

Principal Officer
South Dublin County Council,
Planning Department,
County Hall,
Town Centre,
Tallaght, Dublin 24.



29th September 2022

Re: Demolition of existing detached bungalow and construction of 2 No. 264 sq.m. detached two storey with developed roof space 4 bedroom plus study dwelling houses and associated site works at, St. Francis, Owendore Avenue, Rathfarnham, Dublin 14 SD22A/0288

Dear Sir/Madam,

We confirm we are in receipt of your Request for Additional Information dated 22nd August 2022 Decision Order No. 1085 in connection with the above referenced application for planning permission.

We herein submit the following information and commentary in response to 5 No. items raised:

1. Re-use of Older Buildings.

The South Dublin County Development Plan 2022 - 2028 seeks the retention and re-use of older vacant buildings (see section 3.6 and policy NCBH24, and NCBH24 objectives 1 and 2). The applicant has not provided a rationale for the full removal of the existing bungalow and delivery of an entirely new house in the same location. In support of policies to reduce carbon footprint where re-use of a building is possible, in particular policy NCBH24 objectives 1 and 2, the applicant is requested to demonstrate how the existing structure of the bungalow might be re-used in full or (more likely) in part, as part of the redevelopment of the site, or to demonstrate why it should be demolished if re-use is impossible.

We respectfully submit that the existing bungalow on this site is not a property to which the Development Plan Policy Objective NCBH24 Objective 1 can reasonably be applied as it is not within "...towns, villages and Architectural Conservation Areas." We further submit that the bungalow is not a property to which the Development Plan Policy Objective NCBH24 Objective 2 can reasonably be applied as it is not an "historic building" in the real sense. Furthermore, the application of the policy outlined in Section 3.6.1 to this proposal would be inappropriate as it would not assist in achieving "compact growth" nor could it be considered to "protect the special physical, social, economic and cultural value of built heritage assets".

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The existing bungalow on the site is of mid-20th Century, medium to low quality construction with asbestos-cement roof slates and numerous lean-to shed and garage extensions. Our client has commissioned an asbestos report which has identified a considerable extent of potentially hazardous material, over and above the roof slates referred to above. All of this material will have to be carefully removed and disposed of appropriately. We enclose a copy of the report received.

While our client understands and accepts the merits of Policy NCBH24, under the given circumstances our client is willing to commit to conservation and re-use, where possible and appropriate, of those elements or construction materials that can safely be retained on site. We do submit however that at construction stage it may not turn out to be possible to retain enough of the existing dwelling to avoid the requirement for planning permission for its demolition.

2. Sustainable Movement.

The applicant is requested to provide revised plans showing:

- (a) the provision of car parking for 3 vehicles to serve the two dwellings.*
- (b) the continuation across the front of the site, of the footpath that runs in front of Nos. 1, 2 and 3 Owendore Avenue. This shall be proposed to be taken in charge.*
- (c) a revised drawing showing a min 6m distance from front wall to building line at the front of the houses.*
- (d) swept-path analysis showing how vehicles will safely access and egress the site.*

(a) We submit, on our client's behalf that given the nature of the proposal; being for 2 No. family sized detached dwellings, and the location of the site at the end of a 'cul-de-sac' with only pedestrian access through to Butterfield Avenue, the provision of shared off-curtilage parking would be inappropriate and extremely difficult to achieve. We submit that the proposal of 2 No. spaces, in-curtilage' is more appropriate and in combination with the addition of the extended footpath is a preferable solution for the development in this location.

(b) Our enclosed drawing no. 21/035/PA100Rev1 indicates the continuation of the footpath along Owendore Avenue across the front of the site.

(c) Our enclosed drawing no. 21/035/PA100Rev1 indicates the dimensions achieved from the front wall of the proposed houses all of which are in excess of 6m.

(d) We enclose six copies of Drawing No. 22-253-C02 prepared by our client's consulting engineers RS Consulting Engineers indicating the autotrack swept path analysis for access and egress of the development.

3. Boundary Treatment.

The applicant is requested to submit elevation drawings specifying the proposed boundary treatment to the front of the site.

We enclose six copies of our revised drawing no. 21/035/PA100Rev1 which also indicates the proposed boundary treatment which is designed to match the existing public realm in Butterfield Crescent and Owendore Avenue.

4. Sustainable Drainage Systems.

(A) The applicant should demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems.

(B) In relation to SUDs, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates, and showing what SuDS (Sustainable Drainage Systems) are proposed.

(C) SUDs Management - The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.

(D) Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. 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. Note: If tree pits are proposed, SuDS bioretention Tree pits to be installed in trees within/draining areas of hard standing. Tree Pits to incorporate SuDS bioretention features and sufficient growing medium. SuDS details need to show how the water drains from the road/pavement hard surface into the SUDS tree pit, clearly outlining how SuDS features within the tree pits will function. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

(E) The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m3 . Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m2 are proposed such as, green roofs, permeable paving, buildings, roads and their respective run

off coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

We enclose six copies of drawings nos. 22-253-C01 & C02 and six copies of Engineers' Report of RS Consulting Engineers in response to this request and outlining compliance with SuDS requirements.

5. Green Infrastructure.

The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:

(a) To demonstrate how they intend to reduce fragmentation of existing green infrastructure. The applicant should provide a green infrastructure plan showing connections through the site and connections to wider GI network.

(b) To demonstrate how the appropriate Greening Factor will be achieved for the relevant land use zoning objective.

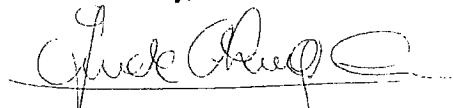
We note and welcome the recent introduction of 'Greening Infrastructure' requirements and 'Greening Space Factors' in the context of new developments in the county. This application for two houses, on an infill site, is at the lowest limit for the inclusion of these requirements. In that context we have studied these new requirements and would submit the following in response;

(a) The nature of this proposal being on a single fronted, land-locked infill site is such that the potential for reducing fragmentation of existing green infrastructure is virtually zero. With existing residential properties on either side and the local police station directly behind there is neither potential to reduce fragmentation nor provide any connections through to the wider GI network. While the site benefits from being proximate to the GI Network provided by the Owendoher and Dodder Rivers it is nonetheless fully physically detached from these amenities and therefore unable to contribute any connection.

(b) The appropriate Greening Factor for the development site is 0.5. On a site for site basis the proposed houses cover approx. 46% or nearly half of the sites, meaning that the rest of the sites, parking areas, patio and garden, would have to be covered in 'Preserved hedgerow' in order to be able to meet the required standard. We have not been able to access the 'Green Factor Worksheet' in order to determine the exact factor we have achieved but based on our calculations and the formula set out in the Guidance Note we estimate a Factor of 0.25 can be achieved with the modest extent of soft landscaping proposed. We respectfully submit that this be considered a reasonable provision under these circumstances.

We trust the above is in order and continue to look forward to an early and favourable decision on this application.

Yours sincerely,



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Director
NDBA Architects

Our Ref: 21/035