



**ARMSTRONG
FENTON**
ASSOCIATES

PROJECT: Clonbrone, Lucan, Co. Dublin

PLANNING STATEMENT: for proposed residential development

CLIENT: Nacul Developments Ltd

DATE: October 2022

**Planning &
Development
Consultants**



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1.0 Introduction

1.1 Design Team

This planning application has been prepared by a qualified design team with vast experience in residential development. The design team for the proposed development includes:

Armstrong Fenton Associates	Town Planners
Crean Salley Architects	Architects
Downes & Associates Consulting Engineers	Project Engineers
Ronan MacDiarmada & Associates	Landscape Architects
Arborist Associates	Consultant Arborist
Enviroguide Consulting	Ecologists
Archaeology Plan	Archaeologist
Redmond Analytical	Public Lighting
3D Design Bureau	CGIs
CS Consulting	Shadow Analysis

This report has been prepared by Armstrong Fenton Associates, on behalf of Nacul Developments Ltd, who are seeking planning permission for the development of 7 no. 5 bedroom detached and semi-detached houses and all associated site development works, car parking, open spaces and landscaping etc., along with the demolition of an existing, detached dwelling on the application site.

1.2 Application Site

The subject site is currently zoned objective RES: *“To protect and/or improve residential amenity”* in the 2022-2028 South Dublin County Development Plan (hereafter “CDP”). The site subject to this application is currently occupied by a two storey detached dwelling, for which permission is now being sought for its demolition, and is known as “Clonbrone”. The subject site is bounded to the east and south by the rear gardens/boundaries of traditional two storey semi-detached dwellings on Esker Lawns. To the west is an existing two storey detached dwelling known as “Clonard”. The existing entrance gates to Clonard and Clonbrone are side by side, accessing onto the Lucan-Newlands Road, which is colloquially known as Esker Hill. To the north of the subject site is a wooded area, zoned objective OS *“To preserve and provide for open space and recreational amenities”*, while further north is the Lucan Road.

1.3 Proposed Development

The permission being sought can be described as follows, as per the public notices:

Nacul Developments Ltd. seeks permission for development at a site known as “Clonbrone”, on Lucan Newlands Road / Esker Hill, Lucan, Co. Dublin, K78 Y5C2. The proposed development consists of the demolition of an existing 2 storey detached dwelling (162m²) and associated out-buildings on site, and the construction of 7 no. 2 storey (plus dormer level), 5 bedroom houses, comprised of 3 no. detached houses and 4 no. semi-detached houses, on a site area of c.0.3ha. The proposed development also provides for all associated site development works, car parking, open spaces and landscaping etc. Proposed access to the development will be via the existing vehicular entrance on the Lucan-Newlands Road / Esker Hill.



1.4 The Applicant

The applicant is Nacul Developments Ltd, and a letter of consent from the landowners Eamon & Deirdre Brennan is enclosed. Eamon & Deirdre Brennan own the neighbouring dwelling to the west, known as Clonard, as well as the adjoining lands to the north, however, they / they lands are not part of Nacul Developments Ltd, but the landowners have issued the required letter of consent to allow the applicant to apply for permission.

1.5 Pre – Planning Consultation

Preplanning consultation took place via Microsoft Teams between the Planning Authority and the planning agent under pre planning reference PP104/21 on 11th October 2021. Details of the proposed development including the site layout plan and planning history were discussed. Cognisance has been paid to the feedback received, and accordingly the proposed development is now put forward for permission.

2.0 General Context

2.1 Site Location & Description

The proposed development has a site area of c.0.3ha and is occupied by a single dwelling known as Clonbrone, which is accessed off the Esker Hill / Lucan – Newlands Road via an existing private vehicular access. To the west of the site is another detached dwelling known as Clonard, also accessed via its own private access gate off the Esker Hill / Lucan – Newlands Road. To the north is a wooded area, which does not form part of the application site. Further north, and at a lower level, is the Lucan Road. To the east and south, the subject site is bordered by the rear boundary walls / gardens of traditional two storey semi-detached dwellings at Esker Lawns.

Lands to the east, west and south are zoned Objective RES: “To protect and/or improve residential amenity”, while the lands to the north are zoned Objective OS: “To preserve and provide for open space and recreational amenities”.

Fig. 1 – Extract from Map 1 South Dublin County Development Plan zoning maps 2022-2028, with subject site outlined in red.

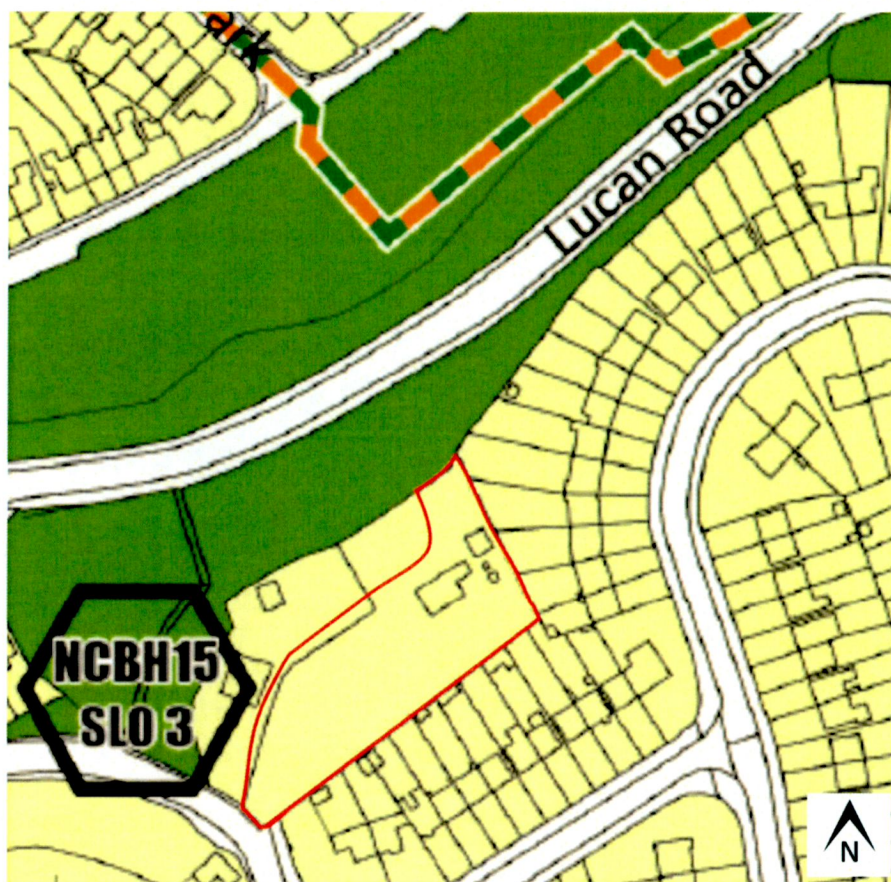




Fig. 2 – Aerial view of subject site with application site outlined in red (Source: Google Maps)

It is proposed to access the proposed development via the established and existing vehicular access gate into Clonbrone.



Fig. 3 – Street view of access to subject site (Source: Google Maps)

2.2 Proposed Use

The site at present is occupied by a detached dwelling (measuring 162.2m²) which has been leased on a temporary basis, however, permission is now sought for its demolition. The house requires significant modernisation to bring it up to contemporary living standards. Given the size of the site and its contextual location, it is considered that the proposed development presents a key opportunity to develop these lands for a sustainable use, complementing adjoining lands and contributing to the housing stock on lands zoned for residential land use.



2.3 Planning History

The following sets out the relevant planning history associated with the subject site, as well as the planning history on adjacent lands:

Ref. SD21A/0026 – permission was sought for the demolition of an existing storey detached dwelling (162sq.m) and associated out-buildings on site, and the construction of 8 no. 2 storey (plus dormer level), 5 bedroom, detached houses, on a site area of 0.3ha. The proposed development also provides for all associated site development works, car parking, open spaces and landscaping. Proposed access to the development will be via the existing vehicular entrance gate on the Lucan-Newlands Road/Esker Hill at a site known as 'Clonbrone' on Lucan Newlands Road/Esker Hill, Lucan. A decision to refuse permission was issued on 6th April 2021 for 8 no. reasons which can be summarized as follows:

1. The proposed new dwellings, particularly houses 7 and 8, were deemed to be overbearing by reason of their excessive height and the proximity to neighbouring dwellings and their private amenity space, resulting in a significant and material loss of light and overshadowing. The proposal was also considered to result in a poor quality and quantity of accommodation for prospective residents, by means of the cramped layout, poor open space and private amenity space, poor outlook and unacceptable sense of enclosure.
2. Given the topography of the site, and the location of the proposed houses adjacent to an area of open space on top of the hill overlooking the Lucan Road, the planning authority was concerned that the proposal would have a visual impact on the site and surrounding area. The design was also considered to be a cramped in the context of the site and surrounding area.
3. The lack of a road safety audit as well as information regarding the proposed vehicular access for the site and the ability of vehicles, emergency vehicles, and refuse vehicles to safely manoeuvre within and access and egress the site, was considered by the local authority to generate a traffic hazard or endanger public safety.
4. It was deemed that there was a lack of information submitted in relation to water, foul water and surface water with the application.
5. The Local Authority was not satisfied with the survey information submitted in relation to existing trees, hedges and vegetation within the site, including details on the impact on a category A1 tree.
6. The Local Authority was not satisfied with the information submitted in relation to ecology and biodiversity and the potential for the site and surrounding area to support wildlife.
7. Matters concerning archaeology and geology and the potential for the site and surrounding area to support archaeological heritage and geology.
8. The proposed development was deemed to set an undesirable precedent for other similar developments, which would in themselves and cumulatively, be harmful to the residential amenities of the area and would be contrary to the proper planning and sustainable development of the area.

Section 2.4 overleaf sets out how the current proposal has addressed the aforementioned reasons for refusal issued under Ref. SD21A/0026.

Ref. SD08B/0156 – this permission relates to the adjoining dwelling Clonard to the immediate west, whereby permission and retention permission was granted on 21st October 2008 for the erection of a palisade fence, some 30 metres long and 2-metres high along the western boundary line and also retention of the existing 2 metres high palisade fence which extends some 35 metres along the northern and western boundary lines.



Ref.s SD06B/0244 & ABP PL06S.218455 – this permission also relates to the adjoining dwelling Clonard, to the immediate west, whereby permission was granted on 21st June 2006 for a new recessed entrance and revised front boundary treatment: a revised curtilage, as compared with site description in planning Reg. Ref. SD05A/0327, to include land within our ownership; complete construction of garden shed and retain work completed to shed at rear of house.

Ref.s SD06A/0745 & ABP PL06S. 222829 – this permission also relates to the adjoining dwelling Clonard, to the immediate west, whereby permission was granted on 19th September 2007 for the retention for 1 no. 2-storey, 4-bed, dwelling house. With a ridge height of 9.2 metres, for use as a family home: as per details of Planning File Ref: SD05A/0327 but with additional floor space of some 15 sq. metres and 2 no. velux roof lights to sides of roof, as constructed with all main services.

Ref. SD05A/0327 – again, this permission relates to the adjoining dwelling known as Clonard to the immediate west, whereby permission was granted on 3rd August 2008 for a two-storey dwelling house and entrance with connection to public services. (Outline File Ref. No. S01A/0702).

Ref.s S01A/0705 & ABP P06S.129493 – this permission relates to the adjoining dwelling known as Clonard to the immediate west whereby outline permission granted on 30th January 2001 for the demolition of an existing single dwelling as condemned by Structural Survey.

Ref. S00A/0389 – permission refused on 4th August 2000 for the development of 7 no. two bedroom apartments and 1 no. one bedroom apartment in 2 no. two storey blocks and the demolition of existing house, on the adjoining site known as Clonard.

Ref. S00A/0035 – permission refused on 23rd March 2000 for the development of 7 no. two bedroom apartments and 1 no. one bedroom apartment in 2 no. two storey blocks and demolition of existing house, on the adjoining site known as Clonard.

On the adjoining site to the south of the subject application site, i.e. at No. 17 Esker Lawns which is located at the junction of Esker Lawns and the Lucan Newlands Road, the following is the relevant planning history attached to same:

Ref.s SD17A/0241 & PL06S.249325 – a notification of a decision to grant permission was issued by South Dublin County Council for the demolition of an existing side extension to the west and rear shed to the north of the existing house known as No. 17 Esker Lawns along with the construction of 2 new 2 storey, semi-detached 3 bedroom houses to the west of the site, along with associated parkin site works and new boundary walls etc. This was subject to a third party appeal but the decision to grant was upheld by An Bord Pleanála who issued an order to grant permission on 14th March 2018.



2.4 Previous Decision under Ref. SD21A/0026

The decision made by South Dublin County Council under Ref. SD21A/0026 contained eight reasons for refusal, with a summary of same set out below, as well as a response as to how the current proposal addresses each of those reasons:

Reason 1:

The proposed new dwellings, particularly houses 7 and 8, were deemed to be overbearing by reason of their excessive height and the proximity to neighbouring dwellings and their private amenity space, resulting in a significant and material loss of light and overshadowing. The proposal was also considered to result in a poor quality and quantity of accommodation for prospective residents, by means of the cramped layout, poor open space and private amenity space, poor outlook and unacceptable sense of enclosure.

Proposed Response:

The application submitted under Ref. SD21A/0026 proposed the development of 8 no. dwellings as per the layout illustrated in Fig. 4 below

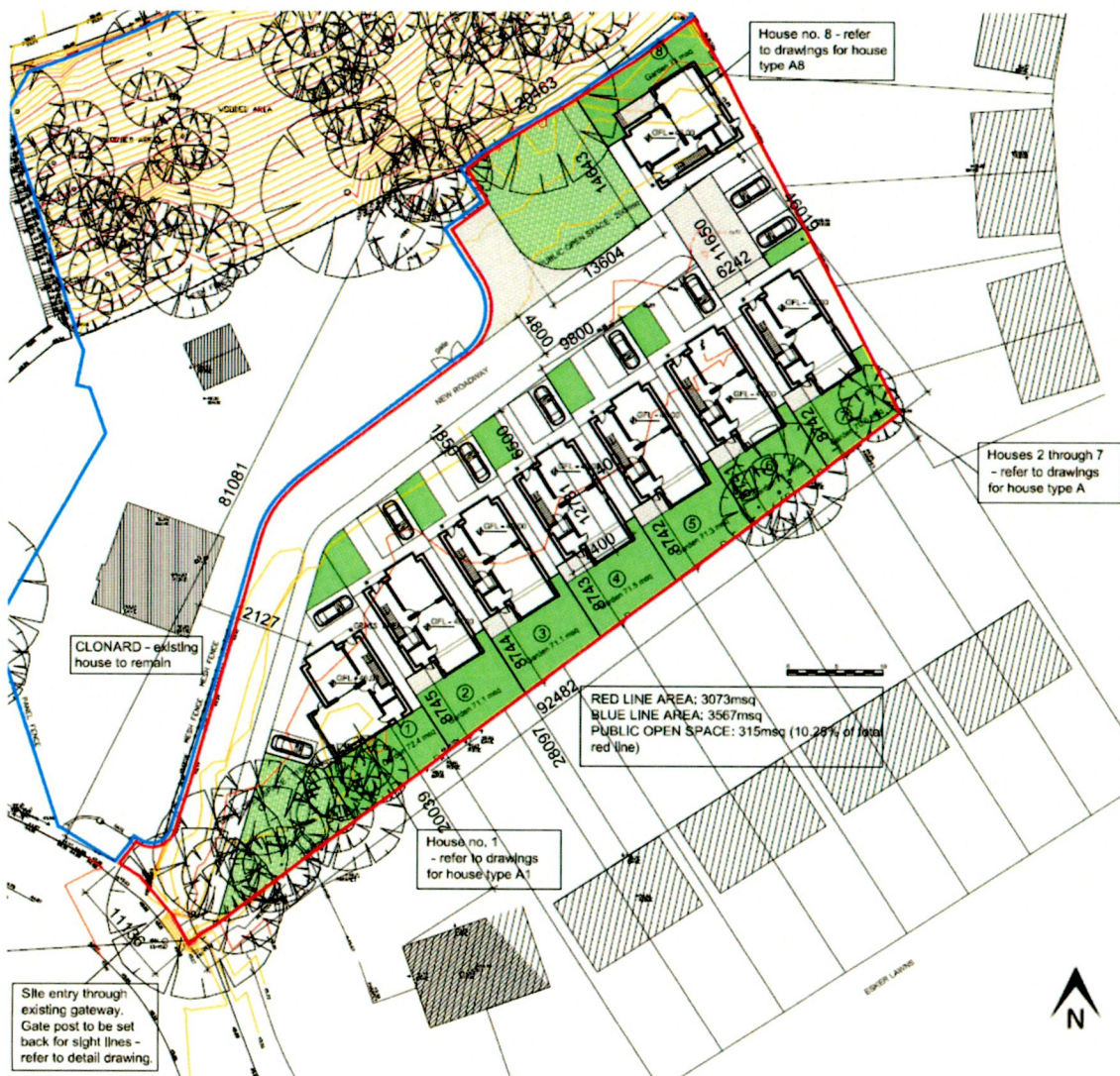




Fig. 4 – Extract from site layout plan submitted for permission under Ref. SD21A/0026.

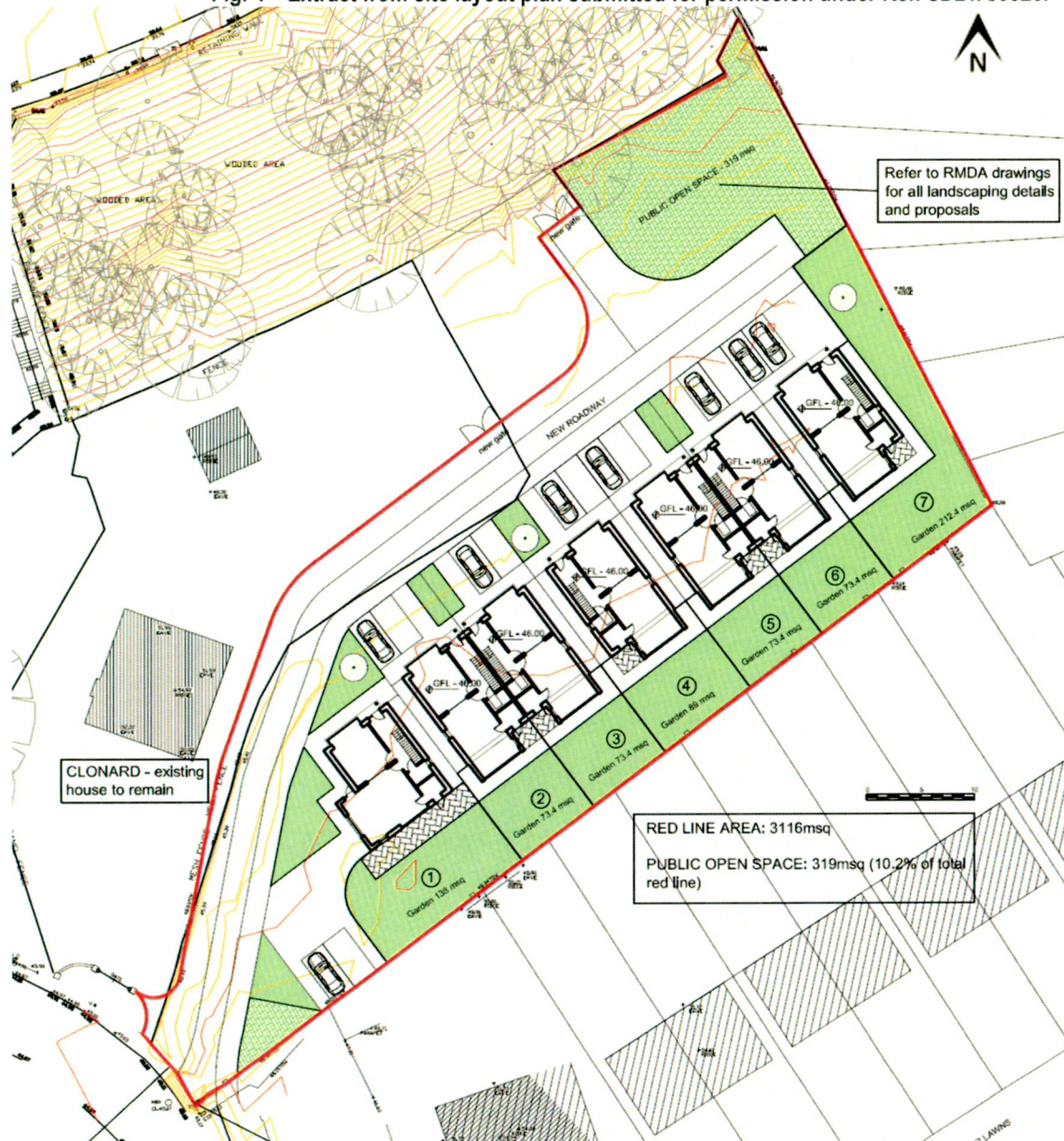


Fig. 5 – Current proposed site layout plan

The current proposal provides for 7 no. dwellings, with house no. 8 omitted. As a result, the proposed public open space is not flanked by any dwellings and the omission of the previously proposed house no. 8 will not result in any overbearing, loss of light or overshadowing of neighbouring properties. In addition, house no. 7 has been pulled back from the neighbouring boundary to the east with the current side gable of the proposed house no. 7 being c.18.6m away from the rear of its nearest neighbour.

The proposed open space will be directly visible from the proposed dwellings, passively supervised and easily accessible. All of the proposed dwellings have private open space in the form of private rear gardens that either meet or exceed the Development Plan standards, with proposed back gardens ranging in size from 73.4m² to 138m², with house no. 7 afforded private open space of 212m².



Reason 2:

Given the topography of the site, and the location of the proposed houses adjacent to an area of open space on top of the hill overlooking the Lucan Road, the planning authority was concerned that the proposal would have a visual impact on the site and surrounding area. The design was also considered to be cramped in the context of the site and surrounding area.

Proposed Response:

The wooded area to the north of the application site is in private ownership and is not open to the public. This area is zoned OS with no development proposed to encroach on same. This wooded area is in the private ownership of the adjoining landowners of Clonard, is not open to public use and shall remain so. It is a steeply sloping site. The applicant has no control over same and while it is zoned OS, it is in private use. Even if the applicant had control of the lands zoned OS, it is not considered that upon the completion of the development that it would be taken in charge by the Local Authority given its topography and planted condition. The proposed development is a conventional housing scheme whereby the roads, services and open spaces may be taken in charge in the future, yet the wooded area to the north would have to be privately managed and there are likely maintenance and insurance issues associated with opening up this land. Notwithstanding this, the fact remains that the applicant does not have control of the OS lands to the north of the application site, nor the consent from the landowner to include same in this application for permission as the wooded area is in their private use and shall remain as such.

The OS zoned lands to west of Clonard will not be visually affected by the proposed development given that the nearest proposed dwelling i.e. house no. 1 is separated by c. 35m from this space, with Clonard positioned in between. 3D Design Bureau have prepared the submitted verified views and we refer the reader to same which demonstrate that the proposed development will not result in a visual impact on the receiving environs. Please refer to the submitted verified views but also to Fig.s 6 and 7 overleaf which are just two examples taken from the submitted verified views. Fig. 6 is a view taken from the OS land to the west of Clonard and none of the proposed dwellings will be visible from same. Fig. 7 is a view taken from the Lucan Road to the north, which is at a considerably lower level than the subject site. It is evident from Fig. 7 that the proposed dwellings will not be visible over the existing tree canopy in the wooded area (with Fig. 7 taken when there was no foliage on the trees) and will not have a visual impact when viewed from the Lucan Road.

The ridge height of the existing neighbouring dwelling at Clonard is c. 54mOD, with the footpath on the northern side of the Lucan Road being c. 34mOD, so a c.20m difference. The application site has a level of c.48m OD with the height of the proposed dwellings having a ridge levels of c.9.1m and c.9.8m which equates to an OD level of c.57m, so a difference of 23m from the Lucan Road. Due to the extensive tree cover, the existing dwellings of Clonard and Clonbrone are not visible from the Lucan Road nor are they visible from the dwellings at Brookvale to the south-west, which are lower than the subject site. Taking all of the above and the submitted verified views, it is put forward that there will be no visual impact arising from the proposed development.



Fig. 6 – Extract from submitted Verified View no. 4 – view from open space zoned lands to the west of Clonard



Fig. 7 – Extract from submitted Verified View no. 6 – view from Lucan Road to the north looking up towards the subject site

**Reason 3:**

The lack of a road safety audit as well as information regarding the proposed vehicular access for the site and the ability of vehicles, emergency vehicles, and refuse vehicles to safely manoeuvre within and access and egress the site, was considered by the local authority to generate a traffic hazard or endanger public safety.

Proposed Response:

A Road Safety Audit has been prepared by Roadplan Consulting and is submitted with this current application – please refer to Appendix C of the submitted infrastructural report prepared by Downes & Associates Engineers.

Reason 4:

It was deemed that there was a lack of information submitted in relation to water, foul water and surface water with the application.

Proposed Response:

Downes & Associates Consulting Engineers have prepared the submitted drainage proposals to serve the development – please refer to same.

Reason 5:

The Local Authority was not satisfied with the survey information submitted in relation to existing trees, hedges and vegetation within the site, including details on the impact on a category A1 tree.

Proposed Response:

Arborist Associates have prepared the submitted and updated arboricultural survey of the subject site. In addition, Ronan MacDiarmada & Associates Landscape Architects have prepared the submitted “Combined Landscape & Engineer Plan” (drawing no. 4) and “Combined Landscape & Arborist Plan” (drawing no. 5) and it is evident from the submitted drawings and details that the category A1 tree (noted as tree no. 0460 on the Arborist's assessment) which is an Oak tree is being retained and will not be impacted upon by the proposed development. Please refer to the drawings and impact assessment prepared by Arborist Associates for further details.

Reason 6:

The Local Authority was not satisfied with the information submitted in relation to ecology and biodiversity and the potential for the site and surrounding area to support wildlife.

Proposed Response:

Enviroguide Consulting has prepared the submitted Appropriate Assessment (AA) Screening Report and Ecological Impact Assessment (EclA) of the proposed development. In appendix IV of the EclA, is a Bat Assessment undertaken by Dr. Tina Aughney, which includes a survey of the existing dwelling on site “Clonbrone”. The findings of these reports have informed the design and layout of the proposed development – please refer to all of the aforementioned reports for further details.



Reason 7:

Matters concerning archaeology and geology and the potential for the site and surrounding area to support archaeological heritage and geology.

Proposed Response:

Archaeology Plan has prepared the submitted Archaeological and Geological Heritage Impact Assessment report – please refer to same for full details. The following sets out a summary of the submitted report which states that there is limited archaeological potential on the site, but there is risk of below ground archaeological remains due to the lack of disturbance site over the last 400 years. There is no above-ground evidence of archaeological features on the site and the closest excavations have not found archaeology. The nearest monuments are 300m away but suggest local early medieval occupation.

There is one ex-situ feature of Industrial Heritage on the site, possibly installed by George or more likely Richard, Shackleton in the years following the conversion of Anna Liffey Mills to rollers in the 1880s. Confirmation that they are French Buhr Stones has been provided by Niall Colfer and Fred Hamond (pers. comm.). It has been confirmed that that the "sundial" had milling origins, and that it is one of series of objects created by Mr Laddie Birnie, a former employee of Hills Mills (1860–1988) who passed away some years ago. It is proposed to retain the sundial on the site and to place same within the proposed public open space in the north-east part of the site and the submitted landscaping proposals affirm this.

In terms of geological potential on the subject site, the submitted impact assessment report states that the site is situated approximately 300m from the Esker Ridge, which is an important element of geological and historical heritage. However, despite nearby townland and housing estate names, the site is outside its current limits, on a low ridge overlooking the Lucan Road. The submitted report asserts that *"the development is considered unlikely to impact on any archaeology or geological heritage. It is outside the zone of archaeological constraint. However, without testing, the impact cannot be completely confirmed. The development will not have an impact on the Lucan Esker"*.

Please refer to the submitted Archaeological and Geological Heritage Impact Assessment report, which also includes mitigation measures, for full details.

Reason 8:

The proposed development was deemed to set an undesirable precedent for other similar developments, which would in themselves and cumulatively, be harmful to the residential amenities of the area and would be contrary to the proper planning and sustainable development of the area.

Proposed Response:

It is considered that this is a generic / "catch all" reason for refusal but the drawings and details contained in this current application for permission will confirm the merits of the proposed development and why it ought to be granted permission. In assessing this application for permission, we request that the Planning Authority judiciously considers the locational context of the site, its impacts on the receiving environs and the high quality of housing proposed which is considered to be a respectful form of development and appropriate for the subject site.



3.0 Planning Context

3.1 South Dublin County Development Plan 2022-2028

The proposed development site is zoned objective RES: “*To protect and/or improve residential amenity*” in the 2022-2028 South Dublin County Development Plan (hereafter referred to as the CDP). Therefore, the principle of the proposed development is acceptable.

The following policies/sections of the CDP are applicable to the proposed development:

Policy CS1: Strategic Development Areas - Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.

Section 2.6 Land Capacity and Zoning Requirements

Policy CS3: Monitoring Population and Housing Growth: Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County.

Policy CS6: Settlement Strategy - Strategic Planning Principles - Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.

CS6 Objective 2: To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).

Section 2.7 - Key Urban Centres within Dublin City and Suburbs states that “*Lucan is situated 14 kilometres to the west of Dublin City along the N4 economic corridor. It is characterised by an historic village core surrounded by generally low density suburban neighbourhoods based around a polycentric network of local retail centres and a level 3 district centre. The area is served by high frequency bus routes to Dublin City. The Dublin – Kildare rail line serves communities, including Adamstown, to the south of Lucan. Employment is provided for locally through mixed use retail and commercial areas adjacent to the village core. Grange Castle and other business parks provide employment to the south. The GDA Transport Strategy proposes a Luas line to Lucan from Dublin City and upgrading of the Kildare line as far as Hazelhatch involving electrification and high-frequency commuter services*”.

Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement - Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.

CS7 Objective 3: To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).

Policy NCBH1: Overarching - Protect, conserve and enhance the County’s natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations.

Policy NCBH2: Biodiversity - Protect, conserve, and enhance the County’s biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.

Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas - Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected



under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.

Policy NCB12: Geological Sites - Maintain the conservation value and seek the sustainable management of the County's geological heritage resource.

Policy NCBH13: Archaeological Heritage - Manage development in a manner that protects and conserves the Archaeological Heritage of the County and avoids adverse impacts on sites, monuments, features or objects of significant historical or archaeological interest.

Policy NCBH15: Views and Prospects - Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County.

Policy NCBH22: Features of Interest - Secure the identification, protection and conservation of historic items and features of interest throughout the County including street furniture, surface finishes, roadside installations, items of industrial heritage and other stand-alone features of interest.

Policy GI1: Overarching - Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.

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 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.

Policy QDP1: Successful and Sustainable Neighbourhoods - Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities.

Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods - Promote the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.

QDP2 Objective 1: To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal.

QDP2 Objective 2: To ensure that 'The Plan Approach' to development is taken into consideration by the applicant and demonstrated during any pre-application consultations (under section 247 of the Planning & Development Act, 2000, as amended).

Policy QDP3: Neighbourhood Context - Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.



Policy QDP4: Healthy Placemaking - Promote the delivery of neighbourhoods that are attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.

Policy QDP5: Connected Neighbourhoods - Promote short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.

Policy QDP6: Public Realm - Promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.

Policy QDP7: High Quality Design – Development General - Promote and facilitate development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture.

Policy QDP11: Materials, Colours and Textures - Promote high-quality building finishes that are appropriate to context, durable and adhere to the principles of sustainability and energy efficiency.

H1 Objective 12: Proposals for residential development shall provide a minimum of 30% 3-bedroom units.

Policy H7: Residential Design and Layout - Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.

Policy H8: Public Open Space - Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area.

Policy H9: Private and Semi-Private Open Space - Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.

Policy H10: Internal Residential Accommodation - Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.

Policy H13: Residential Consolidation - Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.

Policy SM1: Overarching – Transport and Movement - Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.

Policy SM2: Walking and Cycling - Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets.

Policy SM6: Traffic and Transport Management - Effectively manage and minimise the impacts of traffic within the County having regard to the need to provide shared road space for different users.



Policy SM7: Car Parking and EV Charging - Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities.

Policy COS5: Parks and Public Open Space – Overarching - Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County.

8.7.3 Quantity of Public Open Space

Chapter 12 “implementation and Monitoring”.

There is also a specific local objective attached to lands to the west of the application site, namely: **NCBH 15 SLO 3: To seek to develop the area at the top of Esker Hill as a viewing location for views over Lucan Village and the Liffey Valley.**

3.2 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009.

The 2009 Guidelines on Sustainable Residential Development in Urban Areas set out the key planning principles for the preparation and assessment of applications for residential development in urban areas. Included in these guidelines are details on appropriate densities of development for a variety of site types including “inner suburban / infill” sites. Section 5.9 of these guidelines states the following in relation to an appropriate form and density of development for an infill site such as the subject application site:

“Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill”. The guidelines go on to say that: *“The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.”.*

4.0 Part V - Social Housing

It is the applicant’s intention to fully comply with the requirements of the Housing Department in relation to the provision of Social & Affordable Housing, in the event of a condition for the provision of same being attached to a grant of permission for this development. It is proposed to provide 1 no. unit, i.e. house no. 3, a 5 bedroom semi-detached house and we enclose indicative costings re same. The applicant has engaged with the Housing Department of South Dublin County Council regarding their proposal as confirmed by their enclosed letter, dated 5th September 2022. The proposals put forward by the applicant are subject to agreement with the Housing Department prior to the lodgement of a commencement notice, in accordance with the relevant statutory provisions. The applicant encloses as part of this application the necessary details in relation to Part V proposals for the purposes of validating this application for permission. The unit to be acquired and acquisition prices etc. are to be agreed subsequent to a grant of permission and prior to lodgement of commencement notice.



5.0 Proposed Development

A summary of the permission being sought is as follows:

- Demolition of existing 2 storey detached dwelling known as Clonbrone (162.2m²);
- Construction of 7 no. 5 bedroom detached and semi-detached dwellings that are 2 storeys in height plus dormer level;
- Provision of open spaces and landscaping, car parking and all associated site development works;
- Access to the proposed development is to be via the existing vehicular entrance onto the Esker Hill / Lucan-Newlands Road.



Fig. 8 – Aerial view of application site outlined in red (Source: Google Maps)

5.1 Context of Proposed Development

The application site is currently occupied by a single dwelling, known as “Clonbrone” and this application for permission seeks to demolish Clonbrone (and its associated out buildings) and to redevelop the site for housing in a manner that will increase the housing provision in the locality, provide a more efficient and sustainable use of this zoned site and to do so in a manner that is in keeping with the character of the receiving environs.

It is considered that the demolition of the existing dwelling on site will have no negative impact on the receiving environs as it is not a Protected Structure and is not listed on the NIAH Inventory. The existing dwelling is considered to be of little or no architectural significance.



Fig.s 9 & 10 -

Images of Clonbrone
– proposed to be
demolished

National Planning Framework (Project Ireland 2040)

We note that under the National Planning Framework (Project Ireland 2040) (hereafter NPF) that its number one strategic objective, Compact Growth, sets a clear development outcome to grow our existing urban areas creating a priority to build on brownfield / infill development first, before considering greenfield lands.

Furthermore, the site can be classed as an infill site, with Section 12.6.8 of the CDP “Residential Consolidation Infill Sites” states that development on infill sites should meet, *inter alia*, the following criteria:

- *Be guided by the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009 and the companion Urban Design Manual;*
- *A site analysis that addresses the scale, siting and layout of new development taking account of the local context should accompany all proposals for infill development. On smaller sites of approximately 0.5 hectares or less a degree of integration with the surrounding built form will be required, through density, features such as roof forms, fenestration patterns and materials and finishes;*



- *Significant site features, such as boundary treatments, pillars, gateways and vegetation should be retained, in so far as possible, but not to the detriment of providing an active interface with the street;*
- *Proposals to demolish a dwelling(s) to facilitate infill development will be considered subject to the preservation of the character of the area and taking account of the structure's contribution to the visual setting or built heritage of the area;*
- *It should be ensured that residential amenity is not adversely impacted as a result of the proposed development;*
- *Delivery of Public Open Space and Contribution in Lieu shall be in accordance with the provisions set out under Section 8.7.4 of Chapter 8: Community Infrastructure and Open Space.*

The subject site is zoned for residential land use and is occupied by a single dwelling. It offers no current efficient use of a zoned serviced site, is surrounded by existing residential use and therefore the proposed development of 7 no. dwellings is considered to be acceptable, given both the locational context and land use zoning of the site. Section 11.3.2 of the CDP states the following in relation to Infill Sites:

In response to the above guidance, we set out the following:

The proposed site layout plan has taken into account the configuration and orientation of the subject site, as well as adjoining residential development. The principles of good urban design have been applied to the scheme where *inter alia* context, legibility, adaptability etc. are all applied. Cognisance has been paid to the existing pattern, scale and established pattern of development in the environs. As the site is abutted to the south and east by traditional two storey suburban housing, the scale and setback of the proposed development reflects this, such that there will be no impacts on adjoining residential amenity.

The northern boundary of the subject site abuts third party OS zoned lands that are planted and provide for screening when the site is viewed from the north. The scale and height of the proposed development will be sufficiently screened from the north due to this planting, as confirmed by the submitted verified views. The layout of the proposed houses, the roof pattern, the location of the dormer windows all accord with good principles of design such that no overlooking, overshadowing of neighbouring properties will occur. This too is confirmed by the submitted Sunlight, Daylight & Shadow Assessment – please refer to same. A tree and hedgerow survey has been carried out as well as an Ecological Impact Assessment and a bat survey, all of which have been taken into account as part of the current development proposal.

The application site occupies an area of 0.3ha. On its eastern and southern side, the rear gardens of existing dwellings at Esker Lawn back onto the boundary of the site and therefore, in order to avoid any negative overlooking or impact on existing, neighbouring residential amenity, the rear gardens of the proposed dwellings will back onto neighbouring back gardens in a traditional housing layout manner. This affords privacy to the existing neighbouring dwellings but provides for south and east facing gardens for the proposed dwellings. The scale, pattern and density of the proposed development is reflective of its suburban setting and the established character of the area. All neighbouring dwellings are two storeys in height, with the proposed dwellings to be two storeys, plus the upper floors on all of the proposed dwellings are accommodated within the roof plane, with dormer windows to the front only, and rooflights to the rear to avoid any overlooking of neighbouring properties. Therefore, the proposed houses have the appearance of being 2 storey dwellings plus dormer level. As outlined earlier, the previously proposed house no. 8 on the north-eastern boundary has been omitted and house no. 7 set further back from the eastern boundary of the site to reduce any perceived overbearing impacts on neighbouring properties.



The subject site contains and is bordered by tree planting. This application is accompanied by a tree and hedgerow survey (Arboricultural Assessment), which also highlights the trees to be retained and incorporated into the proposed development, along with monitoring measures to be employed on site during construction to ensure protection of the trees being retained on site. It should be noted that to the north of the application site, in third party ownership is a wooded area that is zoned OS. This wooded area is not being impacted upon by the proposed development, as confirmed by the submitted Arboricultural Assessment. On the boundary of this linear woodland belt with application site, is a mature Oak, Tree No.0460 which is located on the site side of this linear woodland. This tree will be retained and not impacted upon by the proposed development.

The existing vehicular entrance to the site is being maintained and is proposed to be the main access point into the scheme but will be upgraded as per the enclosed drawings.

5.2 Design & Layout

Seven no. detached and semi-detached dwellings are proposed to be developed on the application site. The layout of the development is respectful in terms of the receiving environs, as the proposed houses essentially follow the line of existing housing to the south, backing onto the rear property boundaries of existing houses at Esker Lawns to the south. There is an adequate setback from neighbouring properties to the east, with no houses proposed to back onto / be positioned along the western, eastern or northern boundaries of the subject site. This affords privacy and maintenance of existing residential amenity to neighbouring properties, and maintains natural amenity to the north whilst also allowing good southerly aspect to the rear gardens of the proposed houses.

The proposed houses all benefit from dual aspect with appropriately sized private rear gardens, in accordance with minimum standards of the CDP. The proposed internal layouts have been designed to provide generous living accommodation on the ground floor, whereby the kitchen / dining / family room spaces having the benefit from direct access and a strong visual relationship with the rear garden. A utility room off the kitchen and a wheelchair accessible WC are also provided on the ground floor with master and secondary bedrooms on the first floor. All of the proposed houses have the benefit of the dormer level accommodating 2 bedrooms, a bathroom and additional storage at the upper most level. The 2 bedrooms at the uppermost level will have dormer windows to the front overlooking the public realm with the bathroom and storage areas will have rooflights on the rear roof plane, thus not overlooking the neighbouring properties at Esker Lawns. Therefore, the rear of the houses will be viewed as traditional two storey houses. The proposed living and bedrooms have been designed in accordance with the room sizes for dwellings as identified in the DoEHLG 2007 guidance document 'Quality Housing for Sustainable Communities'. Each of the proposed houses has a floor area of 178.5m².

The proposed elevational treatment of the houses is a contemporary take on a traditional suburban house. The finishes will be a mixture of brick, render, with timber windows and doors, with zinc dormer windows and zinc canopies over the proposed ground floor bay windows and front entrance doors.

The first house (House No. 1) has been designed to take into account its location adjacent to the main access road into the site. It has dual frontage, with its western and northern elevations having active facades that address the public realm thus affording passive surveillance to the west and north. All of the proposed houses respect the required 22m separation for first floor opposing windows. There are no directly facing habitable room windows in house no. 7 that would result in harmful overlooking to the east.

Taking all of the foregoing into account, it is put forward that the proposed development is an appropriate design response for this underutilised, infill site and is a development proposal that respects the established character of the area. Careful consideration has been paid to the design of the proposed houses such that there will be no impacts on neighbouring dwellings in terms of overlooking, overshadowing or overbearing, given the scale of the current proposal.



The submitted verified views and Sunlight, Daylight & Shadow Assessment of the proposed development demonstrates that the scale, character and design of the proposed development successfully integrates into this infill site – please refer to same.

We note that to the west of the application site that the CDP contains a specific local objective i.e. **NCBH 15 SLO 3**: “To seek to develop the area at the top of Esker Hill as a viewing location for views over Lucan Village and the Liffey Valley”. The lands subject to this SLO are to the west of the subject application site and not in the control of the applicant. The lands subject to this SLO are in an elevated position, however, are currently surrounded by tree planting / vegetation on their northern, southern and western boundaries. To the immediate west is the existing private dwelling Clonard, which provides a substantial buffer between the proposed development and the lands subject to the SLO. Lucan Village and the Liffey Valley are to the north/north-west of the lands subject to the SLO, therefore the proposed development to the east/south-east of same will not impact on any views from a potential viewing area across to Lucan Village and the Liffey Valley. The submitted verified views (no.s 3 & 4) demonstrate that the proposed dwellings will not be visible from this area of open space and will therefore not impact on its objective as a viewing location for views over Lucan Village and the Liffey Valley.

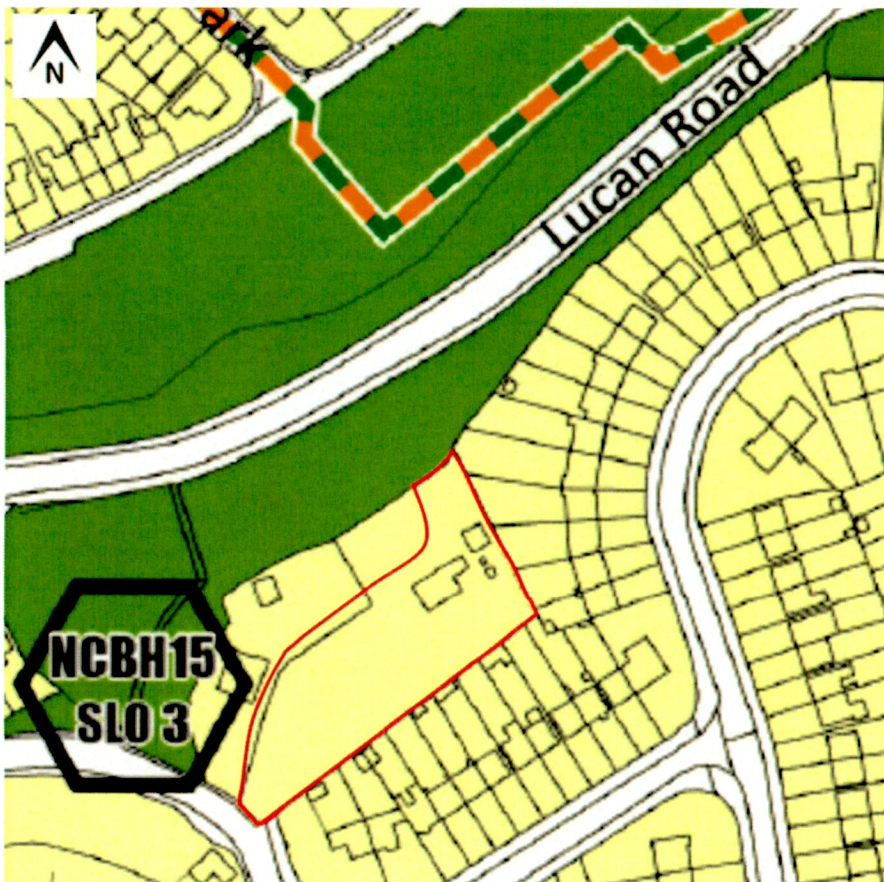


Fig. 11 – Extract from Map 1 of the South Dublin County Development Plan 2022-2028 with subject application site outlined in red, located to the east of lands subject to NCBH 15 SLO 3

It should also be noted that the third party OS lands abutting the application site to the immediate north, are also planted with trees, thus camouflaging the proposed development from any views from the north, Lucan Road etc. which is also confirmed by the submitted verified views (No.s 5 & 6).



5.3 The Delivery of Sustainable Neighbourhoods 'The Plan Approach'

We note that the CDP (Section 5.2.1) promotes the creation of successful and sustainable neighbourhoods through the application of the eight key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County.

In accordance with QDP2 Objective 1: "To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design" – the following is a statement detailing how 'the Plan Approach' eight key design principles have been incorporated into the design of the development, as per QDP2 Objective 1 of the CDP:



Fig. 12 – Extract from Figure 1 of the CDP "Eight Design Principles".

Context - Consider existing natural, cultural and built heritage features and green infrastructure elements as well as social, economic and environmental factors that impact on an area.

Response: The subject site is an underdeveloped and underutilized site which is proposed to become reinvigorated as a modern, high quality residential development. The proposed development now being put forward for permission has been designed to be complementary to its receiving environs, by being set back from its northern, eastern and western boundaries. The proposed development follows the existing line of housing to the south, replicating the traditional manner of suburban back to back housing. The design of the layout allows for sufficient separation distances so as to have no negative or overbearing impacts. The proposed building heights of 2-3 storeys carefully considers adjoining building heights with the dormer second floor level facing northwards and not overlooking or overbearing neighbouring housing. The subject site occupies a fairly secluded location, surrounded by planting. The proposed development seeks to retain as much trees as possible and will not impact on any category A trees on or adjoining the site. The submitted verified views demonstrate that there will be no negative visual impact arising from the proposed development and that when viewed from the outside, there will no material change to the current external appearance of the site. The proposed development has been subject to *inter alia* ecological, archaeological and arboricultural assessments, all of which have informed the proposed design and layout of the development. The scale and massing of the proposed houses, as well as the layout of the development on the subject site has been judiciously considered in terms of its assimilation into this site and the receiving environs.



Healthy Placemaking – *Promote good urban design, which seeks to create public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate social interaction.*

Response: The subject site occupies an area of just 0.3Ha (just over 3,000sq.m). The existing curtilage of the property is not visible from the public realm. The proposed development provides the required amount of public open space that will be directly visible from each of the dwellings thus providing passive supervision and recreational amenity. Neighbouring open spaces will not be impacted by the proposed development in terms of accessibility or visual impact.

Connected Neighbourhoods - *Promote public transport and other transport facilities that mitigate dependence on cars, promote safe walking and cycling, while assisting with internal movements within neighbourhoods.*

Response: The subject site has direct access, including pedestrian paths, to the Lucan Road to the north (c.200m) and into Lucan Village (c.400m). There is a wide range of local services including 3 no. primary schools and 2 no. secondary schools which are within a c.500m walking distance of the site.

Thriving Economy - *Ease of access to and availability of good jobs and a good quality of life for the community at large.*

Response: The CDP acknowledges that “*Lucan is situated 14 kilometres to the west of Dublin City along the N4 economic corridor. It is characterised by an historic village core surrounded by generally low density suburban neighbourhoods based around a polycentric network of local retail centres and a level 3 district centre. The area is served by high frequency bus routes to Dublin City. The Dublin – Kildare rail line serves communities, including Adamstown, to the south of Lucan. Employment is provided for locally through mixed use retail and commercial areas adjacent to the village core. Grange Castle and other business parks provide employment to the south. The GDA Transport Strategy proposes a Luas line to Lucan from Dublin City and upgrading of the Kildare line as far as Hazelhatch involving electrification and high-frequency commuter services*”. Given the site’s proximity to the village i.e. c.400m walking distance, it is considered that the subject site is well located proximate to a wide range of employment opportunities and/or public transport services to access same.

Inclusive and Accessible - *High quality services, community infrastructure and open spaces accessible to all.*

Response: The site is currently in the form of an enclosed and secluded private residence. The redevelopment of the site, as currently proposed, opens up the site to new multiple occupations, as well as the delivery of an area of open space that is accessible to all.

Public Realm - *A real sense of place, positive purpose and local distinctiveness, where buildings are not only attractive but also safe and useful with lots of green and open spaces for people to spend time, relax and play.*

Response: The subject site is an enclosed, secluded, infill site occupied by one dwelling. The proposal to redevelop the site to cater for family type homes will cater for increased occupancy and breathe new life into the site. It is a small, urban, infill site that will accommodate 7 no. high quality homes overlooking its own new public open space, that has a local and historical connection by way of the retained sundial that will be placed in the open space. The existing, wooded area to the north, which is privately owned by a third party, will be directly viewed by the new homes offering seclusion and local distinction.



Built Form and Mix – *Promotes a mix of uses with appropriate increases in density and building heights in the right locations maximising the existing transport network and existing infrastructure.*

Response: The site occupies an area of just over 3,000sq.m. Its locational context in terms of elevated position, existing housing to its immediate east, south and west, the existing planting on site as well as its size and configuration, lends itself to a form of development such as that proposed. Its land use zoning objective RES is to protect and / or improve residential amenity and taking this on board, every effort has been made to ensure that existing neighbouring residential amenity is not impacted upon. Furthermore, cognisance has been paid to the 2009 Sustainable Residential Development in Urban Areas Guidelines (section 5.9) which states that *“The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure”*. The Guidelines states that such development can be provided in two ways, either by infill or by subdivision. The subject site is considered to be an infill site, and accordingly, the aforementioned Guidelines state the following with respect to infill residential development: *“Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill”*. It goes on to say that *“the design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.”*. Based upon all of the foregoing, the proposed development is put for permission.

Design and Materials - *High quality design, materials and finishes and good quality landscaping with robust maintenance protocols for all large residential, commercial and employment developments.*

Response: Crean Salley Architects and Ronan MacDiarmada and Associates have prepared the proposed architectural and landscaping proposals, which based upon the principles of good urban design, and being informed by other design team members such as ecologists and arborists have put forward the proposed development for permission. The proposed materials to be applied to the houses are of a traditional and durable nature but create contemporary homes that will be sustainable in the long term. The landscape proposals have been designed to compliment the setting and neighbouring lands in terms of biodiversity and SUDs and will create an amenable development that will successfully assimilate into its setting as it matures over time.

The proposed house are large enough to be adaptable in terms of accommodating a home office for work, downstairs bedroom for older persons or persons with a disability. The houses can be lifetime homes or accommodate multi-generations.



5.4 Schedule of Accommodation

The proposed development is comprised of 7 no. detached and semi-detached, 5 bedroom dwellings, along with public open spaces, landscaping and all associated site development works.

Table 1 sets out the proposed schedule of residential accommodation:

House Type	Description	No. of Units	GFA (m ²)	Total GFA (m ²)
A	5 bedroom detached / semi-detached house	7	178.5	1,249.5

Table 1 – Proposed Schedule of Houses

All space provisions and sizes comply with the targets and standards as set out in the Quality Housing for Sustainable Communities Guidelines, DEHLG 2007 with regard to minimum room sizes, dimensions and overall floor areas. All floor areas comply with the South Dublin County Council Development Plan minimum space standards for houses i.e. Table 3.20 of same. Please refer to Table 2 over for a full schedule of the proposed internal accommodation.

We also note that in assessing the previous planning application on this site that the planner stated the following in relation to unit mix: *“The proposal would provide eight 5 bed units which would generally be considered as an acceptable unit mix subject to the other relevant planning considerations”*. It is therefore considered that the proposed dwellings not only provide a large area of accommodation but are also adaptable and could cater for home offices / studies / playrooms etc. which have become contemporary living requirements.

Table 2 – Proposed Internal Schedule of Accommodation:

House No.	Description	Gross Floor Area (m ²)	Living Room (m ²)	Kitchen / Dining Area (m ²)	Aggregate Living Area (m ²)	Bedroom No. 1 (m ²)	Bedroom No. 2 (m ²)	Bedroom No. 3 (m ²)	Bedroom No. 4 (m ²)	Bedroom No. 5 (m ²)	Aggregate Bedrooms (m ²)	Storage (m ²)
1	2.5 storey 5 bed / 9P house	178.5	21.4	30.9	52.3	13.9	7.7	12.5	12.7	12.7	59.5	8.4
2, 4, & 5	2.5 storey 5 bed / 8P house	178.5	22.7	29.1	51.8	15.7	8.7	11.7	10.1	13.4	59.6	11.6
3, 6 & 7	2.5 storey 5 bed / 8P house	178.5	22.7	29.1	51.8	15.7	8.7	11.7	10.1	13.4	59.6	13.6



5.5 Density

The proposed development comprises 7 no. dwellings on a site area of 0.3Ha which produces a net and gross density of approx. 23 units per hectare, which given the infill nature of this site and prevailing pattern of development in the environs, is considered to be an appropriate level of density for the subject site.

In relation "Infill Sites", section 12.6.8 of the CDP states that *"on smaller sites of approximately 0.5 hectares or less a degree of integration with the surrounding built form will be required, through density, features such as roof forms, fenestration patterns and materials and finishes"*. Furthermore, the 2009 Sustainable Residential Development in Urban Areas Guidelines (section 5.9) state that *"The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure"*. The Guidelines states that such development can be provided in two ways, either by infill or by sub-division. The subject site is considered to be an infill site, and accordingly, the aforementioned Guidelines state the following with respect to infill residential development: *"Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill"*. It goes onto say that *"the design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc."*.

We also note that the Guidelines refer to "edge of centre sites" and state that *"the emphasis will be on achieving successful transition from central areas to areas at the edge of the smaller town or village concerned. Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 20-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation"*. The application site is 0.3Ha in area, located in a long-established residential area and based upon the size, configuration, orientation, neighbouring properties, and elevated nature of the site, it is considered that the proposed development of 7 houses on this infill site, which equates to a density of 23 units per hectare is appropriate in terms of the guidance provided for such sites in both the CDP and Ministerial Guidelines.

In addition to the above quoted text from both the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009, and the Development Plan, we note that in April 2021, the Department of Housing, Local Government and Heritage (DoHLGH) issued Circular Letter NRUP 02/2021 in relation to residential densities which states that *"towns and their contexts are clearly not all the same, and planning policy and guidance are intended to facilitate proportionate and tailored approaches to residential development, including the flexible application of residential density considerations further to current statutory ministerial planning guidelines"*.

Taking into account the guidance set out in both the Development Plan for infill site and the Sustainable Residential Development in Urban Areas Guidelines, in addition to the character of the receiving environs, the design of the proposed dwellings and the site layout plan, along with the OS zoned lands to the immediate north, it is put forward that the proposed density is appropriate and accords with the relevant guidance on density.



5.6 Public and Private Open Space

5.6.1 Public Open Space

Public Open Space is being provided at a minimum rate of 10% of the total site area, in accordance with Tables 8.2 and 12.22 of the CDP. This application is accompanied by landscaping proposals for the proposed development, prepared by Ronan MacDiarmada & Associates (RMDA) Landscape Architects. The proposed open space is well located and overlooked by the majority of the proposed dwellings. It is accessible and useable. Its location has been carefully considered in terms of the following:

- Size, configuration and orientation of the application site;
- Compliance with Development Plan standards;
- Accessibility for future residents of the scheme;
- Impact on adjoining properties and
- Passive supervision.

As one enters the site, the public open space is directly in view. There are no proposed dwellings directly abutting same thereby having no overbearing impact or creating spaces that might lead to anti-social behaviour. The rear of the properties to the east will not be impacted upon in terms of previously perceived overbearing and overshadowing issues. The layout of the proposed development is set back from large, good quality trees along / abutting the northern boundary of the application site, thus ensuring their retention. The positioning of the proposed open space alongside the neighbouring wooded area is a sympathetic design response in terms of use and biodiversity.

The adjoining wooded area is in third party ownership and the applicant has no control over same. It is in private ownership, is maintained by the third party property owner and is not open to or used by the public. It is our understanding that this situation will be maintained and no consent has been offered to the applicant to connect into these adjoining lands. However, it is put forward that future home owners on the subject site will have the benefit of having direct views of this wooded area to the north, which will be enhanced by the location of the proposed public open space.

RMDA Landscape Architects have prepared the submitted landscape proposals which propose to incorporate the existing sun dial on the site into the public open space. A landscape rationale is submitted along with details of green infrastructure. The landscaping proposals have been prepared in conjunction with the arborist's and engineering proposals for the site which demonstrates the integrated approach to the overall design of the scheme. Please refer to RMDA's enclosures for further details.

Given the infill nature and size of the site, being 0.3Ha (i.e. 0.75 of an acre), and in accordance with sections 8.7 and 12.6.10, and Tables 8.2 and 12.22 of the CDP, which require a minimum of 10% of the site area for new residential development on lands in other zones than RES-N, public open space is being provided at the minimum rate of 10% of the total site area i.e. 319sq.m.

In addition to the landscaping proposals, a tree and hedgerow survey has been carried out and is also submitted with this application for permission – please refer to same prepared by Arborists Associates.

5.5.2 Private Amenity Space

It is proposed that private amenity space for the proposed houses will be provided in the form of rear gardens located behind the rear building line of each dwelling. The orientation, relationship and separation of dwellings has been carefully considered to ensure that solar gain is maximized, overshadowing is minimized and overlooking does not occur. In this regard we note appropriate a minimum separation distances of 22 metres is



provided at first floor level between opposing dwellings for protection and privacy throughout the development such that privacy is ensured for future residents and existing neighbours.

The size of private rear gardens has been designed to comply with the minimum requirements of the County Development Plan (Table 3.20) i.e. 70sq.m per 4+ bed house. The area of private amenity space provided with respect to individual dwellings and relative to the minimum standards is illustrated on the proposed site layout plan (drawing no. 85675-PL2-004G) with all rear garden sizes stated – please refer to same. The proposed private rear garden areas are as follows:

- House No. 1 – 138sq.m;
- House No. 2 – 73.4sq.m;
- House No. 3 – 73.4sq.m;
- House No. 4 – 89sq.m;
- House No. 5 – 73.4sq.m;
- House No. 6 – 73.4sq.m;
- House No. 7 – 212.4sq.m.

5.7 Car and Bicycle Parking

Car parking for the proposed development is as follows:

Each house is afforded 2 no. car parking spaces, in the form of on-street spaces for house no.s 2-7 with car parking accommodated within the curtilage of house no. 1. It is intended that the car parking will be assigned / conveyed to the individual units / home owners.

As all of the houses are either detached or semi-detached, bicycle parking will be accommodated within the curtilage of the property, with all houses having side access to private rear gardens for secure parking.



6.0 Infrastructural Services

Proposals for the provision of services / infrastructure have been prepared by Downes & Associates Consulting Engineers and are described in the enclosed engineer's drawings and reports - please refer to same for further detail. However, set out in sections 6.1 - 6.4 below, is a summary of the infrastructural proposals.

6.1 Water Supply

6.1.1 Existing & Proposed Watermains and Connections

There is existing watermains in the immediate area, i.e. a 150mm diameter cast iron watermain (1932) along one side the Lucan Newlands Road.

A new local 25mm connection will serve the proposed development and will comply with the requirements of Irish Water. A new 100mm diameter MDPE water main will be provided along the proposed cul-de-sac access road and will comply with the requirements of Irish Water. This new watermain will be supplied from the existing 100mm diameter watermain along the Lucan Newlands Road. A new water meter will be provided outside each dwelling as per the requirements of Irish Water.

A Pre-Connection Enquiry was received from Irish Water in December 2021 under Ref. CDS21008497 which confirms that a water connection is feasible without infrastructure upgrade by Irish Water – a copy of same is included in the Appendices of the submitted infrastructural report prepared by Downes & Associates – please refer to same.

Please refer to Downes & Associates Drawing No. CLON-DOW-00-XX-DR-CE- 5001 for the proposed watermain layout.

6.2 Foul Sewerage

6.2.1 Existing Services

An existing 225mm diameter public foul sewer is located along the Lucan Newlands Road. This sewer falls by gravity in a north westerly direction along the Lucan Newlands Road towards Lucan village. There is an existing foul manhole located directly outside the site entrance on the Lucan Newlands Road.

6.2.2 Proposed Services

A Pre-Connection Enquiry was received from Irish Water in December 2021 under Ref. CDS21008497 which confirms that a wastewater connection is feasible without infrastructure upgrade by Irish Water – a copy of same is included in the Appendices of the submitted infrastructural report prepared by Downes & Associates – please refer to same.

Foul water will leave each new dwelling via a new network of underground pipes and fall by gravity via new connection to a new 225mm diameter sewer to be installed along the new access road in accordance with Irish Water requirements. This will ultimately discharge by gravity into the existing 225mm diameter foul sewer along the Lucan Newlands Road. The foul water drainage system for the proposed development will be separate to the surface water drainage system.



Please refer to Downes & Associates Drawing No. CLON-DOW-00-XX-DR-CE- 5001 for details of the proposed foul water layout.

6.3 Surface Water

6.3.1 Existing Services

An existing 225mm diameter surface water sewer is located along the Lucan Newlands Road and is separate from the foul sewer. An existing manhole approximately 50m west of the site appears to be the start of the surface water drainage run.

6.3.2 Proposed Services

Surface water will be collected from the building roofs by gutters, downpipes and underground surface water pipes. Driveway surfaces will generally comprise permeable construction to allow direct infiltration to ground while rear gardens will comprise permeable grass surfacing. The surface water drainage system for the proposed development will be separate to the foul water drainage system. Permeable Paving is proposed for use in each of the front driveway areas.

The proposed surface water drainage system has been designed in accordance with the policy requirements of the Greater Dublin Strategic Drainage Study (GSDS), incorporating surface water source control measures and Sustainable Drainage Systems (SuDS).

A mixture of permeable paving along with swales and water butts will cater for the surface water drainage associated with the proposed development.

Tree pits are also proposed for the street trees and the submitted RMDA landscaping drawings and details illustrate how the proposed engineering and landscaping proposals have been coordinated to ensure SUDs measures can be implemented.

Please refer to Downes & Associates Drawing No. CLON-DOW-00-XX-DR-CE- 5001 for details of the proposed surface water drainage proposals

6.4 Flood Risk Assessment

A flood risk to the site has been identified using available Preliminary Flood Risk Assessments. It is noted that the site is not at risk from Flood Zone A or Flood Zone B events. The proposed site can be considered as being within Flood Zone C.

In accordance with "The Planning Systems and Flood Risk Management: Guidelines for Planning Authorities November 2009" a sequential approach has been undertaken during the layout and design stage of the proposed development to ensure that the flooding risks to the proposed development are managed.

The proposed residential development is not classified as a highly vulnerable development. Highly vulnerable developments, such as the proposed development, at risk of Zone A and Zone B flooding require a Justification Test. Therefore, a Justification test is not required for the proposed development as based on the evidence outlined above, the development is considered to be located in Zone C, i.e. an area subject to a low probability of flooding.



7.0 Access and Roads

7.1 Access to the proposed development will be via an existing vehicular entrance into the site, that provides direct access onto the Esker Hill / Lucan Newlands Road. It is proposed to upgrade / improve the existing entrance to the site as per the details set out on the enclosed drawing no. 85675-PL2-042 "Entrance / Gates". The entrance to the adjoining dwelling at Clonard has a low stone butt wall with railing and it is proposed to replicate same at the entrance to the subject site, however, it should also be noted that it is not proposed that the subject development be gated.



Fig. 13 – Existing vehicular entrance serving Clonbrone, which is to be retained, but upgraded to serve the proposed dwellings

7.2 The proposed houses will be served by a single internal access road that will be a cul-de-sac. The main internal road is 4.8m wide, plus a 1.8m - 2m wide footpath to the front of the houses and a turning head for traffic, bin lorries etc.

7.3 A swept path analysis for refuse vehicles has been undertaken and is detailed on the submitted Downes & Associates drawing no. CLON DOW 00 XX DR CE. In addition, a swept path analysis for fire tender access has been undertaken and is detailed on the submitted Downes & Associates drawing no. CLON DOW 00 XX DR CE - please refer to both drawings. A Road Safety Audit has been prepared by Roadplan Consulting and is submitted with this current application – please refer to Appendix C of the submitted infrastructural report prepared by Downes & Associates Engineers.



8.0 Ecology

8.1 Ecological Impact Assessment

The applicant engaged the services of Enviroguide Consulting to carry out an Ecological Impact Assessment (EclA) of the proposed development and a copy of same is submitted as part of this application for permission. The EclA assesses the potential effects of the proposed development on habitats and species; particularly those protected by National and International legislation or considered to be of particular nature conservation importance. The EclA describes the ecology of the proposed development area, with emphasis on habitats, flora and fauna, and assesses the potential effects of the Construction and Operational Phases of the proposed development on these ecological receptors. The report follows Guidelines for Ecological Impact Assessment in the UK and Ireland, by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018). Please refer to the submitted EclA for full details.

The submitted EclA sets out a number of mitigation and enhancement measures and concludes that *“provided mitigation measures proposed are implemented and adhered to in full, there will be no significant negative impact to any valued habitats, designated sites or individual or group of species as a result of the proposed development. Based on the successful implementation of the mitigation measures, and proposed works to be carried out in accordance with current best practice and the landscape plan, there will be no significant ecological impact arising from construction and the day-to-day operation of the proposed development. The planting of a mix of native and non-native pollinator friendly species across the site, relocating existing habitats to new locations within the site, connecting the garden with Hedgehog Highways, and the installation of a number of bat boxes will all be of benefit to the long-term biodiversity on the site”*.

8.2 Bat Survey

Dr. Tina Aughney carried out a bat assessment of the subject site on behalf of Enviroguide Consulting and this assessment is enclosed as Appendix IV of the submitted EclA as referred to above – please refer to same. A bat survey of the property was undertaken on 12th July 2022 during the day to assess potential for bat foraging habitat and commuting routes. Dusk surveys were completed on the 12th and 18th July 2022 from 10 minutes before sunset to 110 minutes post sunset. The existing dwelling on site was also inspected on 12th July 2022 with bat droppings recorded in the attic space.

Five species of bat was recorded within the survey area: Leisler's bat, soprano pipistrelle, common pipistrelle, Daubenton's bat, brown long-eared bat and *Myotis* species (this species is likely to be Daubenton's bat). The first three species were recorded during both the bat detector surveys (i.e. dusk surveys) and static surveillance and bat activity levels were indicative, primarily, of commuting and foraging individuals. A small soprano pipistrelle Satellite Roost was recorded in the attic space of the dwelling house which will have contributed to the higher, on average level of bat activity of this species compared to all other bat species recorded. The latter two bat species (i.e. brown long-eared bat and Daubenton's bat) were recorded in a low level of bat passes on the static unit located adjacent to the wooded area.

Overall, the survey results demonstrate that bats (apart from soprano pipistrelles, which are roosting in the dwelling house) commuted to the proposed development site from a southerly direction and foraged, primarily along the boundary habitats and wooded area adjacent to the proposed development site.

The proposed development site is a small area and an overall low level of bat activity was recorded but a high bat biodiversity level was recorded. The results indicate that the boundary of the proposed development site with the wooded area is commuting and foraging habitat for local bat populations. However, this area is free from any new proposed construction and this area will not be impacted upon by the proposed development.



Due to the fact that bats are nocturnal mammals outdoor lighting will impact on local bat populations. The submitted bat assessment states that therefore, the lighting plan is an important element of the proposed development that needs to consider its potential impact on commuting and foraging bats. Consultation was undertaken and measures have been agreed to reduce this potential impact of outdoor lighting on commuting and foraging bats, especially lighting located adjacent to boundary habitats.

Dr Aughney states that *“there will be an increase in human activity (noise and light levels) (Operational Operations) as a result of the proposed development and due to the medium level of bat biodiversity and low bat activity, it is considered that this will impact on local bat populations. Therefore, the potential impact of the proposed development is, overall, considered to be Permanent Negative and to have a scale of impact of Slight to Moderate impact on named bat species (according to criteria set out in Tables 2c and d, Section 1.2.2). This is primarily in relation to the satellite roost for soprano pipistrelle and the lighting plan for the proposed development scheme and the presence of light-sensitive bat species”*.

The submitted bat assessment states that *“an NPWS Derogation Licence will be required in relation to the loss of a satellite roost for soprano pipistrelles. Alternative roosting has been mitigated with the provision of bat boxes. Bat mitigation measures are presented in order to reduce the potential impact of the lighting scheme for the proposed development with additional measures relating to tree felling and the erection of additional bat boxes. If the mitigation measures presented below are strictly implemented, the scale of impact is likely to be reduced to Permanent Slight Negative impact on local bat populations”*.

In addition to all of the foregoing, the report concludes that *“bat mitigation measures are presented in order to reduce the potential impact of the lighting scheme for the proposed development. If the mitigation measures presented above are strictly implemented, the scale of impact is likely to be reduced to Permanent Slight Negative impact on local bat populations”*.

8.3 Appropriate Assessment

Enviroguide Consulting has carried out an Appropriate Assessment Screening Report which is enclosed – please refer to same for further details. A summary of the screening report is as follows:

There are 4 no. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within a 15km distance radius of the subject site. The submitted AA Screening Report confirms that, in relation to the 3 no. SACs i.e. the Rye Water Valley / Carton SAC, Glenasmole Valley SAC and Wicklow Mountains SAC, *“there are no impact pathways present linking the Proposed Development and the habitats and species listed for these SACs. Rye Water Valley / Carton SAC is located upstream of the Proposed Development and thus has no hydrological connectivity to the Site. Additionally, both Glenasmole Valley SAC and Wicklow Mountains SAC are located in the Wicklow Mountains, upgradient from the Site and within a different river catchment. The intervening distances between the Site and the SACs are sufficient to exclude the possibility of significant effects on the SACs arising from: emissions of noise, dust, pollutants and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phases and associated emissions; potential increased lighting emitted from the Site during the Construction and Operational Phase; and increased human presence at the Site during the Construction and Operational Phase”*.

In relation to the South Dublin Bay and River Tolka Estuary SPA, the submitted AA Screening Report states that *“the hydrological pathways between the Site and this SPA are insignificant. Any surface water discharges that could potentially enter the river Liffey and eventually reach this SPA in Dublin Bay would be diluted to indiscernible levels within the receiving freshwater environment of the Liffey. Additionally, foul water from the Proposed Development will be treated at Ringsend WwTP. It is considered that effects on marine biodiversity and the European Sites within Dublin Bay from the current operation of Ringsend WwTP are unlikely (Irish Water 2018). Furthermore, given the intervening distance between the Site and the relevant European Sites, and the*



potential for dilution and dispersion of any spillage / leakage within the groundwater body, the possibility of significant effects on the European Sites within Dublin Bay arising from groundwater contamination can be excluded. In addition, the distance of 14.3km is sufficient to exclude the possibility of significant effects on the SPA arising from: emissions of noise, dust, and/or vibrations emitted from the Site during the Construction Phase; increased traffic volumes during the Construction and Operational Phases and associated emissions; potential increased lighting emitted from the Site during the Construction and Operational Phase; and increased human presence at the Site during the Construction and Operational Phase. The Site does not provide ex-situ habitat for the SCI species associated with this SPA”.

The AA Screening Report assesses the likely significant effects of the proposed development and its construction and operational phases of the proposed development as to whether it has the potential to have a negative impact on any of the qualifying interests and/or conservation objectives of the above named European Sites.

The submitted AA Screening Report states that the proposed development has been assessed to take into account:

- the nature, size and location of the proposed works and possible impacts arising from the construction works.
- the qualifying interests and conservation objectives of the European Sites
- the potential for in-combination effects arising from other plans and projects.

The AA Screening report concludes that *“upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that, on the basis of objective information; the possibility may be excluded that the Proposed Development will have a significant effect on any of the European Sites listed below:*

- *Wicklow Mountains SAC (002122)*
- *Glenasmole Valley SAC (001209)*
- *Rye Water Valley/Carton SAC (001398)*
- *South Dublin Bay and River Tolka Estuary SPA (004024)”.*

The submitted report concludes that *“based on the best scientific knowledge available, that the possibility of any significant effects on any European Sites, whether arising from the project itself or in combination with other plans and projects, **can be excluded**. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of a Natura Impact Statement (NIS) is not required”.*

9.0 Likely Significant Effects on the Environment

9.1 The proposed development is comprised of 7 no. dwellings, with associated site development works. Therefore, the preparation of an Environmental Impact Assessment Report (EIAR), which also constitutes an Environmental Impact Statement (EIS) for the purposes of the Planning and Development Act 2000, as amended, and the Planning and Development Regulations 2001 (as amended), does not form part of this application for the proposed residential development. The proposed development falls well below the threshold for environmental impact assessment as described at 10(b) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended).



10.0 Archaeology & Geology

Archaeology Plan has prepared the submitted Archaeological and Geological Heritage Impact Assessment report – please refer to same for details. The submitted report states that there is limited archaeological potential on the site, but there is risk of below ground archaeological remains due to the lack of disturbance site over the last 400 years. There is no above-ground evidence of archaeological features on the site and the closest excavations have not found archaeology.

The submitted report states that there is one ex-situ feature of Industrial Heritage on the site, possibly installed by George or more likely Richard, Shackleton in the years following the conversion of Anna Liffey Mills to rollers in the 1880s. Confirmation that they are French Buhr Stones has been provided by Niall Colfer and Fred Hamond (pers. comm.). It has been confirmed that that the "sundial" had milling origins, and that it is one of series of objects created by Mr Laddie Birnie, a former employee of Hills Mills (1860–1988) who passed away some years ago. It is proposed to retain the sundial on the site and to place same within the proposed public open space in the north-east part of the site and the submitted landscaping proposals affirm this.

In terms of geological potential on the subject site, the submitted impact assessment report states that the site is situated approximately 300m from the Esker Ridge, which is an important element of geological and historical heritage. However, despite nearby townland and housing estate names, the site is outside its current limits, on a low ridge overlooking the Lucan Road. The submitted report asserts that *“the development is considered unlikely to impact on any archaeology or geological heritage. It is outside the zone of archaeological constraint. However, without testing, the impact cannot be completely confirmed. The development will not have an impact on the Lucan Esker”*.

Please refer to the submitted Archaeological and Geological Heritage Impact Assessment report, which also includes mitigation measures, for full details.

11.0 Conclusion

11.1 This application for permission proposes the development of 7 no. dwellings on lands zoned objective RES: *“To protect and/or improve residential amenity”*, therefore, the principle of the proposed development is acceptable. The proposed development has been designed in accordance with the policies and objectives of the South Dublin County Development Plan, 2022-2028 in order to provide for traditional family housing that is compatible with the land use zoning objective attached to the site and maintains the established character of the receiving environs.

11.2 At present the subject site is occupied by a single dwelling in a suburban area for which there is no extant permission in place, therefore the proposal to provide for family type housing is considered an appropriate development proposal for this site.

11.3 A high quality of architecture has been applied to the scheme. While the elevational treatments are contemporary in nature, traditional materials are proposed, mainly brick which is in keeping with the character of the area. The proposed houses are large and will cater for family type living. The houses may be adapted in the future by home owners. Sufficient private open space has been provided thus catering for good quality, private residential amenity. The proposed dwellings are sufficiently separated from adjoining properties thus ensuring existing and future residential amenity for all.



11.4 The proposed development also seeks permission for the demolition of the existing dwelling and associated outbuildings on the site. At present this infill application site is underutilised but the proposed development allows for it to be opened up to the community, provide for much needed housing whilst also providing for an appropriate use and scale of development and an efficient use of zoned and serviced lands.

11.5 This application for permission, including all of the submitted documentation, has addressed the previous reasons for refusal issued under Ref. SD21A/0026, which we consider were items that could have been addressed by way of a request for Further Information. Pre-planning consultation has taken place twice with the Planning Authority regarding the subject site and the proposal to develop housing on same. Regard must also be paid to the lands within the control of the applicant, i.e. only those within the red line of application. We request that South Dublin County Council appreciates the sustainable and pragmatic scale of development being put forward for permission and to grant the permission being sought. Judicious consideration has been paid to the design of the proposed development, particularly in relation to its setting and impact on neighbouring properties.

11.6 We consider that the proposed development is a reasonable and appropriate proposal for the subject site, considering its size, the size and scale of other dwellings in the immediate environs, the SLO for the protection of views on the site to the west and the traditional pattern of development in this area. The proposed development will have no impact on any adjoining dwellings through its scale, sympathetic design and setbacks.

11.7 Having regard to the policies and objectives in the 2022 – 2028 South Dublin County Development Plan, along with guidance set out in the following:

- Housing for All – a New Housing Plan for Ireland (2021);
- the National Planning Framework (2018);
- the Design Manual for Urban Roads and Streets (DMURS) (2019);
the Guidelines for Sustainable Residential Developments in Urban Areas and the accompanying Urban Design Manual – a Best Practice Guide (2009);

along with the nature, scale and design of the proposed development and the pattern of existing and permitted development in the area, it is put forward that the proposed development accords with the proper planning and sustainable development of the area.

11.8 Judicious consideration has been paid to the previous planning decisions regarding the subject site, as well as the locational context of the site, in order to provide an appropriate form of residential development on the subject site. It is considered that based upon the size, location and configuration of the application site, that the current proposal caters for a high-quality development, creates a sense of place and is a good urban design response to the site.

11.9 Having regard to the policies and objectives of the Development Plan, the land use zoning of the site, the pattern of permitted development in the area, and the scale and design of the proposed development, it is put forward that the permission being sought is acceptable, will not impact on the character of the receiving environs, will have no impacts on existing residential amenity in the area and is in accordance with the proper planning and sustainable development of the area. Taking all of this into consideration, we request that South Dublin County Council grant the permission being sought.

A
We trust that the Planning Authority will give due consideration to the merits of this application, and we look forward to a favourable decision in due course.

Yours sincerely,



Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Armstrong Fenton Associates.

