been changed, together with roof design and respective materials, to provide a palette of materials more in context with the neighbouring Protected Structure and the adjoining ACA.

The same materials are used throughout the proposed development, however, applied in different areas in different house types, to provide a balance between greater variance and overall unified design.

Slattery Conservation confirm that the subject proposal are 3 storey houses that utilise the roof/attic space in an innovative response to providing a qualitative private open space. The height of the proposed dwellings is shown as a marginal increase over the Mill House and No. 50 St. Patrick's Cottages. The Mill House however is a large voluminous structure by comparison to the proposed houses and will continue to be a dominant structure on Whitechurch Road even though the principal elevation does not face the road.

Given higher density requirements and more urban inspired house types, single storey and two storey semi-detached houses are therefore no longer an appropriate or sustainable house type.

There are numerous examples of successful integration of three-storey unit types into the urban landscape of Dublin as illustrated in the following images. We note that a similar brick choice to the development at 37 Highfield road as identified in the figure below.



Figure 7 - Semi Detached Georgian inspired 3 storey semi detached houses – Highfield Road, Rathgar



Figure 8 - Torquay/Westminster Road, Foxrock

The above examples illustrate successful incorporation of the three storey house type into the urban environment and we trust the Planning Authority will look favourably on the scheme now proposed in this context. We refer the Planning Authority to the attached response from BBA Architects that includes additional examples of 3-storey dwellings of a similar height and form as the subject proposal.

In terms of the revised Frontage treatment facing Whitechurch Road, the proposed scheme has been revised to provide a revised façade treatment that addresses the road as illustrated below.



Figure 9 - Revised Elevation Treatment to Whitechurch Road

In addition, the two units facing the road have been reduced in height by one floor to address the concerns of the council and mitigate the visual impact associated with the massing and transition in scale of the proposal within the site. We trust all of the above information is adequate and will satisfy the Local authority in relation to item 1.

3-3 Further information Request Item 2

House No. 8's private garden space wraps around the rear and side, and to the front, of the dwelling. The CDP states that private open space should be located behind the front building line of the house and be designed to provide for adequate private amenity. It would also be preferable that this space was more combined for usability. The applicant is requested to submit a revised layout for House No. 8 so that a more combined area of private amenity space is provided behind the front building line of the dwelling.

3-3.1 Applicant Response to Item 2:

Both unit 8 and its associated private open space in the garden have been redesigned and adjusted to improve adequate private amenity space to the rear of the dwelling. The overall depth/footprint of the dwelling has been reduced by approximately 1.4m and compensated by redesigning the eastern element of the dwelling. This allows for an extra 1.4m depth and approximately 8m² of private amenity space in this area to give a total of 52sqm at ground floor level, in addition to the roof terrace. The location of the rear garden fences separating units 7 and 8 have also been adjusted to create a higher quality, more usable private amenity space.

We note Table 11.20 of the South Dublin County Development Plan requires a minimum of 70sqm for private open space for 4-bed units. Unit no. 8 provides 72sqm of private open space and is therefore in line with Development Plan standards.

Please refer to BBA drawing no. D-122-RFI-SL-104 for further details. We trust this design revision is sufficient to address the requirements of Further Information item 2.

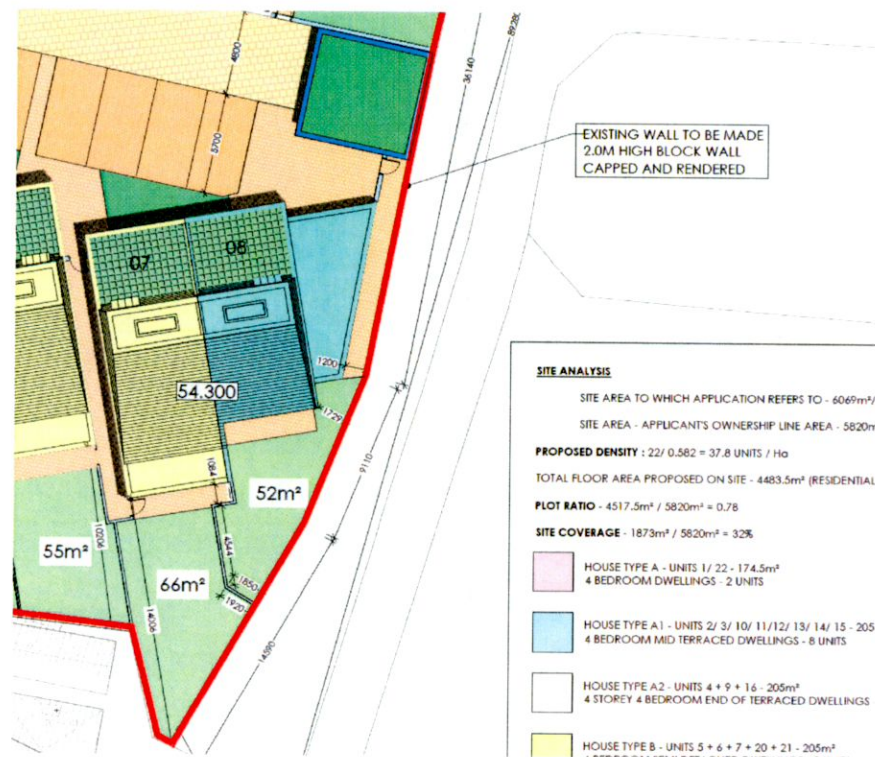


Figure 10 – Section of Site Layout showing unit no. 8 and its private open space taken from BBA drawing no. D-122-RFI-SL-104.

3.4 Further information Request Item 3

The Planning Authority is concerned that as a result of the proposed development the strip of land to the east with surface water infrastructure would be further isolated and access to it restricted (when required for maintenance). The applicant is requested to consider this strip of land (and the piped stream) in the overall development. It is requested that the nature of this infrastructure, whether it is only a piped stream, is confirmed. The site boundary (red line) should be extended to include this strip of land. The applicant should consider whether appropriate landscaping could be provided along this strip of land (in line with ecological surveys). Dedicated access to this strip of land from the subject site should be provided. An appropriate setback distance of structures from any pipe should be provided. The separation distance of the proposed bicycle store and House No. 8 in particular from the eastern boundary should be reviewed in relation to this.

3.4.1 Applicant Response to Item 3:

This area of land known as the "Tara Hill" strip located to the east of the subject site is not within the ownership of the applicant.

Despite extensive research the landowner of this land has not been identified. To include this area of land within the red line boundary for the subject site, or to include any associated development proposals with the subject site would therefore be inappropriate at this stage and could not be done without the express consent of the owner.

As part of the applicant's pre-acquisition due diligence, investigation into the ownership of the land strip to the eastern border of Silveracre Bungalow was undertaken. This involved discussions with the Vendor, online research and multiple trips to the Valuations offices and ending with a search by the Registry of Deeds.

The land continues to be unregistered and no owner has been established. We refer the Planning Authority to the attached Memo from the developer Dunmoy Properties Limited for further detail in relation to the extensive searches that were undertaken to determine the ownership of the land.

In relation to the piped infrastructure through the strip of land, the position of the pipe was ascertained on site and a new position for a portion of the pipe was agreed with Mr. Colm Harte, South Dublin County Council Area Inspector. The position of the pipe ensures adequate setbacks with any proposed buildings within the scheme. We refer the Planning Authority to POGA Drawing PL-102-P2, which is illustrated below in extract and which provides details of the route of the pipe along this strip of land and setback distances achieved.

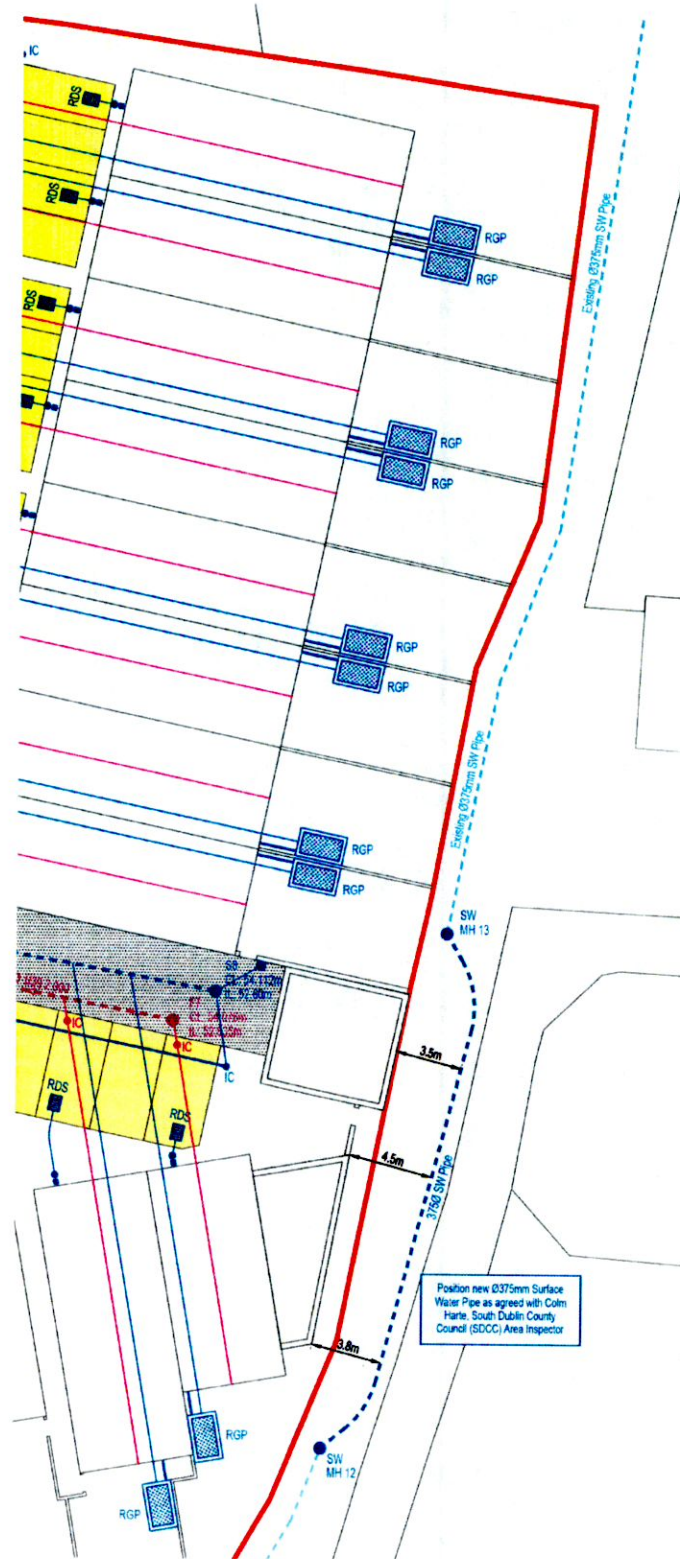


Figure 11 – Location of the Surface Water Pipe within strip of land
Drawing No. PL-102-P2 prepared by POGA

In relation to access to the strip of land, this is in no way impacted by the subject proposal. There is an existing wall along the eastern boundary of the site (western boundary of the strip of land) that was granted permission under Ref. SD12B/0315 and is not altered as a result of the subject proposal. This is an existing 2 metre wall with concrete foundation. On the other, eastern side of the strip of land an existing palisade fence restricts access and has been in place for a number of years. Access to the strip of land is through this palisade fence as shown below.



Figure 12 - Location of existin concrete wall and paliside fence prepared by Brock McClure



Figure 13 - Location of existing palisade fence on the eastern border of Tara Hill strip of land

POGA consulting engineers have responded further to this Item as follows:

We have investigated the drainage in the existing strip of land to the East of the subject site and found that there is a $\varnothing 375\text{mm}$ surface water pipe which flows northwards along the boundary of the Loreto Hockey Club and into the Beaufort Downs housing estate. We have liaised with Padraig Slyne and Gabrielle McGee (SDCC Drainage Department) and Colm Harte (SDCC Area Inspector) about this matter. We have met Colm Harte on site to show a SDCC representative the original position of the pipe and to document the agreed move.

It was agreed to locally move the existing pipe eastwards away from the boundary to achieve the required minimum 3m offset from House 8 and the bike shed building. Please refer to drainage drawing 21029-102 which shows the updated position of the surface water pipe.

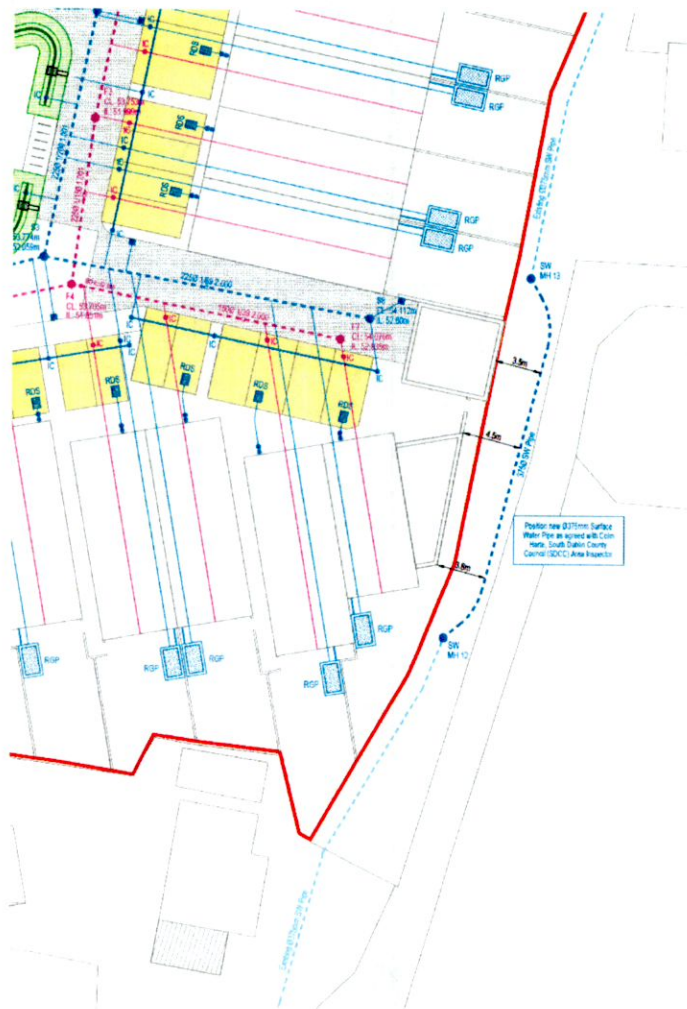


Figure 14 - POGA Drawing illustrating Location of Piped Infrastructure within Strip of Land

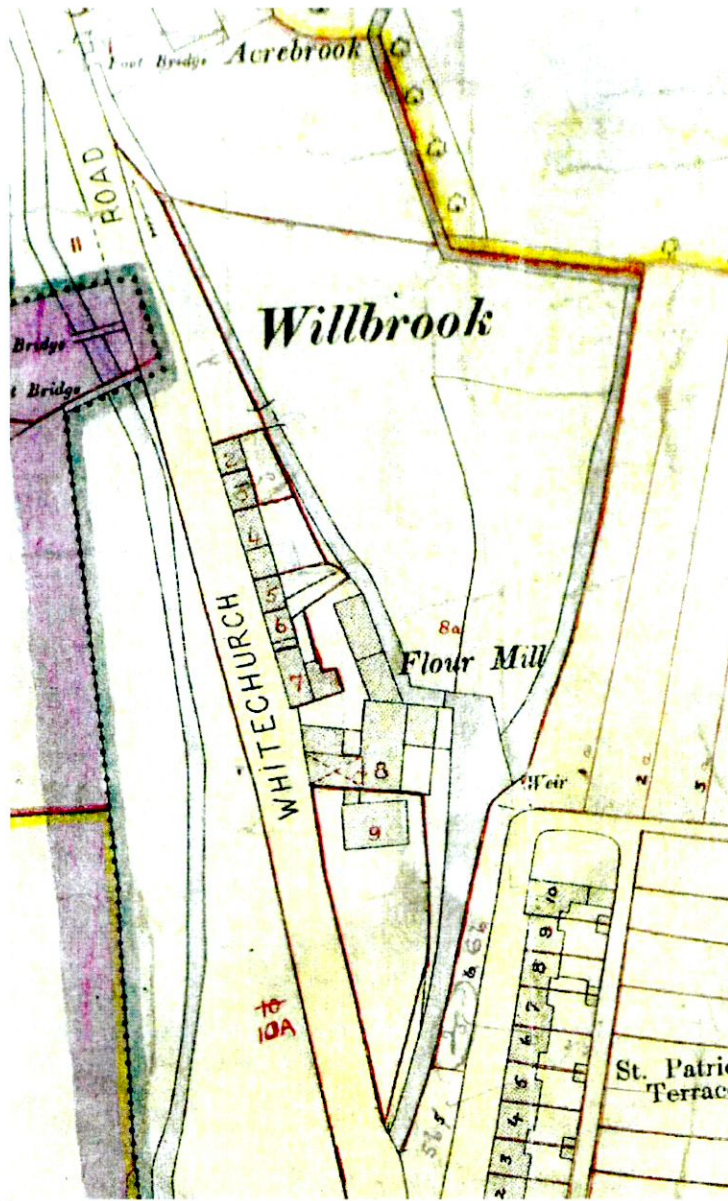


Figure 15 – Map dated 1932 Rateable lands 8 & 8a in Townland of Rathfarnham

3.5 Further information Request Item 4

The applicant is requested to submit the following in relation to public realm and landscaping:

- (a) A fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section including:
- i. A comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
 - ii. 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. Street Frontage to the Whitechurch Road should include street trees planting.
 - iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.
 - iv. Revised proposals shall include the provision of additional natural SUDs features to reduce or remove the need for an attenuation tank within the development.
- (b) A comprehensive Tree Report. This shall comprise of a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:
- i. **Tree Survey Plan:** all trees and hedges on and adjacent to the subject site (i.e., vegetation contained along the banks of the culverted stream) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
 - ii. **Tree Survey Schedule:** a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition, and useful life expectancy.
 - iii. **Arboricultural Impact Assessment:** a thorough, detailed, and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
 - iv. **Design Iteration - Adjustments, Revisions to Proposed Site Layout:** subsequent to and arising from the Impacts Assessment, the applicant's design team shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retention.
 - v. **Tree Constraints Plan:** a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
 - vi. **Tree Protection Plan:** a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities; plant, equipment and materials storage etc. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.
 - vii. **Arboricultural Method Statement:** clear and practically achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

- viii. **Summary Table:** Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
- ix. The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.
- x. Arborist's name, Arboricultural qualifications, and contact details.
- xi. Date that the survey was carried out (surveys > 12 months are unacceptable).

(c) The current landscape proposal for the development contains a lack of street tree planting and is not acceptable to the Public Realm Section. The applicant is requested to submit a revised landscape plan to incorporate additional street trees. Street trees within the development shall be provided fully in Public Areas and not between private or management company driveways. Street Tree Planting shall be located within the Public Realm and include SUDS features. Response should include revised layout and drawings.

(d) A detailed play strategy for the subject site to be submitted, additional details to be provided include:

- A specification of all play equipment to be installed including provision for children with disabilities and special sensory needs;
- A specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas.

(e) An Alien Invasive Plant Species Survey Report for the subject site.

3.5.1 Applicant Response to Item 4:

We refer the Planning Authority to the response prepared by Parkhood Chartered Landscape Architects for all issues listed under item 4 that relate to Landscape and Public Realm. This response is inserted below for the convenience of the planning authority with the additional information requests on the left hand column and the responses on the right hand column.

Item	FI Request	Response
4 (a)	<p>A fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section including:</p> <ul style="list-style-type: none"> • i. A comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development. • ii. 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 	<p>Please see Drawing No. 7260 L101 Landscape Proposals, Drawing No. 7260 L012 Play Area Specification and the accompanying Landscape Design Statement.</p> <p>As noted on Drawing No. 7260 L101 Landscape Proposals, species selection is based in part on those identified in the All Ireland Pollinator Plan 2015-2020.</p> <p>With reference to the street frontage to Whitechurch Road, trees have been proposed to the central open space area to the core of the site including 3 no. Prunus avium towards the footpath edge. Hedgerows are also proposed to the side / gable ends of the proposed properties to the north and south of this open space to enhance its green characteristics.</p>

	<p><i>and support pollinators within the landscape. Street Frontage to the Whitechurch Road should include street trees planting.</i></p> <ul style="list-style-type: none"> • <i>iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.</i> • <i>iv. Revised proposals shall include the provision of additional natural SUDS features to reduce or remove the need for an attenuation tank within the development.</i> 	<p>With reference to SuDs, POGA Consulting Engineers have been in consultation with SDCC Water Services and agreed on drainage principles and have added additional SuDs measures including permeable paving to driveways, raingarden areas and detention basins and these have been incorporated into Drawing No. 7260 L101 Landscape Proposals.</p> <p>The future management of landscape areas is set out within the accompanying Landscape Management and Maintenance Plan.</p>
<p>4 (b)</p>	<p><i>A comprehensive Tree Report. This shall comprise of a detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction - recommendations.</i></p>	<p>A Tree Survey including an Arboricultural Assessment, Impact Statement & Method Statement was undertaken by Arbeco Ltd (Graeme Cahill BSc. Rural Environmental Mangt. MArborA) in July 2022 and forms part of this FI Submission.</p> <p>The Survey noted “no trees of any significance on the site” and that “... existing vegetation is of low quality, value, and size and has no arboricultural, landscape or cultural value. Its removal will have little or no impact on the local area.”</p>
<p>4 (c)</p>	<p><i>The current landscape proposal for the development contains a lack of street tree planting and is not acceptable to the Public Realm Section. The applicant is requested to submit a revised landscape plan to incorporate additional street trees. Street trees within the development shall be provided fully in Public Areas and not between private or management company driveways. Street Tree Planting shall be located within the Public Realm and include SUDS features. Response should include revised layout and drawings.</i></p>	<p>Additional trees have been added to the core central open space areas with 12 no. heavy standard and extra heavy standard trees now proposed. Tree planting within close proximity to any driveway accesses have been removed. See Drawing No. 7260 L101 Landscape Proposals.</p>

<p>4 (d)</p>	<p>A detailed play strategy for the subject site to be submitted, additional details to be provided include:-</p> <ul style="list-style-type: none"> • i. A specification of all play equipment to be installed including provision for children with disabilities and special sensory needs; • ii. A specification of the surface treatment within the play areas; and arrangements for ensuring the safety and security of children using the play areas. 	<p>Play facilities within a specified area have been added to the proposals as set out in Drawing No. 7260 L101 Landscape Proposals.</p> <p>Additional information in terms of specification and equipment are set out on Drawing No. 7260 L012 Play Area Specification</p>
<p>4 (e)</p>	<p>An Alien Invasive Plant Species Survey Report for the subject site.</p>	<p>An Invasive Species Assessment Report has been prepared by Enviroguide Consulting in July 2022 and forms part of the FI submission.</p>

The proposed layout of the play area and associated play equipment is shown below for illustrative purposes.

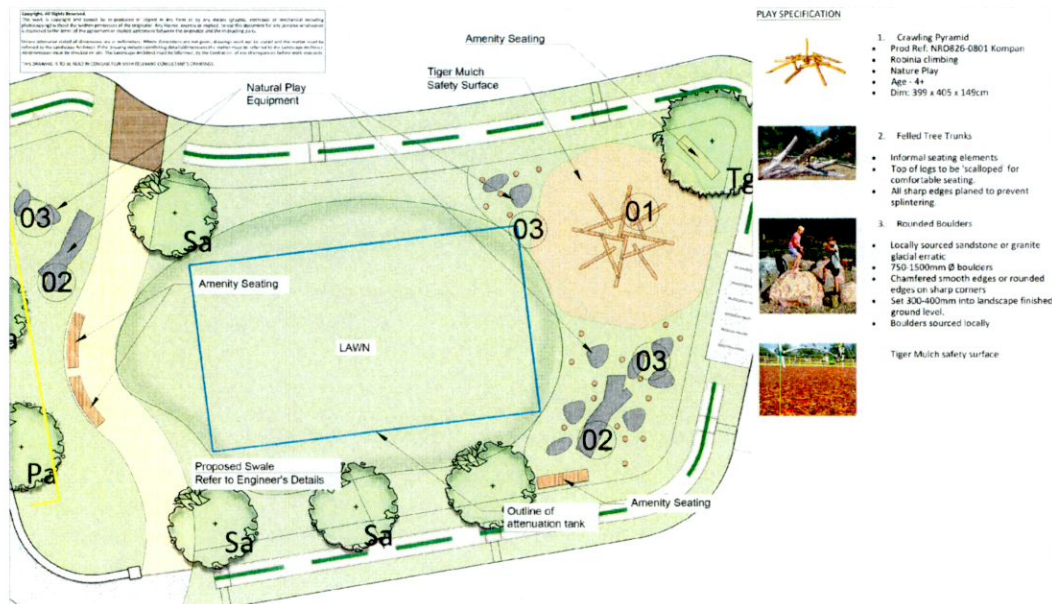


Figure 16 - Play area specification and equipment from Drawing No. 7260 L012 prepared by Park Hood Chartered Landscape Architects

3.6 Further information Request Item 5

(a) The issue of surface water attenuation has been raised as a significant concern for the Public Realm Section. A revised proposal is requested that includes further provision of additional natural above ground SuDS features to reduce or remove the need for an attenuation tank within the development. Further consideration of the breakdown in provision of open space, the location and size of attenuation tank proposed, and the incorporation of additional SuDS measures needs to be carried out. The response should include revised layout and drawings and avoid the use of underground tanks within open space areas where possible. The applicant is referred to the recently published SDCC SuDS Design Guide for further information and guidance. Examples of above ground SuDS to consider include:

- Green roofs
- Swales Tree pits
- Permeable Paving
- Rain gardens
- Channel rills
- Water butts
- Grasscrete

(b) The applicant is requested to submit a drawing and report to show what SuDS are proposed for the development. Show in m³ what surface water attenuation capacity proposed SuDS systems have.

(c) A comprehensive SuDS Management Plan is requested 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. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

3.6.1 Applicant Response to Item 5 (a):

We refer the planning authority to POGA Consulting Engineers report which responds to the issues raised in item 5(a) in full. This response is also summarised below.

POGA Consulting Engineers have consulted with Brian Harkin, Senior Executive Engineer at South Dublin County Council and agreed a surface water drainage philosophy. Additional SuDS features have been incorporated into the design of the scheme including;

- permeable paving at the driveways with infiltration trenches at the base,
- a raingarden planter at the rear of each dwelling to store and treat the run off from 50% of the roofs,
- swales and infiltration trenches to drain sections of the road, and
- a 200mm deep over ground detention basin to store the attenuated storm water flows generated by the 1 in 100 year storm event.

In addition the design team have reduced the size of the underground attenuation storage system. However it is not possible to remove the attenuation storage under public open space completely due to the 1 in 100 year storm event.

Please refer to drawings provided by POGA Consulting Engineers drawing no. 21029-102 for the drainage layout and drawing no. 21029-105 for surface water/SuDS features details.

3.6.2 Applicant Response to Item 5 (b):

We refer the planning authority to Appendix A of POGA Consulting Engineers report which responds to item 5(b) in relation to the SuDs that are proposed. Appendix A shows a full break down of the SuDs treatment philosophy with the attenuation capacity provided for each system. Drawing no. 21029-102 and 105 display the attenuation storage capacity provided.

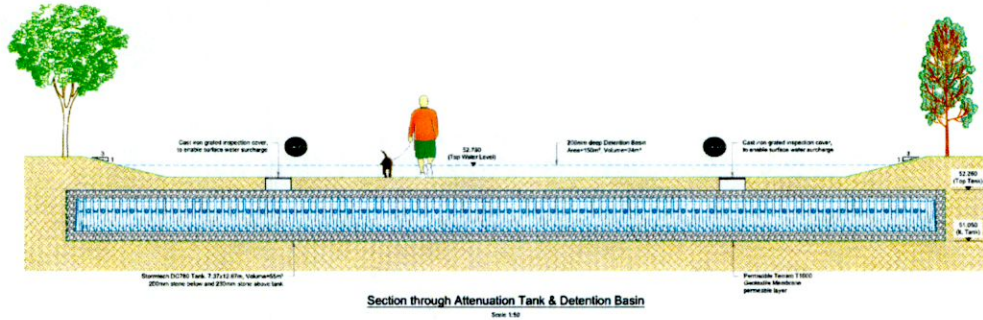


Figure 17 - Figure taken from Drawings no. 21029-105 illustrating section through attenuation Tank and Detention Basin prepared by POGA Consulting Engineers.

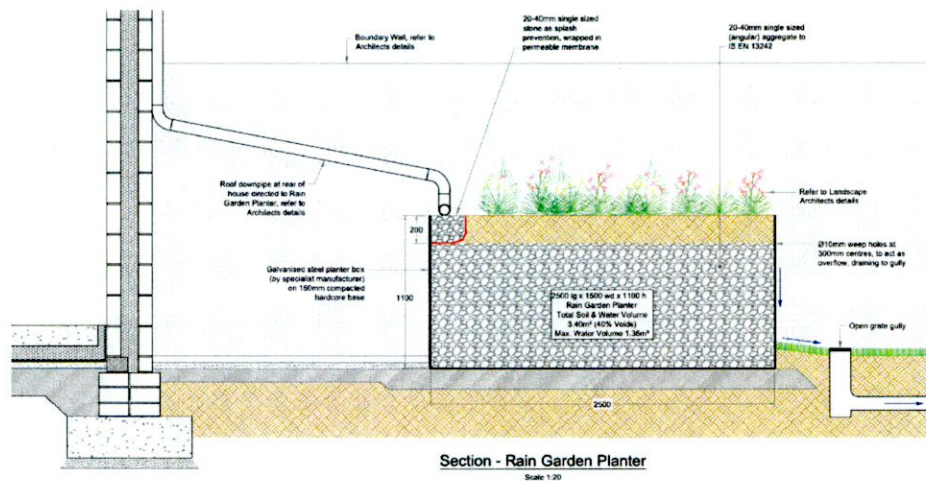


Figure 18 - Figure taken from Drawings no. 21029-105 illustrating section through the Rain Garden Planter prepared by POGA Consulting Engineers.

3.6.3 Applicant Response to Item 5 (c):

We refer the planning authority to Appendix D of POGA Consulting Engineers report which includes the SuDs Management Plan as requested by South Dublin County Council.

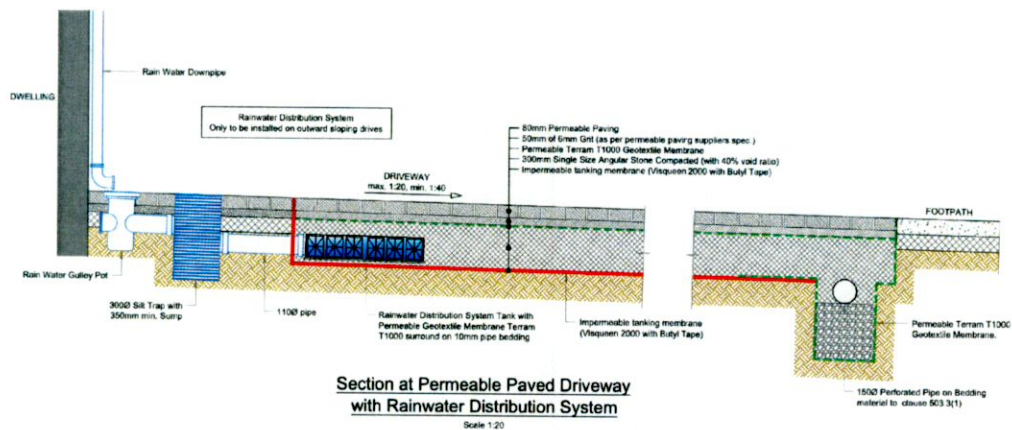


Figure 19 - Figure taken from Drawings no. 21029-105 illustrating section through the Permeable Paved Driveway with Rainwater Distribution System prepared by POGA Consulting Engineers.

3.7 Further information Request Item 6:

The applicant is requested to submit a report and drawing to clearly show the location of proposed site on an OPW CFRAM Flood map. This will identify the location of site relative to adjacent flood zones if any and determine if any flood risks arise. If there is a risk of flooding such as a 1 in 1,000 year flood risk outline in a report and drawing what flood mitigation measure are proposed for the development. Outline in report what if any flood risk there is for property upstream and downstream of proposed development due to same. Prior to the submission of revised documents, the applicant might contact water services of South Dublin County Council to discuss same.

3.7.1 Applicant Response to Item 6:

We refer the planning authority to Appendix C and to the figure below of POGA Consulting Engineers report which shows the site boundary in red imposed on the RPS flood map.

RPS Consulting Engineers produced this map as part of the Dodder Catchment Flood Risk Assessment and Management Study. The map identifies areas of predicted flooding along the Owendoher and Whitechurch streams, water levels for the 10, 100 & 1,000 year storm events are provided at various node points. Node points WS-3202 & WS-3204 are located along the Whitechurch Stream directly across the street from the subject site, the highest recorded flood levels at these points are; 52.02m (1:100 year event) and 52.30m (1:1000 year event). The lowest finished floor level at the subject site, 53.275m, is 1.2m above the 1:100 event and over 975mm above the 1:1000 event.

The site and proposed development is therefore not at risk should a flood event occur.

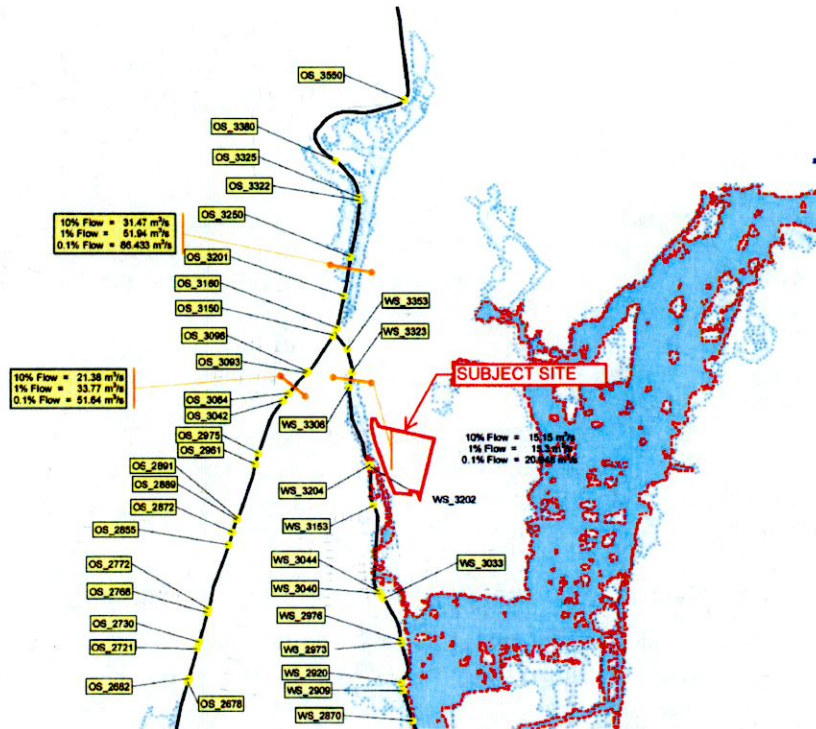


Figure 20 - Location of Subject site on RPS consulting engineers Dodder Catchment Flood Risk Assessment and Management Study Figure No. OSWS/EXT/UA/CURS/103

3.8 Further information Request Item 7:

The applicant is requested to submit the following information in relation to roads, access, and permeability:

(a) A full swept path analysis for the proposed development. The analysis shall demonstrate the safe and efficient access and egress of the private vehicles from each dwelling, in particular No. 20,19,18, 17, 8,7 and 6. The applicant is also requested to submit any revised plans that may be required considering the above information.

(b) A revised layout not less than 1:100 scale showing the location, design, and construction of an uncontrolled pedestrian crossing from the development to the footpath on the west side of Whitechurch Road, including safety barriers. To be constructed by the applicant/developer and at their own expense.

(c) A revised layout not less than 1:100 scale showing the pedestrian routes within the development.

- The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users.
- Footpath layout shall provide adequate connectivity around the development and footpaths on the main road.

3.8.1 Applicant Response to Item 7 (a):

We refer the planning authority to Section 2 and Appendix A of Transport Insights report where a detailed swept path analysis has been undertaken ensuring all car parking spaces within the development are accessible by vehicle.

The analysis has led to minor revisions to the site layout including:

- Revisions to vehicular carriageways to exclude previously proposed pedestrian refuge areas in order to ensure e4.8 meters wide shared surfaces and;
- Revisions to car parking bay dimensions in order to ensure manoeuvrability for private vehicles to each dwelling from the adjoining roadway.

3.8.2 Applicant Response to Item 7 (b):

We refer the planning authority to Section 3 and Appendix B of Transport Insights report where details of the uncontrolled pedestrian crossing has been prepared. The proposed uncontrolled pedestrian crossing is located at the pedestrian access to Willbrook Grove in order to better accommodate pedestrian movements and desire lines at this location. A drawing of the uncontrolled pedestrian crossing is illustrated in the figure below.

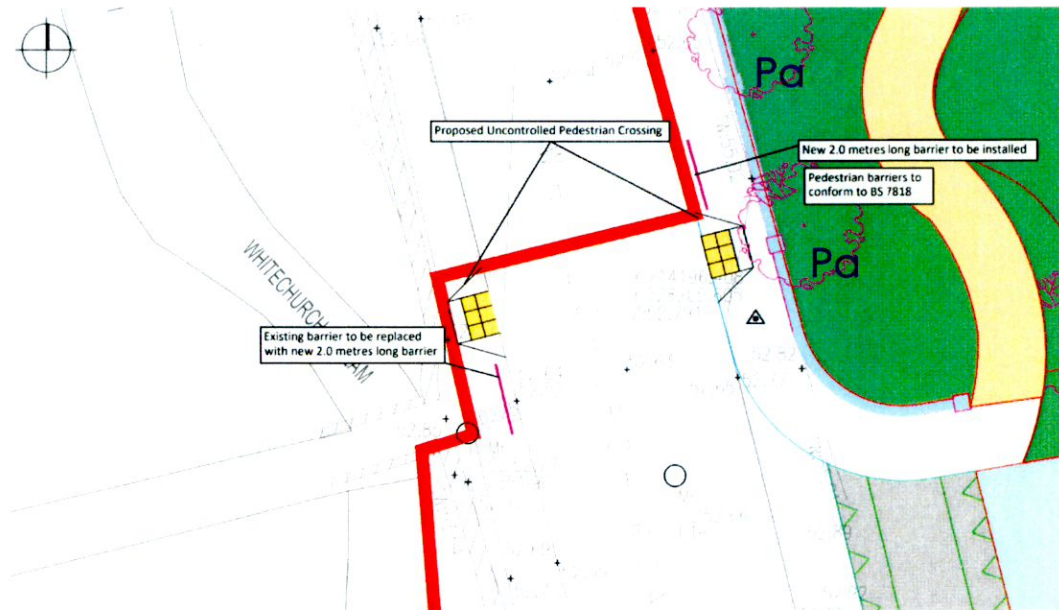


Figure 21 – Uncontrolled pedestrian crossing on White Church Road Drawing No. 2021 C725.1_1 v1.6 Prepared by Transport Insights

3.8.3 Applicants Response to Item 7 (c)

We refer the planning authority to section 4 and Appendix C of Transport Insights report illustrating the pedestrian routes within the development which are deemed to provide adequate pedestrian connectivity throughout the development. All footpaths are a minimum of 1.8 metres wide, as per the standards set out within the *Design Manual for Urban Roads and Streets (DMURS)*, 2019, which is sufficient width to allow two wheelchair users to pass each other.



Figure 22 – Pedestrian routes within the proposed development Drawing No. Transport Insights sheet 1 of 2 prepared by Transport Insights.

4 CONCLUDING COMMENT

The Applicant has made every attempt to address all items raised as part of the Further Information request and we trust that the Planning Authority will duly consider this submission in full in their assessment of the revised scheme. The following key points should be noted:

- The subject proposal is for 22no. units which are 3 storeys in height with a roof terrace;
- The subject proposal is reduced in height at the interface with Whitechurch Road to enhance the visual appearance of the scheme from the public road;
- Boundary treatments at the front of the site have been enhanced to improve the integration of the site with the existing surroundings;
- A series of high quality materials and finishes have been chosen for the scheme and that are suitable for the architectural conservation context in which the site sits;
- The rear garden space of proposed unit no.8 has been realigned to allow adequate private open space to be provided;
- The "Tara Hill" strip of land is outside the ownership of the applicant and is not impacted by the proposed development. The subject proposal is adequately set back from any piped infrastructure to avoid any impacts.
- Landscape and Tree Survey requirements have been appropriately responded to including confirmation that no trees of any significance exist on site or are being removed as part of the subject proposal, and additional tree planting is now proposed on site;
- Revised details in relation to surface water attenuation is submitted from POGA Consulting Engineers, including permeable paving, raingarden planter, swales and detention basin;
- Minor site layout revisions were undertaken following a transport review by Transport Insights, providing a comprehensive response to the queries of the Planning Authority.

The proposal now submitted addresses all concerns raised by the Planning Authority and any potential minor issues in addition to the above that may arise following consideration of this submission can be appropriately addressed by condition, should the Planning Authority be minded to Grant Permission. As such, we foresee there being no reason to seek clarification on any of the matters given the comprehensive response prepared by the design team in this case.

All considered, we trust that the Planning Authority will look favourably on the proposed development and grant permission for the proposal as appropriate.

5 Appendix

The following are the heights of 3 storey properties that have been granted in South Dublin County Council, Dublin City Council, Dun Laoghaire Rathdown County Council and Wicklow County Council previously.

Development Name	Address	Planning Reference	Height of 3 Storey dwelling
Marianella	Orwell Road, Dublin	2186/09 and 3784/18	12.22m
Printworks	Glasnevin, Dublin 9	DCC 4267/17	9.750m
Highfield Road	37A, Highfield Road, Dublin 6, D06 F6K5	DCC 2842/18	11.525m
Torquay and Westminster Road	Torquay Road and Westminster Road, Foxrock, Dublin 18, D18 X0V8	D17A/0441 and PL06D.249014	11.95m
Latouche Development Cove	Greystones	ABP- Ref. No. 27.245501	3 storey houses with roof terrace - Ridge Height 13,25m
Archers Development Wood	Delgany	ABP-311676-21	3 storey Houses - Ridge Height 12.15m
Mariavilla	Maynooth	PI Ref: ABP-301230-18	3 storey Houses - Ridge Height 12.65m

Marianella
Orwell Road, Dublin
Reg. Ref. 2186/09 and 3784/18
3 Storey houses Ridge height 12.22m



Figure - Marianella Orwell Road Dublin

Albany – Killiney

3 storey Houses – Ridge Height 11.32m



Figure – 3 storey Houses - Source – Google Images



Figure – 3 storey Houses - Source – Google Images

Latouche Cove Development – Greystones

PI Ref: ABP- Ref. No. 27.245501 – Granted by BP on the 17/02/2016.

3 storey houses with roof terrace – Ridge Height 13,25m



Figure – Latouche Cove Development – Greystones - Source – Google Images



Figure - Latouche Cove Development – Greystones – Source – Google Images



Figure - Latouche Cove Development Greystones – Source – Google Images



Figure - Latouche Cove Development Greystones – Source – Google Images

Archers Wood Development – Delgany

PI Ref: ABP-311676-21

3 storey Houses - Ridge Height 12.15m



Figure - Archers Wood Development - Delgany – 3 storey Houses - Source – 3 D design Bureau

Mariavilla – Maynooth

PI Ref: ABP-301230-18

3 storey Houses - Ridge Height 12.65m



Figure - Mariavilla – Maynooth – Source – Google Images



Figure - Mariavilla – Maynooth – Source – Google Images

As you can see the overall height of the proposed structures is in line with and in some cases lower than other similar 3 storey developments with traditional pitched roofs.

