

Senior Administrative Officer,
Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24.
D24 YNN5



Our Ref: 21080

2 September 2022

RE: SDCC PLANNING REG. REF. SDZ22A/0007

PLANNING APPLICATION FOR THE PROVISION OF 423NO. RESIDENTIAL UNITS (OF WHICH 166NO. UNITS ARE THE SUBJECT OF OUTLINE PERMISSION) WITH AN AREA OF 38,768.21 SQ.M. HOUSING UNITS BEING SOUGHT INCLUDE 75NO. 2-BED UNITS, 113NO. 3-BED UNITS AND 69NO. 4-BED UNITS RANGING FROM 2-3 STOREYS IN HEIGHT. OUTLINE PERMISSION IS SOUGHT ON A SITE OF 0.54HA FOR 1NO. APARTMENT BLOCK RANGING FROM 5 TO 9-STOREYS IN HEIGHT COMPRISING 11NO. STUDIO UNITS, 76NO. 1-BEDROOM UNITS AND 79NO. 2-BEDROOM UNITS. PROPOSALS ALSO INCLUDE 0.95HA OF PUBLIC OPEN SPACE, 488NO. CAR PARKING SPACES, 40NO. BICYCLE PARKING SPACES, 3NO. ESB SUBSTATIONS, VEHICULAR ACCESS TO THE DEVELOPMENT, A NEW BUS TURNING CIRCLE, BUS LAYBY'S AND ALL ANCILLARY SITE DEVELOPMENT WORKS, BOUNDARY TREATMENTS AND LANDSCAPE WORKS. THIS DEVELOPMENT AMENDS ASPECTS AT THE INTERFACE BETWEEN THE PROPOSED DEVELOPMENT AND THE DEVELOPMENT AT THE CROSSINGS CURRENTLY UNDER CONSTRUCTION AND PERMITTED UNDER REG. REF. SDZ20A/0017 (AS AMENDED BY SDZ21A/0021).

RESPONSE TO FURTHER INFORMATION REQUEST

Dear Sir/Madam,

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26/27 Upper Pembroke Street, Dublin 2, are instructed by the Applicant, Adamstown Station & Boulevard Ltd., 6th Floor, Fitzwilliam Court, Leeson Close, Dublin 2, to lodge this response to the request for further information dated 30 June 2022.

This Further Information Response has been prepared by Stephen Little & Associates, Chartered Town Planners and Development Consultants with significant inputs from the following consultants: -

- McCauley Daye O'Connell (MDO) Architects
- NMP Landscape Architects
- Atkins Consulting Engineers
- iAcoustics Integrated Acoustic Solutions

The Applicant's formal response comprises this letter and the accompanying Further Information Plans and Particulars enclosed herewith. A list of enclosures is provided at the end of this letter.

6no. copies of the Further Information material are submitted in accordance with the requirements set out in the Request for Further Information dated 30 June 2022.

We confirm that prior to making this submission that the proposed responses to the items raised have been discussed with the Planning Authority.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

Yours sincerely,



Stephen Little
STEPHEN LITTLE & ASSOCIATES

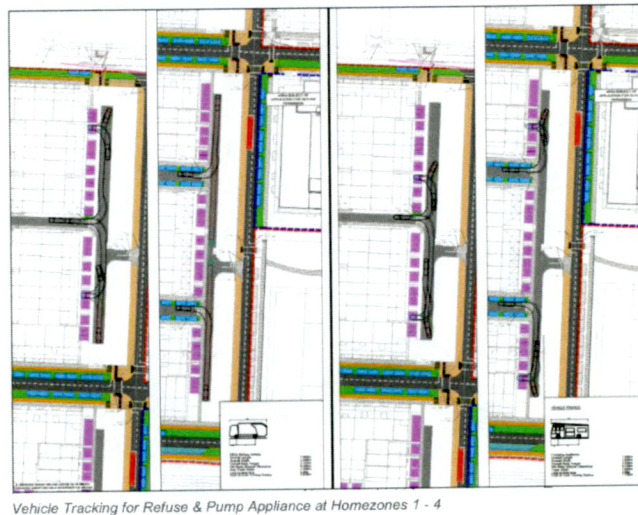


Figure 1: Extract from Memo, prepared by Atkins Consulting Engineers showing Refuse Vehicle and Pump Vehicle Tracking for the 4no. proposed Homezones.

- (b) The Adamstown Way junction has been revised in order to allow for vehicle access, as shown in Figure 2 below. This has involved adjusting the proposed road markings on Adamstown Way. We additionally refer the Planning Authority to the enclosed Drawing No. 5150924/HTR/SK/002, prepared by Atkins Consulting Engineers.

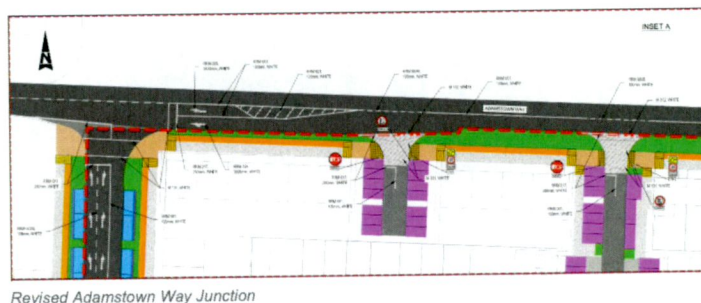


Figure 2: Extract from Memo, prepared by Atkins Consulting Engineers showing revised Adamstown Way junction.

1.2 FI ITEM 2: TRAFFIC NOISE IMPACT ASSESSMENT

The Environmental Health Department request the applicant to submit a Traffic Noise Impact Assessment to include:

(1) An acoustic assessment must be undertaken by a suitably qualified acoustic consultant describing and assessing the potential noise impact of the nearby railway line on the proposed development. The investigation must include, but not be necessarily limited to, the following:

- (a) The identification and cumulative assessment of all sources of traffic noise on the proposed development.*
- (b) An assessment of the existing background (LA90,15 min) and ambient (LAeq,15 Min) acoustic environment at the receiver locations.*
- (c) Distances between the proposed development and the nearest noise sources (i.e traffic noise) and the predicted level of noise (Laeq, 15min) from these noise sources when assessed at the boundary of the proposed development.*

(e) A statement outlining recommended acoustic control measures that should be incorporated into the design and construction of the proposed houses and/or site to ensure the use will not create adverse noise impacts on the occupiers. This should include parameters for walls, glazing doors and ventilation for the proposed development.

Applicant's Response:

In the first instance we refer the Planning Authority to the enclosed Acoustic Report, prepared by iAcoustics which addresses the matters raised in this Item. This Assessment identifies a limited number of areas within the development proposed that requires a mitigation measure to be employed having regard to the local noise environment created by the rail line. We note that in time with the advent of the DART+ programme that the intention is to electrify the suburban line here which will have a beneficial impact to the noise environment overall, although it is acknowledged that the intercity rail service will continue on this rail corridor also. This document addresses all points of this FI Request Item.

As outlined in the enclosed Design Statement, prepared by MDO Architects, the following acoustic control measures have been incorporated into the design to ensure that the proposed use will not create adverse noise impacts on occupiers:

- *To reduce noise exposure in private gardens, a 2.4m solid brick wall has been recommended, in specific locations.*
- *Enhanced glazing build up has been recommended for dwellings facing the railway line (Station Road).*
- *The proposed windows will achieve the recommended value of 41dB.*

We additionally refer to the enclosed RFI Response Document and Drawing Number L1-101, prepared by NMP Landscape Architecture for further details of the proposed acoustic block wall.

1.3 FI ITEM 3: UNIT DESIGN

(a) The applicant is requested to increase openings on the following end of terrace dwellings to increase passive surveillance:

- H3AA
- H3DA

(b) The applicant is requested to provide revised boundary treatment details/landscaping details for the boundary of the properties close to the properties to the west.

(c) The applicant is requested to provide further details of each landmark structure, excluding the structure contained within the apartment complex. In this regard, the applicant should demonstrate that each building would be of significant design quality, so that they are clearly discernible from adjacent buildings.

Applicant's Response:

- (a) We refer the Planning Authority to the enclosed Drawing Nos 1238-MDO-H3AA-ZZ-DR-A-07001 and 1238-MDO-H3DA-ZZ-DR-A-07001 and the Design Statement, prepared by McCauley Daye O'Connell Architects.

In order to increase passive surveillance at dwelling H3AA, it is proposed to mirror the floor plan on Level 0 and Level 1. The outcome of this is that the passive surveillance is increased due to an increase in the quantum of windows on the side elevation.

In order to improve passive surveillance at dwelling H3DA, it is proposed to increase the extent of windows on the side elevation, therefore increasing passive surveillance onto the street.

- (b) We refer the Planning Authority to the enclosed Landscape Architecture RFI Response, prepared by NMP Landscape Architects. In order to ensure that the existing hedgerow is protected during construction and operation phases and the proposed boundary treatments (temporary and permanent) have been prepared in coordination with the project arborist.

We refer to the enclosed Drawing No. L1-102 prepared by NMP Landscape Architecture for details of the proposed temporary boundary treatments. The temporary boundary treatment is to be a block and mesh fence aligned 1 – 2 m from the edge of the root protection zone for the existing hedgerow to protect biodiversity during construction. A paladin fence is proposed during construction around the existing oak tree to be retained in the proposed pocket park in order to protect it.

We refer the Planning Authority to the enclosed Drawing No. L1-101 prepared by NMP Landscape Architecture for details of the proposed permanent boundary treatments. End of terrace side boundaries will be block walls of up to 1.8 m in height. All other proposed permanent boundaries will be hit and miss timber fences with precast concrete posts. Where these boundaries are along the hedgerow being retained, the foundations will be reduced and spaced every 1.8 m in order to minimise impact on the hedgerow root protection area.

- (c) We refer the Planning Authority to pages 15 – 23 of the enclosed Design Statement, prepared by MDO Architects in response of this FI Item.

In order to further emphasise the landmark features, the proposed alterations are proposed, in summary:

Unit Type H3DA renamed to H3DD, with the following changes:

- Increase brick detailing extent to exposed gables;
- Increase the height of the building by increasing the ground floor to ceiling height including windows and door;
- Maintain alternative brick colour to clearly differentiate from the adjacent buildings;
- Increase window extent as a consequence of the passive surveillance RFI query.

Unit Type H4HA:

- Alternative brick detailing to exposed gables, turning corner.
- Increased floor to ceiling height, including windows and door at ground floor (resultant increase in height of building).
- Maintain alternative brick colour to clearly differentiate from the adjacent buildings.

Unit Type H4HAF:

- Brick detailing added to all windows / exposed gable;
- Increased height of building maintained to provide contrast with adjacent development.

Unit Type H4BCF3:

- Terrace of 5no. buildings treated as a Landmark building;
- Alternative brick detailing to exposed gables turning the corner;
- Increase the height of the building by increasing the ground floor to ceiling height including windows and door;
- Alternative brick colour to differentiate from the adjacent buildings.

- Vary the roof profile from the neighbouring terrace to ensure this terrace is discernible from the others along the Linear Park.

1.4 FI ITEM 4: PARK AND RIDE

The NTA has requested that the temporary park and ride on the subject site be retained until such a time as a permanent park and ride is available. The applicant is requested to provide a response to the concerns raised by the NTA in this regard.

Applicants Response:

It is not proposed to retain the existing temporary park and ride facility on site. Anecdotal evidence suggests that this temporary park and ride is in use predominantly by construction workers, with limited cars parked in this facility on a daily basis. It is proposed to use the existing car park located in the Adamstown Square Development Area as a replacement temporary park and ride car park. This contains 26no car parking spaces, including 2 spaces for disabled drivers. We can confirm that the lands on which this car park sits are in the control of the Applicant.

It is proposed that this replacement temporary park and ride facility will not be made available for use by construction workers.

The proposed replacement temporary park and ride facility is located a 4 minute walk from the Adamstown Train Station, approximately 386m away. The existing park and ride facility is located a 4 minute walk from the Adamstown Train Station, approximately 364m away.

Figure 3 below shows the approximate relative proximity of the existing temporary park and ride versus the location of the proposed temporary park and ride facility. We additionally refer the Planning Authority to the enclosed Park and Ride Drawings, prepared by Atkins Consulting Engineers which accompany this submission.

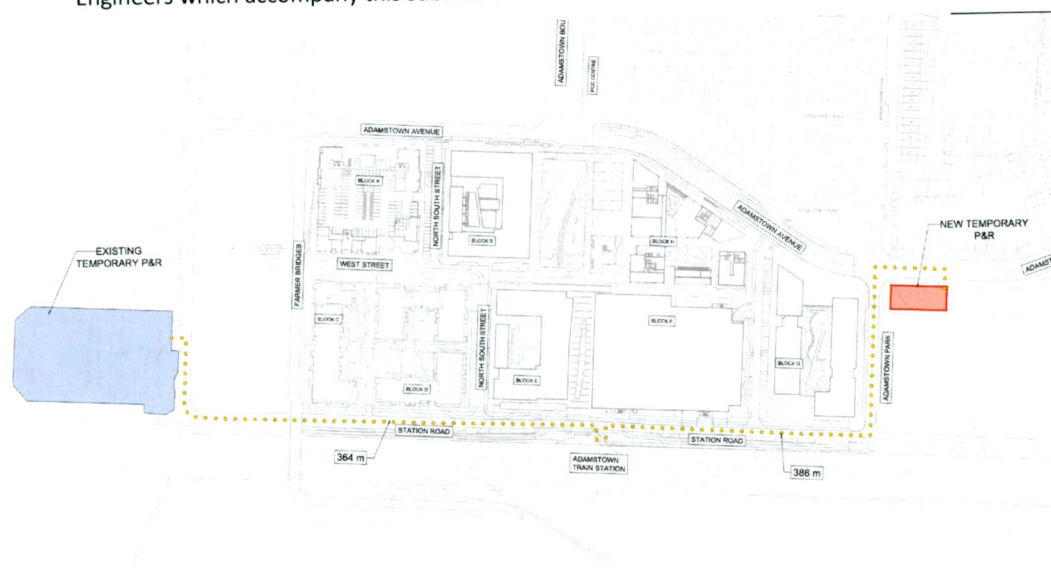


Figure 3: Extract from Drawing Number 5150924/HTR/10/SK/0004 'Existing and New Temporary P&R', prepared by Atkins Consulting Engineers

We would invite the Planning Authority to attach a Condition to a grant of Permission in this case which requires the replacement temporary park and ride to be operational, including obtaining any permissions necessary to enable this to occur, prior to works commencing on Phase 3 of the proposed housing element of the current project (ie where the present temporary park and ride is located); thereby ensuring that a temporary park and ride will remain in place to serve Adamstown.

1.5 FI ITEM 5: EIAR

Having regard to the nature and scale of the proposed development and pursuant to Schedule 5 of the Planning and Development Regulations 2001 (as amended), the Planning Authority is not satisfied from the information submitted that the proposal is not a class of development for which a mandatory Environmental Impact Assessment Report is required. The application form states that the site area is 10.14ha. Under Schedule 5, Part 2 (10) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. The applicant is requested to address the requirement for EIAR.

Applicant's Response:

It is proposed to amend the red line around the apartment building proposed for Outline Permission in order to remove the existing roads from this area which do not in fact need to be in the red line as they are already in situ. This has allowed the overall red line to be reduced to 9.97Ha.

We refer the Planning Authority to the enclosed Environmental Impact Assessment Screening Report, prepared by Stephen Little and Associates and the Design Statement, prepared by MDO Architects which considers the need for an EIAR in this context.

The enclosed EIA Screening shows that an EIAR is not required for this development, concluding:

"It may be concluded that, by reason of the nature, scale and location of the proposed development, and having regard to the mitigation measures identified in the expert environmental reports that accompany the application, the proposed development would not be likely to have significant effects on the environment.

We would therefore submit to the Planning Authority that an Environmental Impact Assessment Report for the proposed development should not be necessary in this case. We acknowledge however that the Planning Authority is the competent authority in this matter."

1.6 FI ITEM 6: PUBLIC OPEN SPACES

While it is noted that the applicant has indicated that the proposed public open space provision would significantly exceed the minimum quantum required by the Planning Scheme, for this site, concerns are maintained that areas to the south (adjacent Station Road) and to the west of the site (areas which contain the existing hedgerow) may not be usable public open space. The applicant is therefore requested to provide further information in relation to the usability of these spaces.

Applicant's Response:

We refer the Planning Authority to the enclosed Drawing No. L1-104, prepared by NMP Landscape Architects, which shows the proposed areas of public open space and of biodiversity enhancement. It is noted that the areas of biodiversity enhancement are not intended as usable public open space.

Additionally, we refer the Planning Authority to Drawing No.1230-MDO-ZZ-XX-DR-A-05003 which shows the proposed taking in charge for the development as submitted as part of the original planning application.

2 DESIGN DEVELOPMENT

We also attach herewith for the attention of the Planning Authority a Brochure prepared by MDO Architects. The Brochure illustrates examples of the changes to the houses being proposed. These changes primarily relate to the external appearance of the units, but some internal layout adjustments are being sought to certain Unit Types. These adjustments have arisen from a design development process that has been progressing since the planning application has lodged.

The enclosed Brochure depicts each Unit Type as lodged at Planning Application stage and also as it is now envisaged following Design Development, where adjustments are being sought. For each Unit Type that is adjusting, the Architects have set out in clear red text a list of the design modifications proposed and have put a red bubble around the plans, elevations effected by these modifications.

Whilst we are aware that these adjustments can not be incorporated as part of a Response for Further Information, the Planning Authority are invited to attach a suitably worded Condition that would allow for these details to be submitted and agreed in writing with the Planning Authority as compliance with any Permission that is forthcoming.

3 CONCLUSION

We trust that this further information response provides the necessary clarification for the Planning Authority to enable it to proceed to complete its assessment and arrive at a favourable decision in respect of the proposed development subject of this planning application, which seeks permission for the development of Phase 1 of Adamstown Boulevard, Adamstown SDZ, Lucan, County Dublin.

STEPHEN LITTLE & ASSOCIATES

2 September 2022

ENCLOSURES

6no. copies of the following Further Information Plans and Particulars are enclosed as follows:

1. Environmental Impact Assessment Screening Report, prepared by Stephen Little & Associates.
2. Architectural Drawings prepared by MDO Architects (refer to enclosed Drawing Register).
3. Architectural Design Statement prepared by MDO Architects.
4. Further Information Response Memo, prepared by Atkins Consulting Engineers.
5. Roads Drawings prepared by Atkins Consulting Engineers (refer to enclosed Drawing Register).
6. Acoustic Report, prepared by iAcoustics.
7. RFI Response, prepared by NMP Landscape Architecture
8. Landscape Drawings, prepared by NMP Landscape Architecture (refer to enclosed Drawing Register).
9. Brochure entitled Design Development prepared by MDO Architects

1 RESPONSE TO FURTHER INFORMATION REQUEST

For the convenience of the Planning Authority, this Further Information Request submission sets out below the text of each FI Item followed by the Applicant's Response.

1.1 FI ITEM 1: REVISED ROAD LAYOUTS

The applicant is requested to provide:

(a) A revised layout of not less than 1:200 showing a turning area at the end of Homezones adjacent to the linear park, or an autotrack showing vehicle manoeuvres to allow for safe turning.

(b) A revised layout of not less than 1:200 showing the road layout for the vehicle access at the northern end with Adamstown Way.

Applicant's Response:

In the first instance, we refer the Planning Authority to the FI Response Memo and drawings, prepared by Atkins Consulting Engineers. In summary however, following discussions between Atkins and the Roads and Transportation Department wherein the rationale for the design approach to the ends of the Homezones were explained, it was agreed that no change from that initially proposed would be required.

(a) In conjunction with other design team disciplines Atkins Consulting Engineers examined several turning head options in order to facilitate turning for each of the four homezones (refer to enclosed Drawing No.5150924/HTR/SK/0001, prepared by Atkins Consulting Engineers). Two issues were identified with all options for this, as outlined in the enclosed FI Response Memo:

1. *"Significant reduction in pedestrian and cycling connectivity. According to the Design manual for Urban Roads and Streets, designers must place pedestrians at the top of the user hierarchy. The introduction of turning heads for the homezones would limit connectivity while introducing longer walking distances for pedestrians. This shown in the two figures below (pedestrian and cycling connectivity with and without the turning heads).*
2. *The introduction of turning heads onto the homezones would result in encroachment onto linear park and associated landscaping. This would, once again, reduce the beneficial impact of the linear park itself by limiting connectivity to stream road."*

In order to address the problems identified above, it is proposed to retain the original layout. As shown in Figure 1 below, refuse and pump appliance are able to turn via reverse movements. Additionally, it is anticipated that refuse collection will occur during off-peak times and can therefore use the parking bays which will be free to facilitate turning. We additionally refer the Planning Authority to the enclosed Drawing No. 5150924/HTR/10/SK-0003, prepared by Atkins Consulting Engineers).