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

Decision Order Number: 1404	Date of Decision: 07-Nov-2022
Register Reference: SD22A/0356	Registration Date: 12-Sep-2022

Applicant: Capami Ltd

Development: Development on a site located south of Oldcourt Road, which forms part of all overall permitted residential development granted under Ref. SD17A/0468 & has the approved name of Ballycullen Gate; The proposed development consists of changes of dwelling type and increase in unit number from 17 permitted houses to 24 proposed houses; The proposed dwellings are comprised of the following: 5 three bed detached bungalows; 1 two bed detached bungalow; 2 two bed semi-detached bungalows; 1 two storey, 4 bed, detached house; 1 two storey, 3 bed, detached house; 2 two storey, 2 bed, semi-detached houses & 12 two storey, 3 bed, semi-detached houses; The proposed development also includes for all associated site development works, car parking, open spaces, and landscaping, on a site area of c. 0.88 ha. The proposed development will have the effect of modifying extant permission Ref. SD17A/0468 which has an overall site area of 3.8 hectares.

Location: Oldcourt Road, Firhouse, Dublin 24.

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 12-Sep-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. The planning authority has concerns in relation to the proposed density of this amending application. Additional information is required to enable the planning authority to make an assessment on the matter of density. 2 no. drawing are requested that overlays the proposed layout of the scheme over

the landscape area (i) mid-slope and (ii) upper slope as identified in the LAP. The foregoing drawing should by means of the red line boundary identify the amending application and the parent permission and should provide a density calculation and clear methodology for same for the

Drawing number 1

(i) mid-slope landscape area for the development as a whole (parent and proposed amendment)

(ii) the upper slope landscape area for the development as a whole (parent and amendment)

Drawing number 2

(iii) mid-slope landscape area for the amendment as standalone

(iv) the upper slope landscape area for the amendment as a standalone

2. The applicant is requested to submit

1. The applicant shall submit a revised layout of not less than 1:200 scale which shows a formal two-way cycle and pedestrian connection that connects with the main link street and is designed in line with the Nation Cycle Manual standards.

2. The applicant shall submit a taking in charge drawing of not less than 1:200 scale which clearly shows the areas to be offered for taking in charge to South Dublin County Council.

3. (a) A report is requested showing surface water attenuation calculations for proposed development. Clarify what capacity there is in all attenuation systems being used. If an attenuation system is already being used by a different development submit design calculation of all development using such a surface water system. Surface water should be attenuation by means of SuDS (Sustainable Drainage Systems) first. Only where SuDS does not provide sufficient surface water attenuation and only in exceptional circumstances shall underground attenuation systems be considered of an arched type system.

Examples of SuDS and this is not an exhaustive list include:

- Green roofs or blue roofs
- Permeable Paving
- Grasscrete
- Swales
- Rain Gardens , Planter boxes Water Services Planning Report
- Filter drains
- Other such SuDS

Examples of SuDS can be found in South Dublin County Council Website at:
[sdcc-sustainable-drainage-explanatory-design-and-evaluation-guide.pdf](#)

Submit a drawing in plan and cross-sectional view showing design details of all proposed SuDS systems.

(b) A report and drawing is requested showing a flow route analyses of proposed site. A proposed SuDS system should take account of existing flow route of the site.

Examine how surface water flows can be managed at or above ground level.

Surface water discharge should be to green field run off rates or 2 litres/second/hectare whichever is greater.

4. Confirmation of feasibility letter from Irish Water for proposed development to South Dublin County Council is requested

5. The applicant is requested to submit the following:

(a) Landscape Design Proposals

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

- i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
- ii. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
- iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDS features including swales and integrated/bio-retention tree pits.
- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
- v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.
- vii. The applicant shall provide play and recreation opportunities for children and teenagers as appropriate to the scale and character of proposed development. Proposals shall be submitted in the form of a Proposed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using Nature-based Solutions. The Layout Plan shall comprise the following:-
showing types of play and play area(s),
target age groups,
landform (included levels and contours) and boundaries,
gates and planting,
design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface.
All play equipment and ancillaries shall conform to European Standards EN 1176 and EN 1177 Playground equipment and surfacing, and to BS/EN standards 2017/18 for Playground Installations for HIC (Head Injury Criterion) and CFH (Critical Fall Height).

(b) Existing Trees and Hedgerows

The applicant is requested to submit an updated comprehensive Tree Report for the proposed development site to the SDCC Public Realm Section. This shall comprise of detailed Tree Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:

- (i) Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling

distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site

(ii) Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy.

(iii) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).

(iv) Design Iteration- Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate

(v) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.

(vi) Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.

(vii) Arboricultural Method Statement: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.

(viii) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.

(ix) The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.

(x) Arborist's name, arboricultural qualifications and contact details.

(xi) Date that the survey was carried out (surveys > 12 months are unacceptable).

(c) OPEN SPACE PROVISION

Insufficient information has been submitted in relation to proposed open space provision with the Development. Under section 8.7.3 of the 2022-2028 CDP the overall standard for public open space is 2.4 hectares per 1,000 population. This will be applied to all developments with a residential element, such as the subject proposal. Within that standard, there are specified percentages as set out in Table 8.2 which must, as a minimum, be provided on site. Under Table 8.2 the specified percentage of open space for the proposed development is a minimum of 15% of the site area. The applicant is therefore requested to provide in tabular form a clear breakdown of the open space provision within the proposed development. If the applicant intends to provide the full public open space onsite, a significant redesign of the open space is required. This space should be of a higher quality, easily accessible from the public realm, pedestrian and cyclist permeable, contribute to biodiversity etc. A taking in charge drawing shall be provided showing proposed areas of public open space as part of the applicant's response

(d) SUDS

There is a lack of information in terms of the SuDS (Sustainable Drainage Systems) features planned for the proposed development. The applicant is requested to submit the following:

(i) A drawing to show how surface water shall be attenuated to greenfield run off rates.

(ii) Submit a drawing to show what SuDS (Sustainable Drainage Systems) are proposed. Examples of SuDS include permeable paving, filter drain, bio-retention tree pits, rains gardens, swales or other such SuDS.

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

(iv) Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should provide the following:

a. Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

b. Tree pits incorporating SUDS features should include a deep cellular water storage/attenuation area below the surface which acts as a soak away allowing surface water to infiltrate into the ground

c. It is unclear how much attenuation in total is provided by the proposed bioretention tree pits for the development. The applicant shall submit a report and drawing showing how much surface water attenuation in m³ is provided for the development.

d. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

e. The applicant is requested to submit a Landscape and SUDS Management and Maintenance Plan including long term design objectives, management responsibilities and maintenance schedules for all landscape areas and proposed SUDS features for the approval of the Public Realm Section.

f. Underground attenuation tanks are only permitted in exceptional circumstances and where all other natural SUDS measures have been utilised. If all other methods have been utilised and it is demonstrated that underground attenuation is required, it cannot be proposed under public open space areas and such areas will not be taken in charge by Public Realm. SUDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity function.

(e) Green Infrastructure

The applicant is requested to submit a Green Infrastructure Plan which shall be submitted as part of the suite of Landscape Plans that are required for a development. The Green infrastructure Plans should include the following information:

Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County.

Site survey and analysis, identifying existing GI Infrastructure and key assets within the site.

Indicate how the development proposals link to and enhance the wider GI Network of the County.

Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.

Proposals for identification and control of invasive species where appropriate, for the site

(f) Ecology

The applicant shall provide information as to the ecology present on site and potential impacts of the development and proposed mitigation measures. The applicant is requested to undertake a comprehensive ecological survey of the site to ascertain if any protected species are present. The results of the survey shall be submitted with details of the provision and implementation of ecological mitigation to protect any protected species if found to be present.

(g) Green Space Factor (GSF)

A Green Space Factor (GSF) Worksheet shall be submitted by the applicant for the proposed

development detailing how they have achieved the appropriate the minimum Green Space Factor (GSF) scoring established by their land use zoning. Minimum required scores for different land use zonings are included in Table 1 below.

Table 1: Minimum Green Space Factor Scores for Land Use Zonings.

Zoning	Minimum Score
Res	0.5
RES-N	0.5
SDZ	0.5
REGEN	0.5
TC 0.5	
DC 0.5	
VC 0.5	
MRC	0.5
LC 0.5	
EE 0.5	
RW	0.5
HA-DM	0.7
HA-LV	0.7
HA-DV	0.7
OS 0.7	
RU 0.7	

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

Street trees shall be provided fully in Public Realm areas and not within private or management company driveways and include SUDS features. All streets should be tree lined and include SUDS tree pits. DMURs requires street trees every 14-20 m along streets, and this has not been achieved. A specific street tree planting plan should be submitted for agreement with the Public Realm.

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

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

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

Signed on behalf of South Dublin County Council

Register Reference: SD22A/0356

Date: 09-Nov-2022

Yours faithfully,

Pamela Hughes
for **Senior Planner**