

# Comhairle Chontae Atha Cliath Theas

**PR/1319/22**

## Record of Executive Business and Chief Executive's Order

**Reg. Reference:** SD22A/0342      **Application Date:** 23-Aug-2022  
**Submission Type:** New Application      **Registration Date:** 23-Aug-2022

**Correspondence Name and Address:** KPMG Future Analytics 1, Stokes Place, St. Stephens Green, Dublin 2

**Proposed Development:** Construction of a four-storey apartment block ( 4224 sq.m) consisting of 58 age friendly residential units comprising 20 one bedroom units and 38 two bedroom units with associated private balconies, associated lift and stair cores, entrance lobby, and circulation space; Provision of a community facility (99.3 sq.m) and ancillary accommodation including refuse store (26.9 sq.m), cycle store (36 sq.m), plant room (46.2 sq.m), sub-station (14 sq.m), switch room (16 sq.m), landscaped public open space (907.4 sq.m) and communal open space (1225.6 sq.m), and 30 car parking spaces and 80no. cycle parking spaces to serve the development; Vehicular access to the development will be provided via an upgraded entrance from Tay Lane with a minor pedestrian access provided from Eaton Drive to facilitate direct linkages to the town centre; Planning permission is also sought for all ancillary site and development works above and below ground to facilitate the development including the provision of internal access roads and pedestrian / cycle pathways and linkages, boundary treatment, public lighting, hard and soft landscaping, services, rooftop PV panels and associated signage.

**Location:** Lands located to the east of Tay Lane, Newcastle Road, Rathcoole, Dublin 24

**Applicant Name:** Riverside Projects Limited

**Application Type:** Permission

### **Site Description and Surroundings**

This is a greenfield site in Rathcoole Village, located between the site of Glebe House to the south, Eaton Square development to the east, and the N7 to the north. Irregularly 'L' shaped, the site adjoins St. Brigid's Cottage, a single house with outbuildings on a large plot to the north and west. The site is accessed from St. Brigids/Tay Lane, which presently provides pedestrian facilities only on its western side.

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Site Area: 0.473 Ha.

### **Description of Development**

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### **Development Statistics**

	SD22A/0342
<b>Total Units</b>	<b>58 Apartments</b>
<b>Unit Mix</b>	
<b>1-Bed</b>	23 (40%)
<b>2-Bed / 3-Person</b>	35 (60%)
<b>Total Units</b>	58
<b>Development</b>	
<b>Site Area</b>	0.47 Ha.
<b>Density</b>	123 D/Ha.
<b>Building Height</b>	1 & 4 Storeys
<b>Gross Floor Area</b>	3,635 sq.m
<b>Plot Ratio</b>	0.93
<b>Site Coverage</b>	30%
<b>Dual Aspect</b>	35% as per HQA
	70% as per Planning Report

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<b>Amenity Space</b>	
<b>Public Open Space</b>	907.4 Sqm Stated
<b>As % of Site</b>	19.3%
<b>Prospective Population (as per County Development Plan)</b>	87
<b>Ha. per 1,000 of Population</b>	10.4
<b>Communal Open Space</b>	1225.6
<b>Community Infrastructure</b>	
<b>Community Amenity</b>	86 sqm
<b>Parking</b>	
<b>Car Parking (Residents)</b>	27 Spaces
<b>Car Parking (Visitors)</b>	3 Spaces
<b>Bicycle Parking (Long-Stay)</b>	56 Spaces
<b>Bicycle Parking (Short-Stay)</b>	24 Spaces
<b>Parking Ratio</b>	
<b>Car Parking</b>	0.52
<b>Cycle Parking</b>	1.38

### **Zoning**

The site is subject to the 'RES' zoning objective, "To protect and/or improve residential amenity."

### **SEA Screening**

There is a registered monument on the site, a holy well (RMP Ref: DU021-03004).

The site overlaps with the following:

- Rathcoole registered monument (RMP ref: DU021-030 – villages);
- Casement Aerodrome approach surface and take-off surface, and inner horizontal surface;
- Casement Aerodrome significant noise and bird hazard areas; and
- Rathcoole Village ACA

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### **Consultations**

#### **Internal**

Roads	Requests Additional Information.
Housing	No objection, subject to conditions.
Public Realm	Requests Additional Information.
Water Services	Requests Additional Information.
Public Lighting	Recommends Measures.

#### **External**

Irish Water	No objection, subject to conditions.
Transport Infrastructure Ireland	No objection, subject to conditions.
Department of Defence	No objection, subject to conditions.

### **Submissions/Observations/Representations**

Third party observations and representations have been received from the Rathcoole Community Council and Cllr Eoin O'Broin. The issues raised are summarised below.

#### **Rathcoole Community Council**

- Supports backland/infill development
- Welcomes age-appropriate development
- Welcomes approach taken to appropriately conserve St. Brigid's Well
- Welcomes Cluid Housing association involvement.
- No additional multi-unit developments should be permitted until after Traffic Study for Rathcoole is completed.
- Permissions granted since 2022 exceed Rathcoole's total projected development for 2022 – 2028.
- Recent expansion of Rathcoole has taken place without expansion of infrastructure or transportation networks.
- No Aviation Impact Assessment.
- Noise Survey does not account for aviation-related noise.
- Noise Survey concentrates on noise internal to the scheme, does not provide for balconies.
- Upgrade of Tay Lane sewerage station is needed to cater for additional demand.
- No assessment as to whether the proposed development conforms with Cluid design guidelines.
- Not clear what level of assistance/care is intended.
- Design should conform with Universal Design Guidelines and the 'Building for Everyone' series.
- Lifts should be maintained and operational.
- Fire Risk Assessment does not discuss the needs of the mobility-impaired specifically.

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- Mobility Report is contradictory, with low parking proposed despite lack of public transport options.
- Nearby recent developments/decisions make for poor precedent and should not inform future design.
- Development should be reduced to 2 storeys.
- SDCC should produce a masterplan for a combined site with the site to the south, to include small retail, medical, community and business activities.

### Cllr Eoin O'Broin

- Noise from N7 is a major issue. The Noise survey concentrates on internal levels of noise, but balconies should be enclosed with retractable sliding doors/windows/blinds to allow people to use them without being exposed to the noise.
- Development is acceptable if the traffic impact will be low.
- Endorses comments of Rathcoole Community Council.

### Planning History

#### Subject Site

SD05A/0787: Permission **refused** by An Bord Pleanála (upholding a decision of SDCC) for demolition of existing derelict dwelling & construction of **52 no. units** in 2 no. new blocks - Block A consisting of 4 storey inclusive of penthouse (14 x 1 bed, 10 x 2 bed & 2 x 3 bed townhouses) & Block B consisting of 4 storey inclusive of penthouse (14 x 1 bed, 10 x 2 bed & 2 x 3 bed townhouses) with balconies, terraces & associated landscaping, 84 car-parking spaces accessed from parking granted as part of adjacent Eaton development & provision of bicycle parking, bin-stores & associated site works. A total of 48 apartments & 4 townhouses will be provided within landscaped open spaces & site works. The development is to be accessed via new vehicular entrance at Tay Lane.

Reasons for Refusal were:

1. It is considered that the scale and excessive density of development proposed on a constrained and restricted site would be inconsistent with the established pattern of development at this location and would represent an inappropriate form of development within a village setting. The proposed development would therefore contravene terms of the South Dublin County Development Plan in relation to infill development (S12.2.5i) and density (Section 11.7.VII), would seriously injure the amenity and depreciate the value of properties in the vicinity and be contrary to the proper planning and sustainable development of the area.
2. The proposed development would represent a substandard form of residential development by reason of the inadequacy of public and private open space, parking provision and unit size, and would give rise to undue overlooking and overshadowing of adjoining residential

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properties. The proposed development would therefore materially contravene the development standards of the South Dublin County Development Plan and the zoning objective namely 'To protect and/or improve residential amenity'.

3. Access and parking arrangements are considered substandard by reference to the requirements of the Planning Authority. The development would therefore interfere with the safety and capacity of the adjoining road network and be contrary to the proper planning and sustainable development of the area.

SD03A/0629: Permission **refused** by An Bord Pleanála (overturning a decision to grant permission by SDCC to grant permission) for residential development of **40 no. apartments** to comprise of: (1) Demolition of existing dwelling house and out buildings. (2) Construction of Block A, facing Tay Lane roadway, 2 & 3 storey pitched roofed building comprising 13 no. x 2 bed apts. and 1 no. x 1 bed apt. (3) Construction of Block B, facing the N7 roadway, 2, 3 & 4 storey mansard roofed building comprising 22 no. x 2 bed apartments and 4 no. x 1 bed apts. (4) Relocated entrance way at Tay Lane, access road through to adjoining lands to the east and south, 67 no. car park spaces and all associated site works. (5) A protected structure (St. Brigids Well) is located adjacent to the site of the proposed development.

S01A/0431: Permission **refused** by An Bord Pleanála (overturning a decision to grant permission by SDCC) for demolition of a dwelling and erection of a residential development of **35 no. units** to include (1) Block A - two storey building with roof penthouse level over, comprising ten apartments (2) Block B - two storey building with roof penthouse level over, comprising 25 apartments (3) re-located entranceway, car-parking, bin storage and all associated site works. A protected structure (St. Bridgids Well) is located on the site of the proposed development.

S00A/0412: Permission **refused** by An Bord Pleanála (upholding a decision of SDCC) for demolition of dwelling and erection of residential development of **40 no. units** to include: (1). Two storey pitched roof terraced block with roof level accommodation and dormers over, Comprising 7 no. houses. (2). 2 storey pitched roof block with roof penthouse level accommodation and dormers over and basement level parking, comprising 33 no. two bedroom apartments. (3). Relocated entrance way, car parking and all associated site works.

#### **At Glebe House (Protected Structure, RPS. 313), Main Street (Site to south)**

SD17A/0036: Permission **granted** by An Bord Pleanála (upholding a decision of SDCC) for a new **69 bedroom Aparthotel with reception, restaurant/coffee shop and bar on ground floor, function room on first floor, with 15 retail units and 4 market stalls.** Development would consist of demolition of some existing structures and the provision of new extensions to the protected structure, and 3 no. 3-storey guest wings. Site clearance works have taken place.

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SD05A/0400: Permission **granted** for demolition of single-storey structures attached to Glebe House & nearby single-storey shopping mall & assorted structures on a site surrounding the Glebe House: construction to consist of **39 no. apartments and 7 no. retails units** in 3 no. new blocks at 1, 2 and 3 storeys plus attic accommodation.

SD04A/0835: Application **withdrawn** regarding demolition of 2 chiefly single-storey structures attached to Glebe House, a freestanding single storey apartment, the nearby single-storey Shopping Mall & assorted non-residential structures within the yards of Glebe House: construction is to comprise **58 no. units and retail** in 3 no. blocks.

### **At St. Brigid's Cottage, Tay Lane (Site to north and west)**

SD99B/0233: Permission **refused** for Two storey dwelling - an extension to existing cottage.

### **Planning Enforcement History**

None.

### **Pre-Planning Consultation**

PP028/20: Attended by Fiona Redmond (Senior Planner) and Sarah Watson (Executive Planner) of the Planning Department as well as representatives from other departments. Noise, landscape design, tree survey, issues with Tay Pumping Station, Parking, Lighting, Conservation and Housing raised.

### **Relevant Policy**

#### **National Policy**

The relevant policy documents are detailed below. The Planning Authority are of the opinion that of most significant relevance is the National Planning Framework (NPF). In this regard, National Strategic Outcome 1 of the NPF refers to and, stresses the importance, of 'Compact Growth'. The NPF states,

‘From an urban development perspective, we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people.’

The NPF indicated that the delivery of compact growth will be through National Policy Objective 2a, which states,

‘A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.’

and National Policy Objective 3a, which states,

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‘Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.’

The National Planning Framework also includes a specific Chapter, No. 6, entitled ‘People, Homes, and Communities’. It includes 12 objectives among which Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages. Objective 33 seeks to prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

### **Other Ministerial Guidelines and Policy**

**Regional, Spatial & Economic Strategy 2020-2032 (RSES)**, Eastern & Midlands Regional Assembly (2019)

- Section 5 – Dublin Metropolitan Area Strategic Plan, in Regional, Spatial and Economic Strategy 2019 – 2031.

**Rebuilding Ireland: Action Plan for Housing and Homelessness**, Government of Ireland (2016).

**Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities**, Department of Housing, Planning and Local Government (2020).

**Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas**, Department of the Environment and Local Government (2009).

**Urban Design Manual**, Department of the Environment, Heritage, and Local Government, (2008).

**Urban Development and Building Heights Guidelines for Planning Authorities**, (2018)

**Quality Housing for Sustainable Communities-Best Practice Guidelines**, Department of the Environment, Heritage, and Local Government (2007).

**Design Manual for Urban Roads and Streets** Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2013).

**Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities**, Department of the Environment, Heritage, and Local Government, (2009).



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**The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).**

**Architectural Heritage Protection – Guidelines for Planning Authorities, Department of Arts, Heritage, and the Gaeltacht (2011).**

**The Framework and Principles for the Protection of Archaeological Heritage, Department of Arts, Heritage, Gaeltacht, and the Islands (1999)**

**National Disability Inclusion Strategy, Government of Ireland, 2017, Dublin Local Authorities, 2018.**

**Housing Options for our Ageing Population, Department of Housing, Planning & Local Government and Department of Health (2019).**

**Dublin Agglomeration Environmental Noise Action Plan, 2018 – 2035,**

**Departmental Circulars, Department of Housing, Planning and Local Government (2020) – as listed:**

- PL02/2020: Covid-19 Measures
- PL03/2020: Planning Time Periods
- PL04/2020: Event Licensing
- PL05/2020: Planning Time Periods
- PL06/2020: Working Hours Planning Conditions
- PL07/2020: Public Access to Scanned Documents
- PL08/2020: Vacant Site Levy
- Circular NRUP 02/2021 - Residential Densities in Towns and Villages

**Circular Letter NRUP 03/2021 – s.28 Guidelines on the Regulation of Institutional Investment in Housing**

Non-Governmental Policy Documents of Relevance

**Building for Everyone: A Universal Design Approach, National Disability Authority.**

**Age Friendly Principles and Guidelines for Planning Authorities, Age Friendly Ireland, 2021.**

**Housing for Older People – Thinking Ahead, Housing Agency, 2016.**

**ProPG Planning and Noise: Professional Practice Guidance on Planning and Noise.’ UK Chartered Institute of Environmental Health**

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### **South Dublin County Development Plan 2022 – 2028**

Chapter 2 Core Strategy and Settlement Strategy

Policy CS1 Strategic Development Areas

Section 2.6 Total Land Capacity within Strategic Development Areas

Table 2.8 Total Land Capacity within Strategic Development Areas

Table 2.9 Capacity of undeveloped lands within South Dublin

Policy CS5 Lands for Employment

Section 2.7 Settlement Strategy

Policy CS6 Settlement Strategies – Strategic Planning Principles

Section 2.7.1 Dublin City and Suburbs

Section 2.7.1: Tallaght

Policy CS7 Promote the consolidation and sustainable intensification of development within the Dublin City and Suburban settlement boundary.

Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town

“Rathcoole has limited public transport provision and social services to date. Some improvements will be made as BusConnects brings improved services and overall accessibility to Celbridge, Dublin City Centre, Grangecastle, Hazelhatch train station and Saggart Luas Stop. It is important that Rathcoole develops at an incremental pace, based on the delivery of social, physical and transport infrastructure and services. The capacity of zoned lands is considered to be sufficient to meet long term demand for the settlement.”

Policy CS10 Rathcoole

Chapter 3 Natural, Cultural and Built Heritage

Policy NCBH1 Overarching

Policy NCBH2 Biodiversity

Policy NCBH5 Protection of habitats and species outside of designated areas.

Section 3.4.2 Archaeology

Policy NCBH13 Archaeological Heritage

Section 3.5.2 Protected Structures

Policy NCBH19 Protected Structures

NCBH19 Special Local Objective 3: “To protect Glebe House RPS Ref. 313 (Former Mary Mercer Trust Charter School for Girls), Rathcoole”

Section 3.5.3 Architectural Conservation Areas

1. Rathcoole Village

Policy NCBH20 Architectural Conservation Areas

Policy NCBH21 Vernacular / Traditional and Older Buildings, Estates and Streetscapes

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Policy NCBH22 Features of Interest

Section 3.6 Architectural Conservation, Adaptability and Placemaking

Policy NCBH23 Architectural Conservation and Design

NCBH23 Objective 3

NCBH Objective 4

NCBH23 Objective 7

Policy NCBH24 Adapting and Reusing Historic Buildings

Policy NCBH25: Placemaking and the Historic Built Environment

NCBH25 Objective 3: To support certain appropriate backland development in villages

Policy NCBH26: Climate Change, Adaptation and Energy Efficiency in Tradition and Historic Buildings

Chapter 4 Green Infrastructure

Policy GI1 Overarching

GI1 Objective 4

To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial, and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage, and enhance GI resources providing links to local and countywide GI networks.

Policy GI2 Biodiversity

Strengthen the existing Green Infrastructure (GI) network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the Eastern and Midlands Region Spatial and Economic Strategy (RSES).

Policy GI3 Objective 4

To uncover existing culverts where appropriate and in accordance with relevant river catchment proposals to restore the watercourse to acceptable ecological standards for biodiversity wherever possible improving habitat connection and strengthening the County's GI network.

Policy GI4 Sustainable Drainage Systems

Require the provision of Sustainable Drainage Systems (SuDS) in the County and maximise the amenity and biodiversity value of these systems.

GI4 Objective 3:

To require multifunctional open space provision within new developments to include provision for ecology and sustainable water management.

GI4 Objective 4:

To require that all SuDS measures are completed to a taking in charge standard.

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Section 4.3.1 Components of the GI Network

Figure 4.4. Green Infrastructure Strategy Map

Chapter 5 Quality Design and Healthy Placemaking

Policy QDP1 Successful and Sustainable Neighbourhoods

Policy QDP2 Overarching – Successful and Sustainable Neighbourhoods

Policy QDP3 Neighbourhood Context

QDP3 Objective 2: special character of villages

QDP3 Objective 3: design standards and context in villages

QDP3 Objective 5: appropriate height in villages

Policy QDP4 Healthy Placemaking

Policy QDP5 Connected Neighbourhoods

Policy QDP6 Public Realm

QDP6 Objective 2: public realm improvements in villages (SDCC initiatives)

QDP6 Objective 3: public realm improvements in villages

Policy QDP7 High Quality Design

Policy QDP8 High Quality Design – Building Height and Density

Policy QDP8 Objective 2

Policy QDP9 High Quality Design - Building Height and Density

Policy QDP10 Mix of Dwelling Types

Chapter 6 Housing

Policy H1 Housing Strategy and Interim Housing Need and Demand Assessment

Section 6.3.1 Housing for Older People

Section 6.3.2 Housing for Persons with Disabilities and/or Mental Health Issues

Policy H3 Housing for All

Support the provision of accommodation for older people and people with disabilities and / or mental health issues within established residential and mixed use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.

Policy H7 Residential Design and Layout

Policy H8 Public Open Space

Policy H9 Private and Semi-Private Open Space

Policy H10 Internal Residential Accommodation

Chapter 7 Transport and Movement

Policy SM1 Overarching – Transport and Movement

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Table 1 7.1 Cycle South Dublin Routes and Projects

Policy SM2 Walking and Cycling

SM2 Objective 12: Signage in villages

SM2 Objective 17: Cycling facilities in villages

Policy SM3 Public Transport – General

Policy SM3 Public Transport – Bus

Policy SM3 Public Transport – Rail, Transport Interchange and Park and Ride

Table 7.5 Six Year Road Plan

Policy SM5 Street and Road Design

Section 7.9 Transport Studies and Traffic Management

Policy SM6 Traffic and Transport Management

SM6 SLO 1: To carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement.

Policy SM7 Car Parking and EV Charging

SM7 Objective 7: Nature of parking and parking restrictions in village centres

Chapter 8 Community Infrastructure & Open Space

Policy COS1 Social Inclusion and Community Development

Section 8.4.1 Social / Community Infrastructure Audit

Section 8.4.3 Universally Accessible Social / Community Facilities

Policy COS2 Social / Community Infrastructure

Policy COS5 Parks and Public Open Space – Overarching

Section 8.7.3 Quantity of Public Open Space

Policy COS7 Childcare Facilities

Policy COS8 Primary and Post Primary Schools

COS8 SLO1: To identify a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest / Saggart / Rathcoole / Newcastle to provide for the needs identified for the catchment area by the Department of Education.

Policy COS10 Libraries

COS10 Objective 2: Support a new library in the Rathcoole environs

Chapter 10 Energy

Policy E3 Energy Performance in Existing and New Buildings

Policy E4 Electric Vehicles

Policy E5 Low Carbon District Heating Networks

Chapter 11 Infrastructure and Environmental Services

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Section 11.8 Airports and Aerodromes  
Policy IE8 Environmental Quality  
Policy IE9 Casement Aerodrome  
Policy IE13 Noise

Chapter 12 Implementation and Monitoring  
Section 12.3.5 Landscape Character Assessment  
Rathcoole – Historic Urban landscape type

#### **Assessment**

The main issues for consideration are:

- Principle of Development
  - o Zoning and council policy
  - o Settlement Policy
  - o Residential Density, Land Use and Transport
- Residential Amenity and Housing for Older People
  - o Unit size
  - o Unit Layout and Age-friendly design
  - o Unit Mix
  - o Aspect
  - o Housing for Older People
  - o Universal / Accessible Design
  - o Social Housing / Part V
- Quality Design and Healthy Placemaking
  - o Noise
  - o Design and Layout
  - o Building Height and Scale
  - o Daylight and Sunlight Analysis
- Heritage: Archaeology
- Open Space, Green Infrastructure, and Natural Heritage
  - o Trees
  - o Green Infrastructure
  - o Culvert / diversion of stream
  - o Ecology
  - o Provision of public open space
- Sustainable Movement
  - o Traffic
  - o Car Parking
  - o Pedestrian Facilities

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- Pedestrian Permeability
- Drainage
  - Irish Water
  - Water Services
  - Culvert / diversion of stream
- Public lighting
- Aviation
- Taking in Charge
- Screening for Environmental Impact Assessment
- Screening for Appropriate Assessment

### Principle of Development

#### Zoning and Land-Use Policy

The site is subject to the 'RES' land-use objective, "to improve and/or protect residential amenity." The proposed use is 'housing for older people' and is permitted in principle under this zoning, subject to all other relevant policies and the impact on adjoining residential properties.

#### Settlement Policy

The South Dublin County Development Plan 2022 – 2028 commits South Dublin County Council to undertaking a Traffic Study in Rathcoole during the lifetime of the plan. The County Development Plan also advises that residential development in the area should be provided in tandem with appropriate amenities. The Plan also supports infill development in the village core.

The proposed development is for residential development for older people only, on a site which currently accommodates an office within the protected structure. The units are located in the 'RES' zoned area. The site immediately to the south is to be redeveloped under an existing permission – under which some works have already taken place – and which shall include additional retail and other services.

The delivery of 58 apartments at this location may be acceptable subject to a favourable assessment of its impact on traffic and other services in the village and an assessment of issues relating to overdevelopment. This is dealt with in other sections of the report.

#### Residential Density, Land Use and Transport

The proposed residential density is **128 dwellings / ha**. This would be an appropriate density for a 'central and/or accessible location' as per the government's most recent density guidance, contained in 'Sustainable Urban Housing: Design Standards for New Apartments' (2020). This is considered to be a high density for a site located in Rathcoole village, given the sustainable transport options and level of local services available. The County Development Plan encourages the siting of housing for

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older people close to service centres; however, the overall density at the site, and the particular type of housing for older people sought, indicates that the development would significantly impact the surrounding roads network (as per Roads Department report). Due to lack of sustainable options, higher levels of car parking are recommended by the Roads Department; the proposed surface level car park already would occupy approximately a third of the site, and pedestrian facilities are non-intuitive on the site, and severely lacking on Tay Lane. Overall, **there are a number of indicators of overdevelopment in the proposal, and a reduction in scale would be appropriate.** The applicant can advance this by way of **additional information.**

### Residential Amenity and Housing for Older People

#### Unit Size

The proposed units each comply with requirements under the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020) for minimum floor area, and sufficient numbers of units are sized at 110% or higher of minimum sizes, to comply with section 3.18 'Safeguarding Higher Standards', of those guidelines.

#### Unit Layout and Age-friendly design

With regard to storage space, living area space or any other measures contained in the guidelines, the submitted documentation is deficient. The applicant identifies unit types A, B, and C, and several variations thereof (A1, A2, etc.); however, no unit type plans are provided and the 1:200 site plans provided are not of sufficient detail to show:

- internal dimensions
- storage areas
- dimensions and area of balconies.

The applicant's Design Statement does contain 'typical apartment layout' drawings for a 1-bed unit and a 2-bed / 3-person unit. These do not appear to adhere to the proposed units. They do not show how the units are universally accessible.

The notes in the Design Statement explaining the age-friendly design do not appear to be of material significance. They are (1) consideration has been had for universal design and the Cluid design handbook (this is not a statement of compliance), and (2), bathrooms have been suitably located for adaptation in approx. 40% of units, being located adjacent to the bathroom – yet the bathrooms in the 'typical apartment layout' drawings do not appear large enough to accommodate either wheelchair access or a second entrance.

The applicant should provide detailed unit layout plans by way of **additional information**, and these should highlight and show that the units are appropriately accessible and show how 'ageing in place' measures such as adaptations of bathrooms can be realised.



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#### Unit Mix

The proposed development does not comply with some general measures provided for in the Apartment Guidelines and the County Development Plan. 2-bed / 3-person units make up 65% of the development, above the 10% maximum provided for in the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020). The lack of 3-bed units is not in keeping with the general policy of providing a minimum of 30% of units under Policy H1 Objective 12.

There is a logic to the apparent over-provision of 2-bed 3-person units in the context of age-friendly accommodation, subject to the development being occupied by the target class of occupant. The proposed development would otherwise not be in compliance with the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020).

The under provision of 3-bed units can likewise be understood in the context of housing for older people. Policy H1 Objective 12 allows such where it can be demonstrated that:

1. there are unique site constraints that would prevent such provision; or
2. that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or
3. the scheme is a social and / or affordable housing scheme.

It is considered that criteria (2) would be met subject to an appropriate restriction on occupancy.

The applicant should comment in their **additional information** response on the justification of unit mix and a potential restriction on occupancy (this is explored further in this section, under the 'Housing for Older People' heading).

#### Aspect

The applicant's design statement and Planning Report state that 70% of the units are dual aspect. The floor plans show that some units are technically, but not materially, dual aspect. The Planning Authority estimates the development to have approx. 38% dual aspect units. This is an infill site and does have some constraints; nonetheless this is an issue upon which the development can be improved. The applicant should consider this via **additional information**.

#### Housing for Older People

The South Dublin County Development Plan 2022 – 2028 supports the provision of housing for older people, in support of universal and appropriate provision of housing, and as a means to provide opportunities for 'right-sizing', i.e., the making available of family-sized homes to younger families.

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Policy H3 of the Plan provides a few criteria for such housing:

- At locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.
- To actively encourage and directly support the provision of specific purpose built accommodation, including assisted living units and lifetime housing and adaptation of existing properties as a matter of urgency.
- promote 'aging in place' and opportunities for right sizing within communities.
- support and facilitate the implementation of the South Dublin Age Friendly Strategy 2020-2024, the National Age Friendly Programme, and Housing Options for Our Ageing Population 2019 and having regard to Age Friendly Ireland's guidelines for Planning Authorities (2021).

The applicant has indicated that the development would be 'stage 3' housing under the 'Thinking Ahead' (2016) taxonomy of housing and care needs. This indicates housing for the regular market with no on-site services. Such housing is **not** tailored to on-site care and is aimed at allowing older people to downsize without needing to transition to acute care facilities such as nursing homes.

The proposal as presented provides no actual restriction on the class of occupant that can use the development. As noted elsewhere in this report, the proposed unit mix would be contrary to national guidance and the County Development Plan and would only be acceptable to the Planning Authority if occupancy is restricted, to ensure its use for the stated purpose of development. Sections 39 (2) and 47 of the Planning and Development Act provide for agreements for the restriction of use of developments to a certain class of occupant.

The development should be restricted to older persons as primary occupants. The applicant should comment on this as part of their **additional information** response and propose a condition of permission that might effect such a restriction.

### Universal and Accessible Design

The applicant has not shown in their Design Statement or Planning Report, that the development would accord with the 'Building for Everyone' design guidelines produced by the National Disability Authority and referenced in the County Development Plan. It is considered appropriate that the applicant provide a statement of compliance with these guidelines as **additional information**.

### Social Housing / Part V

The Housing Department has stated that its preference is to acquire units on-site and that an agreement condition should be applied in the event of a grant of permission. The report also states that at least 4 no. wheelchair accessible units should be provided.

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### **Quality Design and Healthy Placemaking**

#### Noise

The proposed development is located in very close proximity to the N7, a national road of significant capacity and design speed, and a major route through the county and to/from the city. The development is also located within the approach area to Casement Aerodrome and the Department of Defence has advised of the likely acoustic impact of flight operations in this location. The Dublin Agglomeration Environmental Noise Action Plan 2018 – 2035 (DAENAP) estimates the noise levels at or immediately adjacent to the national road range from 65 dB to >75 dB during daytime.

The site is zoned for residential development and there is ample residential development in situ in Rathcoole village. The land-use zoning objectives therefore support the provision of residential development at this site. On the other hand, the County Development Plan seeks that national and European noise legislation is applied to reduce the effect of noise pollution on human health. The concrete policy in this regard is as follows:

Policy IE8 reads: “Seek to take appropriate steps to reduce the effects of air, noise and light pollution on environmental quality and residential amenity in line with European, National and Regional policy and legislation.”

Objective 4 seeks the implementation of the ‘relevant spatial planning recommendations and actions’ of the DAENAP. This plan contains an appendix specific to SDCC, which encourages that sites are designed to mitigate or minimise noise impact.

IE8 Objective 7 reads, “To ensure that noise sensitive development in proximity to national and other roads provides a noise impact assessment and includes appropriate mitigation measures, such as noise barriers, set back landscaping and / or buffer zones between areas of land where development is proposed and existing and proposed national and other roads.”

The Noise Impact Statement provided by the applicant measures and provided mitigation solutions for internal noise levels within the development. The statement does not provide solutions for use of balconies or the communal open space. The proposed development lacks mitigation measures such as noise barriers, set back landscaping and / or buffer zones from the national road. Balconies, particularly at higher levels, would be significantly affected by the noise. The northern façade of the proposed development would be closer to the N7 road than any comparable development of 4 storeys in Rathcoole.

The design could be improved with greater buffering, with use of berms topped by hedgerows and trees; or by orienting the building such that it creates a noise barrier, with balconies and open space located to the south, and an insensitive use such as car parking located to the north, such as in the Eaton Square development to the east; or with the use of ‘winter garden’ balconies.

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The site is constrained due to its size and irregular shape. Expansion into the site to the north and west, or otherwise provision of a smaller development, would facilitate some of the above options for mitigating noise.

The applicant should respond to the above by way of **additional information**.

### Design and Layout

The general layout of the site provides for a car park to the south-west, the building to the east, and communal open space to the west of the northern wing of the building. The layout is considered to be unintuitive in terms of pedestrian access facilities through the car park and could be improved in this manner. In terms of public open space, the applicant's claims to provide 19% of the site as public open space are untenable, as the areas identified are linear circulation areas in the main, which in any event would neither read as public, nor are proposed to be taken in charge. The site layout does not take cues from adjoining sites, nor provide its own solutions, to reduce noise impact on the open space or balconies, particularly at higher levels. Each of these factors is explored elsewhere in this report.

### Building Height and Scale

The proposed height of 4 storeys is equivalent to that of the adjoining development to the east and can be considered acceptable given that context. The permitted development to the south will be 3 storeys in height. It is considered that, given the details of the permitted development to the south, and the existing heights to the east, the building height and siting would not result in loss of privacy or overbearing impact to those sites.

### Daylight and Sunlight Analysis

The applicant has provided analysis of Average Daylight Factor (ADF) and sunlight access. Some rooms do not meet the appropriate ADF but do receive more than 2 hours of sunlight on March 21<sup>st</sup>. There is some ambiguity as to the appropriate standards to apply in relation to daylight and sunlight.

The report provided shows that a large proportion of the floor space within the proposed units would not obtain 2 hours of sunlight on 21<sup>st</sup> March. While it is not clear why 2 hours of sunlight has been assessed against rooms – this is a standard generally applied to open spaces – the plans do illustrate a weakness of the design, with many rooms having poor sunlight access for most of their floor space. The appropriate measures to assess the design by in this regard are 'No Sky Line' and 'Target Illuminance'. The applicant should provide a supplementary daylight and sunlight analysis assessing the habitable rooms of the development against these standards (contained in BS 209 and BS EN 17037:2021), as **additional information**.

The supplementary analysis report should also take account of the permitted structures under SD17A/0036, in particular the building due east of the southern wing of the proposed development.

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### **Heritage: Archaeology**

A holy well is located on the site. Additionally, all of Rathcoole village is listed as an area of archaeological potential. The applicant has proposed to leave the site of the holy well undisturbed, with soft landscaping located above. This is considered to be appropriate, subject to appropriate conditions for archaeological surveying, recording and reporting, in the event of a grant of permission.

### **Open Space, Green Infrastructure and Natural Heritage**

The Public Realm Department has provided a report with comments on trees & arboricultural impact, ecological impact, SUDs and green infrastructure, and planting proposals. The reports seeks additional information in relation to landscape plans, an arboricultural method statement, and a SUDs Management Plan.

### Trees

The Public Realm report seeks a full suite of arboricultural reports and drawings. It is noted from further consultation that the extensive tree loss on the site (42 trees) is unlikely to have a major biodiversity impact on the site, due to the species of tree present. Additional documentation in relation to tree protection measures should be sought by way of **additional information**.

### Green Infrastructure

The applicant has provided a Green Space Factor calculation worksheet which shows them hitting the minimum pass score for a 'RES' zoned site of 0.5. This is acceptable.

### Culvert / diversion of stream

It is noted that a stream running up the west of the site has been culverted and diverted through an underground pipe. This stream is to be uncovered as part of permitted development SD17A/0036. It is council policy to uncover culverts as per Policy GI3 Objective 4 of the County Development Plan, and section 12.4.3. The applicant should be requested to revise their landscape and drainage plans in order to uncover this water feature, by way of **additional information**.

### Ecology

The Public Realm Department has assessed the Ecological Impact Assessment Report and accepts its findings, subject to the implementation of mitigation measures as part of the development. The report conclusion itself also mentions mitigation measures, though none are detailed in the body of the report.

It is considered from the report that standard mitigation measures relating to careful removal of trees and other features, to avoid destruction of birds, bats, or their habitats, should be undertaken during the construction stage.

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### Provision of Public Open Space

The applicant has stated that they are providing 19% of the site area as public open space. The Landscape Design Report shows this to consist of the pedestrian path and surrounding verges / spaces between the western and eastern pedestrian accesses, and around the southern wing of the proposed building. This is linear incidental space and does not fit the qualitative requirements of public open space under the County Development Plan.

Under Policy COS5, the applicant is required to provide:

- 10% of the site area as public open space,
- 2.4 Ha. per 1,000 of population, or otherwise provide for the acquisition or improvement of nearby public open space as agreed with the Public Realm Department (for a population of 87 people, this equates to 0.2088 Ha.) or a development contribution in-lieu;

In the absence of an enabling Development Contribution Scheme, the planning authority is not currently seeking development contributions in lieu of public open space where its requirement under Policy COS5 exceeds 10% of the site area. However, the minimum requirement of 10% of the site area for public open space remains and this is supplemental to the requirements for communal open space.

The applicant is requested to show by way of **additional information**, how they intend to provide 10% of the site area for public open space to the qualitative standard set out in the CDP.

### **Sustainable Movement**

The Roads Department has sought additional information in relation to:

- car parking provision (seeks more);
- Undertake a Traffic and Transport Assessment;
- Stage 1 Road Safety Audit;
- Provide a dedicated 2m footpath along the eastern side of Tay Lane between the site and Main Street.

### Traffic Impact

The Roads Department report states this with regard to traffic impact:

“...this area has congested traffic issue owing to a single main street and limited access to the surrounding roads network. The addition of 58no. apartments to this area would significantly impact the surrounding roads network. A traffic analysis has been conducted and contends that the development will have a very little impact on the peak flows of the main street. These figures are assumed based on the width of the main street and the road

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type. The roads department would contend that the peak traffic flows on the Rathcoole main Street are not reflective within this report. Therefore, the applicant should substantiate the traffic flows by conducting a survey of the traffic at the surrounding roads network.”

The County Development Plan commits the Planning Authority to carrying out a Traffic Study of Rathcoole over the lifetime of the Plan. This has not yet occurred. Both third party observations have raised the issue of traffic in Rathcoole. The Roads Department commentary accords with that of Rathcoole Community Council in questioning the rationale of the applicant that the location of the development would encourage use of bus and luas transport modes.

The Roads Department recommendation is accepted, and it is appropriate that the development subjected to a traffic and transport assessment.

### Car Parking

The Roads Department has sought an increase of car parking provision from 30 to 37 units. This would represent a car parking ratio of 0.65 spaces per unit and would still be on the lower end given the accessibility of Rathcoole village.

As noted elsewhere in this report, the car parking area already takes up a notable proportion of the site as it is all provided at surface level. Rather than increasing car parking provision, the applicant should consider a **reduction in units**.

### Pedestrian Facilities

The pedestrian access to the site from Tay Lane is located north of the car park. It is considered likely that pedestrians would simply walk through the car park. The car park should be reconfigured to make some provision along the south of the site for pedestrians, whether it is demarcated and raised footpath through the car park, or a footpath south of the parked cars. The applicant should respond to this by way of **additional information**.

### Pedestrian Permeability

The applicant proposes to provide east-west permeability through the site with a pedestrian access onto Eaton Green. This is encouraged and would contribute generally to a permeable village centre with good pedestrian links. The proposed pedestrian access to the east would open onto an area which may be in private ownership and has not been taken in charge (though the street has been). The applicant should be encouraged to liaise with the Management Company or owner of the Eaton Development and report back via **additional information**.

### **Drainage**

#### Irish Water

The Irish Water report states no objection subject to standard conditions. The applicant's own correspondence with Irish Water shows that a foul sewer connection on the site will be facilitated in

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Q1 2026 at the earliest. This is acceptable subject to a condition that services must be connected prior to occupation.

#### Water Services

The SDCC Water Services report seeks additional information on the following basis:

“1.1 Soakaways are not allowed for apartments because soakaways must be individually owned and not shared. Remove proposed soakaway.

1.2 In exceptional circumstances underground attenuation systems are permitted but only if there is insufficient attenuation provided by SuDS (Sustainable Drainage Systems)

1.3 The applicant is to submit a drawing and report showing a flow route analysis of existing site. The development of the surface water flow routes throughout the site should correlate as closely as possible to the natural flow of surface water on site.

1.4 Submit a drawing showing all SuDS systems in plan and cross sectional view. Show the treatment train and conveyance of surface water above ground over the site. Show the capacity in m<sup>3</sup> of proposed SuDS systems.

**1.1** The use of concrete attenuation tanks is heavily discouraged by SDCC Drainage section. The applicant is required to submit a drawing and report providing alternative means of attenuating surface water through the use of Sustainable Urban Drainage Systems features. SuDs features could include but are not limited to:

- Green Roofs
- Blue Roofs
- Swale
  
- Treepits
- Grasscrete
- Raingardens Biodiversity areas
- Detention basins
- Green areas
- Other such SuDS

**1.2** The applicant is required to submit a drawing and report which give greater detail regarding the attenuation capacity provided on site. Details required will include the proposed attenuation capacity provided by drainage features given in units of m<sup>3</sup>.”



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Point 1.1 of the report can be disregarded as the development will be under the control of an Owner's Management Company or another appropriate body (Cluid Housing is proposed). Otherwise, the issues raised in the report can be put to the applicant as part of the request for **additional information**.

### Culvert / diversion of stream

In addition to the above, the stream on-site should be uncovered and integrated into the Landscape Plans, and this should be reflected in revised drainage plans as well.

### **Aviation**

The Department of Defence has suggested conditions in relation to crane operations and control of birds. These are considered appropriate. The department's submission also notes the likely acoustic impact of flight operations at Casement Aerodrome. The applicant should supplement their Noise Impact Assessment and resulting recommendations to take account of noise arising from aviation. This can be considered under **additional information**.

### **Public Lighting**

The SDCC Public Lighting Department has recommended that additional public lighting is required in Tay Lane to ensure safety for pedestrians. The report states:

“The existing public lighting provision on St. Brigids-Tay Lane is insufficient and has been subject to many resident complaints in recent years, particularly by the Women's Refuge where there are often security concerns. The narrow footpaths and presence of ESB columns hosting distribution lines have limited the scope for improvement to the Public Lighting. The existing Public Lighting on St.Brigid's- Tay Lane would be insufficient to provide adequate light to the increased pedestrian and vehicular traffic under the proposed development. Undergrounding of 2 spans of the ESBN overhead distribution lines and the provision of a fully underground Public Lighting installation should be considered under this proposed development.”

The applicant should respond to the above by way of **additional information**.

### **Taking in Charge**

The applicant should clarify as to whether it is proposed to have any of the site taken in charge. They can do so by way of **additional information**.

### **Screening for Environmental Impact Assessment**

Having regard to the modest nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

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#### Screening for Appropriate Assessment

Having regard to:

- Nature and scale of the works;
- Location of the works within a modified landscape and relative to any designated site;
- Lack of any hydrological connectivity to any aquatic receptors that link to a European site;

It is considered that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on the Natura 2000 network and appropriate assessment is not therefore required.

#### Conclusion

The proposed development accords with the 'RES' land-use zoning objective and other objectives relating to housing for older people. There are a number of issues with the proposed design, including but not limited to potential overdevelopment, noise, and impacts on traffic. The applicant should be requested to provide additional information.

**Recommendation:** Request further information

I recommend that **ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. Occupancy Restriction and Unit Mix.
  - (a) The proposal as presented provides no restriction on the class of occupant that can use the development. As noted elsewhere in the Planner's Report, the proposed unit mix ( 65% 2-bed,m 3-person units and no 3-bed units) would be contrary to national guidance and the County Development Plan, and would only be acceptable to the Planning Authority if occupancy were restricted, to ensure its use for the stated purpose of development. Sections 39 (2) and 47 of the Planning and Development Act 2000 as amended, provide for agreements for the restriction of use of developments to a certain class of occupant. The development should be restricted to older persons as primary occupants. The applicant is invited to propose the wording of a condition of permission that might effect such a restriction, in order to support the provision of housing for older people.
  - (b) The applican may otherwise provide a rationale for the proposed unit mix in the context of council policy to achieve more than 30% of 3-bed units and national guidance to provide no more than 10% 2-bed / 3-person units.
2. Unit Floor Plans.

The applicant's Design Statement does contain 'typical apartment layout' drawings for a 1-bed unit and a 2-bed / 3-person unit. These do not appear to adhere to the proposed units, nor do they do not show how the units are universally accessible, or how layouts

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could be revised as part of 'ageing in place' adaptations. The applicant should provide detailed unit layout plans by way of additional information, and these should highlight and show that the units are appropriately accessible and show how 'ageing in place' measures such as adaptations of bathrooms can be realised.

3. Overdevelopment.

The applicant is requested to reduce the overall provision of units in the development in order to achieve a car parking ratio of 0.65 spaces per unit, without increasing car parking levels above that proposed.

4. Noise.

(a) The Noise Impact Statement provided by the applicant measures and provides mitigation solutions for internal noise levels within the development. The statement does not provide solutions for use of balconies or the communal open space. The proposed development lacks mitigation measures such as noise barriers, set back landscaping and / or buffer zones from the national road. Balconies, particularly at higher levels, would be significantly affected by the noise. The northern façade of the proposed development would be closer to the N7 road than any comparable development of 4 storeys in Rathcoole. The design could be improved with greater buffering, with use of berms topped by hedgerows and trees; or by orienting the building such that it creates a noise barrier, with balconies and open space located to the south, and an insensitive use such as car parking located to the north., such as in the Eaton Square development to the east; or with the use of 'winter garden' balconies. The site is constrained due to its size and irregular shape. Expansion into the site to the north and west, or otherwise provision of a smaller development, would facilitate some of the above options for mitigating noise.

The applicant should respond to the above by way of additional information, and in particular show how the scheme would comply with Policy IE8 Objectives 4 and 7.

(b) The applicant should supplement their Noise Impact Assessment and resulting recommendations to take account of noise arising from aviation.

5. Roads.

The applicant is requested to submit:

(a) a Traffic and Transport assessment of the nearby junctions, to confirm that the development will have no impact on the traffic flows on the Rathcoole main street.

(b) a stage 1 road safety audit, with particular focus on the pedestrian access to the west and east of the development.

(c) a revised layout of not less than 1:200 scale, showing a dedicated 2.0m wide footpath on the east side of Tay Lane from the Rathcoole main street to the access of the proposed development.

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6. Aspect.

The proposed development is considered by the Planning Authority to contain 22 no. double aspect units (Unit Nos. 3, 4, 10, 11, 14, 17, 18, 24, 25, 28, 31, 32, 35, 39, 40, 43, 54, 55, and 58), amounting to 38% of the proposed units. The applicant is requested to consider improving the design and layout in this respect to provide a higher proportion of double aspect units.

7. Universal and Accessible Design.

The applicant has not shown in their Design Statement or Planning Report, that the development would accord with the 'Building for Everyone' design guidelines produced by the National Disability Authority and referenced in the County Development Plan. It is considered appropriate that the applicant provide a statement of compliance with these guidelines as additional information.

8. Daylight and Sunlight.

(a) The report provided shows that a large proportion of the floor space within the proposed units would not obtain 2 hours of sunlight on 21st March. While it is not clear why 2 hours of sunlight has been assessed against rooms – this is a standard generally applied to open spaces – the plans do illustrate a weakness of the design, with many rooms having poor sunlight access for most of their floor space. The appropriate measures to assess the design by in this regard are 'No Sky Line' and 'Target Illuminance'. The applicant should provide a supplementary daylight and sunlight analysis assessing the habitable rooms of the development against these standards (contained in BS 209 and BS EN 17037:2021), as additional information.

(b) The supplementary analysis report should also take account of the permitted structures under SD17A/0036, in particular the building due east of the southern wing of the proposed development.

9. Watercourse.

It is noted that a stream running up the west of the site has been culverted and diverted through an underground pipe. This stream is to be uncovered as part of permitted development SD17A/0036. It is council policy to uncover culverts as per Policy GI3 Objective 4 of the County Development Plan, and section 12.4.3. The applicant is requested to revise their landscape and drainage plans in order to uncover this watercourse and integrate it into the landscape proposals.

10. Public Open Space.

The proposed public open space consists of the pedestrian path and surrounding verges / spaces between the western and eastern pedestrian accesses, and around the southern wing of the proposed building. This is linear incidental space and does not fit the qualitative requirements of public open space under the County Development Plan. The applicant is

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requested to provide additional information specifying how 10% of the site area will be provided as Public Open Space to the qualitative standards set out in the CDP and on top of the requirements for Communal Open Space.

### 11. Pedestrian Facilities.

(a) The pedestrian access to the site from Tay Lane is located north of the car park. It is considered likely that pedestrians would simply walk through the car park. The car park should be reconfigured to make some provision along the south of the site for pedestrians, whether it is demarcated and raised footpath through the car park, or a footpath south of the parked cars.

(b) The proposed east-west permeability through the site with a pedestrian access onto Eaton Green is encouraged and would contribute generally to a permeable village centre with good pedestrian links. The proposed pedestrian access to the east would open onto an area which may be in private ownership, and has not been taken in charge (though the street itself has been). The applicant should be encouraged to liaise with the Management Company or owner of the Eaton Development and report on progress towards consent for the opening at this location.

### 12. Surface Water.

The applicant is requested to submit:

(a) a drawing and report showing a flow route analysis of existing site. The development of the surface water flow routes throughout the site should correlate as closely as possible to the natural flow of surface water on site.

(b) a drawing showing all SuDS systems in plan and cross sectional view. Show the treatment train and conveyance of surface water above ground over the site. Show the capacity in m<sup>3</sup> of proposed SuDS systems. In exceptional circumstances underground attenuation systems are permitted but only if there is insufficient attenuation provided by SuDS (Sustainable Drainage Systems)

(c) 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) a drawing and report which give greater detail regarding the attenuation capacity provided on site. Details required will include the proposed attenuation capacity provided by drainage features given in units of m<sup>3</sup>.

### 13. Public Lighting and Undergrounding of Services.

The SDCC Public Lighting Department has recommended that additional public lighting is required in Tay Lane to ensure safety for pedestrians. The report states:

The existing public lighting provision on St. Brigids-Tay Lane is insufficient and has been subject to many resident complaints in recent years, particularly by the Women's Refuge

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where there are often security concerns.. The narrow footpaths and presence of ESB columns hosting distribution lines have limited the scope for improvement to the Public Lighting. The existing Public Lighting on St.Brigid's- Tay Lane would be insufficient to provide adequate light to the increased pedestrian and vehicular traffic under the proposed development. Undergrounding of 2 spans of the ESB overhead distribution lines and the provision of a fully underground Public Lighting installation should be considered under this proposed development.'

The applicant should respond to the above by way of additional information.

### 14. Taking in Charge.

The applicant should clarify as to whether it is proposed to have any of the site taken in charge.

### 15. Public Realm - Landscape Plan.

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The applicant shall provide the following additional information:

- i. The applicant is requested to submit 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.
- iii. The landscape Plan should 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. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
- v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

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### 16. Public Realm - Arboricultural Impact.

(i) The applicant is requested to submit a comprehensive Tree Report to the SDCC Public Realm Section. This shall comprise of 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.

(ii) Survey of Existing Trees and Hedgerows - No equipment, machinery or materials are brought to the site for the purposes of the development, until a written statement detailing the retention and protection of trees on the site has been submitted to and approved in writing by the local planning authority. The submitted statement shall include a survey and assessment of all trees on the site and shall identify on a scaled drawing those trees to be retained and where arboricultural work is proposed. It shall also detail the measures and means of protecting the trees on the site in accordance with British Standards 5837:2005 (Trees in Relation to Construction). The development shall be carried out fully in accordance with the agreed details unless otherwise first agreed in writing with the local planning authority. If within five years from the completion of the development a tree which is agreed to be retained is removed, destroyed, dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, a replacement tree shall be planted within the site of such species and size, and shall be planted at such time, as specified in writing by the Public Realm Section.

(iii) Retention of Identified Trees / Hedges - The trees and hedges identified for retention shall be protected during the course of the development. The trees shall be protected by the erection of temporary fencing in accordance with British Standard 5837:2005 (Trees in Relation to Construction), and the hedges shall be protected by a chestnut paling fence or similar fence to a height of not less than 1.8m and no closer than 1.5m from the hedge unless otherwise agreed in writing. The protective fencing shall be erected before the commencement of any clearing, demolition and building operations and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Within the fenced protection zone(s) no materials shall be stored, no rubbish dumped, no fires lit and no buildings erected inside the fence, nor shall any change in ground level be made within the fenced area unless otherwise first agreed in writing by the Public Realm Section.

(iv) Tree Protection: Drainage and Service Runs - No drainage or service runs (including cables, pipes or similar services) shall be laid beneath the canopy of any tree identified for retention nor within any fenced protection zone unless otherwise agreed in writing by the local planning authority.

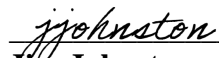
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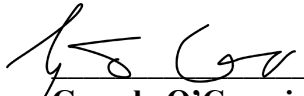
PR/1319/22

## Record of Executive Business and Chief Executive's Order

REG. REF. SD22A/0342


LOCATION: Lands located to the east of Tay Lane, Newcastle Road, Rathcoole, Dublin 24

  
\_\_\_\_\_  
Jim Johnston,  
Senior Executive Planner

  
\_\_\_\_\_  
Gormla O'Corrain,  
Senior Planner

**ORDER:** I direct that **ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

**Date:** 17/10/2022

  
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Mick Mulhern, Director of Land Use,  
Planning & Transportation