

Kiaran O'Malley & Co. Ltd
St. Heliers
Stillogran Park
Blackrock
Co. Dublin

**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING
REGULATIONS THEREUNDER**

Decision Order Number: 1246	Date of Decision: 03-Oct-2022
Register Reference: SD22A/0323	Registration Date: 08-Aug-2022

Applicant: Ciaran Reilly

Development: Demolition of a shed & workshop at rear of the Protected Structure to facilitate the provision of 18 car parking spaces; Construction of 12 dwellings comprising of 8 two storey with attic level accommodation, 4 bedroom semi-detached dwellings (c. 146sq.m each and 4 two storey with attic level accommodation, 3 bedroom semi-detached dwellings (c. 126 sq.m each) with vehicular access at main street; A pedestrian access to Forest Hills at the southern end of the site and ancillary site development works all within the curtilage of a Protected Structure.

Location: Main Street, Rathcoole, Co. Dublin

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 08-Aug-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. Architectural Conservation.

(A) The proposed development includes for the demolition of a shed and workshop at the rear of the Protected Structure to facilitate the new back land development. The shed and workshop structures are of modern construction and/or of no architectural merit, however it is considered that details should be provided on how the Protected Structure will be safeguarded during the proposed demolition and proposed construction of the new development. Details around how the Protected Structure will be protected and safeguarded during the proposed demolition and construction works is requested.

(B) It is considered that the proposed development within the curtilage of the existing Protected Structure is an opportunity to improve the overall setting to the front and rear of the Protected Structure. In order to improve the setting of the Protected Structure and streetscape setting, a landscape plan that provides new soft planting and trees to the front site and the rear area of the Protected Structure should be submitted. It is noted that the proposed front boundary wall will be improved with the insertion of granite capping and iron railings with planting along the wall but it is felt more planting and soft landscaping is required to remove the amount of hard surface and improve the overall landscape setting of the front site and rear site of the Protected Structure.

(C) It is proposed to provide a new entrance piers to the west of the site for access to rear parking behind the Protected Structure, one of the piers is extremely close to the existing building and therefore this needs to be addressed. The removal of these gate piers should be considered.

2. Roads.

The applicant is requested to provide:

(A) a stage 1 road safety audit with regard to the vehicular access/egress point.

(B) a rationale for the choice of vehicular access location, and to consider if this is the safest access point. Alternative access points include access from the west (via Courthouse apartments access street - not taken in charge), and from the north-west (via western access around protected structure).

3. Street Layout.

In order to address the issues listed below, the applicant is requested to provide: a revised street layout and surface material treatment details, including as necessary works to the public realm on Main Street. The layout should be fully dimensioned, include road-markings/signage, kerb radii, road widths and sightlines, surface and lining details:

(A) There would be poor visibility at the vehicular access junction, with vehicles exiting without full sight of pedestrians crossing. A revised layout should prioritise pedestrian movement, comfort and safety as reflects the village centre setting (reflecting also the public open space amenity to the rear if that is proposed).

(B) The access street bisects the area of potential public open space, and is routed around a new car park. Notwithstanding the request for detail on the car park, it is considered that the layout duplicates vehicular roadspace unnecessarily, to the detriment of public amenity space. Additionally the access road is provided with loose corners. The access street and parking should be integrated with one carriageway provided, and designed so as to maximise the quality and quantity of a single useable green space within the site.

(C) The pedestrian footpath contains a number of staggered turns, which would provide difficulties for lesser able pedestrians and in design terms relegates the pedestrian to a peripheral consideration. Applicant to provide a road layout drawing that shows a formal road and footpath delineated with continuous unstaggered kerbing, and that runs from the vehicular access with a minimum width of 1.8 m throughout the development.

(D) The pedestrian connection to Forest Hills is welcome in principle and would open up permeability in the village core. The footpath would suffer from a lack of passive surveillance and would have a closed, narrow, alleyway character, for that stretch to the west of unit No. 9. The footpath should be widened and opened up to passive surveillance. This can be achieved with the reorientation and/or reconfiguration of units 9 - 12 to align with units 1 - 8, with provision of a turning circle as appropriate for traffic.

4. Roads - Swept Path Analysis.

It is unclear if certain vehicles can access and move around the development. The applicant is requested to provide swept-path analysis demonstrating:

- i. Emergency vehicle access/egress/turning throughout the site
- ii. How cars egress from parking at No. 12 (note: provide similar indications if layout is revised).
- iii. how perpendicularly parked cars can reverse into and/or out of car parking spaces / driveways, in any instance where a 6m reversing distance clearance, is not being provided.

5. Footpath.

The site to the south is not in the ownership of South Dublin County Council. The applicant should consult with the owner(s) (which may be a management company) of the lands to the south and provide the result of these consultations as additional information. If possible, the applicant should obtain consent from the adjoining land owner for the full connection through the southern boundary of the site.

6. Public Realm - Play Areas.

The applicant is requested to submit a detailed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using natural and nature-based solutions, to provide informal, impromptu and spontaneous play opportunities, along with play equipment that provides appropriate challenges for multiple age groups. The Layout Plan shall comprise the following: -

- showing types of play and play area(s),
- target age groups,
- landform (included levels and contours) and boundaries,
- design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface.

All play equipment and ancillaries shall conform to European Standards EN 1176-1-11 and EN 1177 Playground equipment and surfacing, and to BS/EN standards 2017/18 for Playground Installations for HIC (Head Injury Criterion) and CFH (Critical Fall Height).

The applicant should show compliance with the following policy in the South Dublin County Development Plan 2022 – 2028:

- Policy COS4 Objective 6;
- Policy COS5 Objectives 19 to 28;
- Section 12.6.10 guidance on Children's Play Areas (noting requirements for schemes of more than 10 units and predominantly 3+ bedroom units).

7. Public Realm - Landscape Plan and Details.

The applicant is requested to provide additional information and consider a possible re-design to address the following issues:

- (a) The applicant has not provided details as to the levels and gradients within the proposed public open space areas. The developer is requested to submit level details for the open space areas, this shall include cross section drawings where applicable.
- (b) As required under the current County Development Plan; Development should seek to maximise the use of permeable surfaces, as well as opportunities for stormwater attenuation and storage through SuDS and limit the use of underground attenuation and storage. In addition, SuDS measures will only be accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.
- (c) There is a lack of street tree planting. The applicant is requested to provide a standalone plan that

clearly identifies street trees to be planted within the Public Realm and those that contain SuDS Features. On-street car parking to the north of the development shall be combined with regular tree planting and a high standard of kerbing and paving. It is a general objective that not more than five perpendicular or two parallel car parking spaces be allowed between trees. Trees shall be planted into a porous material with structural root soil and constructed tree pits between the car spaces. Tree pits shall contain SUDS features.

8. Public Realm - Public Open Space.

(A) The applicant should demonstrate compliance with the following policies, objectives and guidance in the South Dublin County Development Plan 2022 - 2028:

- Policy H8: Public Open Space
- Section 8.4.1 in particular as it relates to public open space
- Policy COS5, COS5 Objective 4, 5, 6 and 7, and Table 8.2 of the Plan, as they relate to the required provision (or contributions in lieu of) public open space.

(B) The revised site layout should maximise the quality of the public open space and enlarge it by way of reducing the spatial impact of access and parking arrangements.

9. Green Infrastructure.

(A) In compliance with Policy GI5 Objective 4 and section 12.4.2 of the County Development Plan, the applicant is requested to submit A Green Space Factor (GSF) worksheet for the proposed development, detailing how they have achieved the appropriate the minimum Green Space Factor (GSF) scoring established by their land use zoning. The minimum required score for the 'RES' and 'VC' zones is 0.5. A worksheet can be obtained from the SDCC Public Realm Department.

Developers can improve their green factor score by retaining existing landscape features and incorporating new landscape features and GI interventions. Completed Green Space Factor (GSF) worksheets should be submitted to SDCC with the Green Infrastructure Plan and Landscape Plan for a proposed development.

(B) In compliance with section 12.4.2 of the County Development Plan, the applicant is requested to submit a Green Infrastructure Plan which should include the following:

- Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;
- Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;
- Indicate how the development proposals link to and enhance the wider GI Network of the County;
- Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site;
- Proposals for identification and control of invasive species.
- an overall site summary quantifying and detailing the following: tree and hedgerow removal; tree and hedgerow retention; and new tree and hedgerow planting.

10. Sustainable Movement - Car Parking.

The applicant has not provided an explanation for the provision of car parking spaces 1 to 8 to the rear of the protected structure. It is unclear if these are proposed to serve the office premises, the village in general, or a combination. The 10 spaces (sometimes counted as 9 in the applicant's documents) proposed as visitor spaces to the residential area are not in keeping with the South Dublin County Development Plan 2022 - 2028; though there may be potential for mixed function spaces which would

serve complementary uses (office and residential visitors) at different times of the day. The applicant shall provide a written rationale and revised plans as necessary to address these points.

11. Taking in Charge.

The applicant is requested to provide a Taking in Charge Plan to demonstrate which parts of the scheme are to be taken in charge.

12. Archaeology.

(A) The applicant is requested to engage the services of a suitably qualified Archaeologist to carry out the Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Test Excavation to respond to this request for Further Information. No sub-surface work shall be undertaken in the absence of the archaeologist without their express consent.

(B) The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site and the boundary walls (consulting appropriate documentary sources) and review all cartographic sources and aerial photographs for the area.

(C) The Archaeological Test Excavation must be carried out under licence from the Department of Housing, Planning and Local Government, and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.

(D) Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from the Department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.

(E) Having completed the work, the archaeologist shall submit a written report to the Department and the Planning Authority describing the findings of the AIA and the results of the Archaeological Test Excavation. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.

(F) Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate.

13. Village Amenities.

The proposed development does not include any public realm improvements to the front of the site, on Main Street, Rathcoole. The applicant is requested to propose public realm improvements and to provide an urban design rationale for their proposals, as part of additional information. The County Development Plan envisages some coordination between developers and the council, and this can be incorporated into a condition of permission as necessary. The applicant should demonstrate that the scheme complies with or can support the following policies and objectives of the County Development Plan:

- Policy NCBH23 Objectives 3, 4, 5, and 6;
- Policy QDP3 objective 2;
- Policy QDP6 objectives 2, 3 and 5;
- Policy EDE13 Objective 2;

- Policy SM2 Objectives 12 and 17; and
- Policy SM7 Objective 7.

14. Irish Water.

The applicant is requested to submit a Confirmation of Feasibility from Irish Water with regard to both water supply and wastewater connections for the proposed development.

15. Noise.

The site is located within the Significant Noise Boundary of Casement Aerodrome. The principles of residential development is not contested at the site; however, appropriate noise assessment should be undertaken and mitigation measures to protect residential amenity should be proposed by way of additional information.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked “ADDITIONAL INFORMATION” and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD22A/0323

Date: 06-Oct-2022

Yours faithfully,

Pamela Hughes
for **Senior Planner**