



25th November 2022.

Land Use, Planning & Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC

Land Use Planning & Transportation

28 NOV 2022

South Dublin County Council

Re:

Permission sought for a mixed use & residential development on a site area of 6.3Ha, within the Clonburris Strategic Development Zone (SDZ) and in the townland of Cappagh, Dublin 22.

ADDITIONAL INFORMATION

REG. REF. SDZ22A/0010

Dear Sir/Madam,

1.0 Introduction

On behalf of our client, Kelland Homes Ltd, we wish to respond to your letter dated 29th August 2022, requesting Additional Information (hereafter "AI") in respect of a proposed development, under planning application Ref. SDZ22A/0010, in respect of a proposed development located within the Clonburris Strategic Development Zone (SDZ), and specifically within the development areas of (i) Clonburris South East (i.e. CSE-S1 & CSE-S2) and (ii) part of Clonburris Urban Centre (i.e. CUC-S4), as identified in the Clonburris SDZ Planning Scheme 2019. Our response to same is set out below. It should also be noted that in responding to the request for AI, the development proposed has been amended and therefore the permission being sought can now be described as follows:

Kelland Homes Ltd. intends to apply for permission for development on a site area of 6.3Ha, on lands within the townland of Cappagh, Dublin 22. The proposed development is located west of the Ninth Lock Road, south of the Dublin-Cork railway line, north of Cappaghmore housing estate and Whitton Avenue, and east of an existing carpark / park & ride facility at the Clondalkin Fonthill train station and the R113 (Fonthill Road). The proposed development is located within the Clonburris Strategic Development Zone (SDZ), within the development areas of (i) Clonburris South East (i.e. CSE-S1 & CSE-S2) and (ii) part of Clonburris Urban Centre (i.e. CUC-S4), as identified in the Clonburris SDZ Planning Scheme 2019.

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The proposed development consists of the construction of 283 no. dwellings, crèche and 2 no. retail / commercial units. The proposed residential dwellings are comprised of (i) 112 no. 2, 3 & 4 bed, 2 storey semi-detached and terraced houses, (ii) 110 no. 1, 2 & 3 bed duplex units accommodated in 11 no. 3 storey buildings, and (iii) 61 no. 1 & 2 bedroom apartments accommodated in 2 no. apartment buildings (i.e. Block A is a 3-6 storey building & Block B is a 4 storey building). The ground floor of Block A accommodates a retail/commercial unit (c.325sq.m) and a creche (c.599sq.m). 1 no. retail/commercial unit is also proposed at ground & first floor level of Block K (totalling c.152sq.m).

Access to the development will be via the permitted road network (under Ref. SDZ20A/0021) which provides access from the Ninth Lock Road to the east and the R113 (Fonthill Road) to the west. The proposed development will connect into the permitted infrastructural works as approved under the Clonburris Strategic Development Zone Planning Scheme (2019) and permitted under Ref. SDZ20A/0021, with the proposed development connecting into the permitted surface water drainage attenuation systems i.e. 1 no. pond, 3 no. modular underground storage systems and 1 no. detention basin combined with modular underground storage systems. The proposed wastewater infrastructure will connect into a permitted foul pumping station and pipe network within proposed road corridors to facilitate drainage connections to future wastewater drainage infrastructure within the adjoining SDZ lands (including future Irish Water pumping station permitted under SDZ21A/0006).

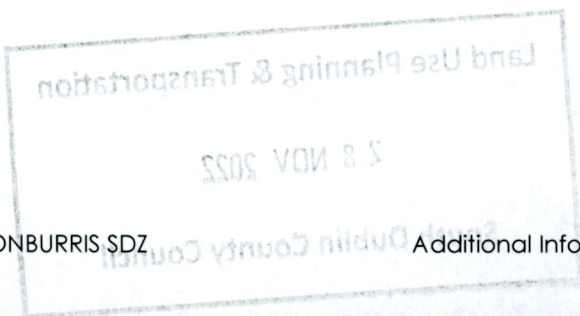
The proposed development also provides for all associated site development works above and below ground, public & communal open spaces, hard & soft landscaping and boundary treatments, surface car parking, bicycle parking, bin & bicycle storage, signage, public lighting, plant (M&E), utility services & 5 no. ESB sub-stations.

2.0 Relevant Information:

2.1 In addition to responding to all of the items that require Additional Information, as individually set out and responded to overleaf, we wish to confirm some matters that were not specifically set out in the AI request but that are relevant to the proposed development and in assessing this AI response, namely:

2.2 The application site / our client's land holding both accommodate permitted infrastructure including the main east-west link street and drainage infrastructure including attenuation tanks and pond permitted under Ref. SDZ20A/0021. None of the aforementioned permitted infrastructure is to be altered by way of this current proposed development. The applicant is very conscious of the existing north-south hedgerow that runs through the central open space in sub-sector CSE-S1 and this application for permission seeks to retain same. The submitted Tree Protection Plan prepared by Arborist Associates confirms that the existing north-south hedgerow/treeline will be retained. Kelland Homes Ltd will ensure that this hedgerow/treeline will be protected with the necessary measures put in place on site to ensure its retention. They are currently working closely / liaising with the appointed contractors and project managers who are carrying out the aforementioned permitted infrastructural works on Kelland Homes lands to ensure that this hedgerow will be retained.

2.3 It should also be noted that updated public lighting plans / details have been prepared and are also submitted – please refer to same prepared by Redmond Analytical.





3.0 Additional Information Response:

The following sets out the items that require AI and our response to same.

1. Layout & Design

The Planning Authority has concerns in relation to the proposed layout and design of the western part of the site as well as the eastern entrance to the site.

1A In relation to the Clonburris Urban Centre the following should be revised or detailed:

- (a) Housing with lower densities than what would have been envisioned for this development area is proposed. Higher density and mixed use development should be explored in the CUC-S4 area of the site.*

Response:

The application site straddles two separate "Development Areas" of the SDZ Planning Scheme:

- i. Part of Development Area 1 – Clonburris Urban Centre i.e. part of sub-sector CUC-S4;
- ii. Development Area 2 – Clonburris South East i.e. sub-sectors CSE-S1 and CSE-S2.

The Development Area of Clonburris Urban Centre is sub-divided into 4 separate sub-sectors i.e. CUC-S1, CUC-S2, CUC-S3 and CUC-S4, as per the SDZ Planning Scheme, which combined, account for a net developable area of 17.9Ha, that is envisaged to accommodate 1,938 no. dwellings, as well as retail and non-retail commercial development, according to the SDZ Planning Scheme.

The subject application site lies within sub-sector CUC-S4 but does not occupy all of that sub-sector due to the applicant's landownership. Abutting the application site to the west/north-west and within CUC-S4, but in third party ownership is the existing park and ride facility. Approx. 1.7Ha can be discounted from the overall net development area of CUC-S4 which lies outside the application site, thus leaving approx. 1.85Ha of sub-sector CUC-S4 within the application site (Note: Table 2.13.1 of the SDZ Planning Scheme states that CUC-S4 has a net area of 3.82Ha).

Section 2.1.5 of the Planning Scheme sets out the density margins within the Development Areas, while development within each Sub Sector shall be consistent with the density margins set out in Table 2.1.8 of the Planning Scheme.

According to the Planning Scheme, in the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph). The lower end of each of the density margins represents the minimum densities achievable and the upper end of each of the density margins represents the maximum densities achievable in each Sub Sector.

Residential densities shall be calculated on the basis of Net Development Area as described under Section 2.1.4 (Extent of Development).



Development Area	Sub Sector	Net Density Margin per Ha.	
		MIN.	MAX.
Clonburriss Urban Centre (CUC)	S1	65	150
	S2	73	150
	S3	65	150
	S4	67	150

Fig. 1 – Extract from Table 2.1.8 “Density Margin per Sub Sector” of the Planning Scheme, with the subject site being located within part of sub-sector S4, as highlighted in red on the table.

The portion of the proposed development / application site that is included in CUC-S4 has been revised to provide for an increased density and mix of uses. The terraced housing types that are proposed in this area are integrated into a tight knit urban format that scales up in both volume and density towards the public plaza. Fig. 2 below illustrates the part of the application site that lies within the “Clonburriss Urban Centre” of the SDZ Planning Scheme. Due to the revised proposals now put forward for permission, it is proposed to accommodate the following residential units within CUC-S4:

- 34 no. houses,
- 22 no. duplex units,
- 50 no. apartments,
- Total = 95 no. units.

It should be noted that the 95 no. units are to be delivered on a net site area of 1.85Ha. It should be noted that an enlarged plaza area that is also located in the south-west corner of this part of the application site, as requested under item 1(b). The enlarged plaza occupies an area of c.1,884sq.m. If one also discounts this area from the net developable area, therefore the net resultant developable area is 1.66Ha. The proposed development of 95 no. units produces a net density is 57 no. units per hectare.

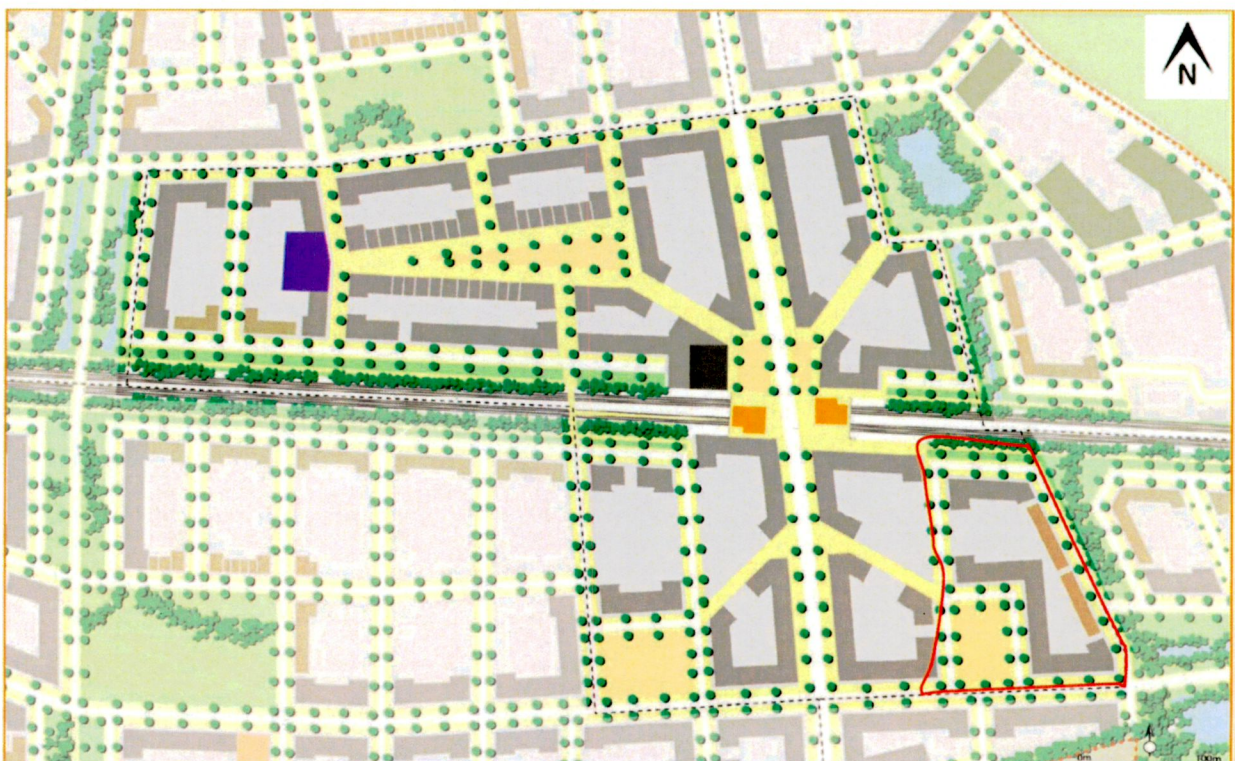


Fig. 2 - Extract from Figure 3.3.3 “Clonburriss Urban Centre” of the Planning Scheme, with part of the subject application site indicatively outlined in red.



It is put forward that cognisance must be paid to the fact that the applicant is not in control of all of the lands contained in CUC-S4, however, a feasibility has been undertaken to examine how the remaining lands in CUC-S4 could be developed in accordance with the SDZ Planning Scheme. In addition, the portion of the application site within CUC-S4 represents c.55% of the net developable area of CUC-S4 and therefore, there is appropriate headroom within the adjoining CUC-S4 lands to accommodate residential development, closer to the train station, that combined with the current proposal, can facilitate the target density range for this sub-sector of 67-150 no. units per hectare net.

The aforementioned feasibility (and current proposal) includes an enlarged public plaza with urban massing concentrated around the perimeter of the plaza. The following three images (Fig.s 3-5) illustrate the current proposal alongside the remainder of the CUC-S4 sector to the immediate west, abutting the Fonthill Road, as well as the east-west link street and Clonburris South East (both sub-sectors CSE-S1 and CSE-S2) to the east, lying both north and south of the main link street. Please also refer to the enclosed Davey+Smith drawing no. 2004-PL-003 "Proposed Site Plan with Masterplan" which illustrates the proposed site layout plan alongside the indicative masterplan.

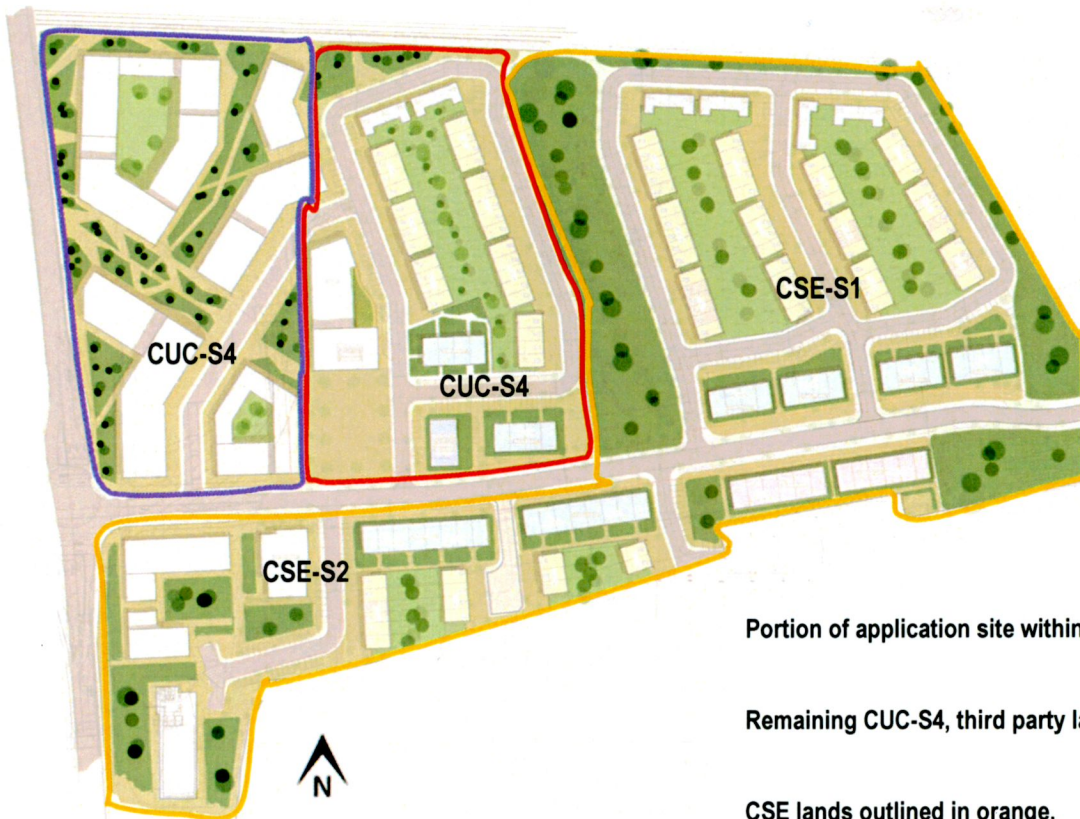


Fig. 3 – Indicative feasibility for entire CUC-S4 lands.

Portion of application site within CUC-S4 outlined in red.

Remaining CUC-S4, third party lands, outlined in purple.

CSE lands outlined in orange.

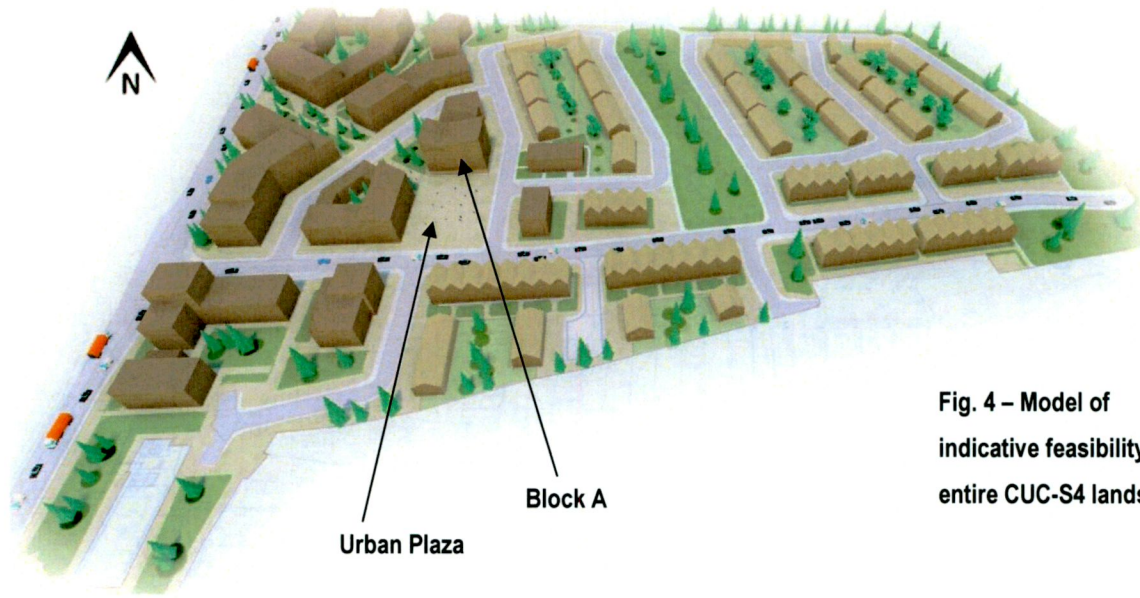


Fig. 4 – Model of indicative feasibility for entire CUC-S4 lands



Fig. 5 – Model of indicative feasibility for entire CUC-S4 lands

The proposed revised layout has also been considered in the context of the masterplan for the adjacent remaining CUC-S4 lands that lie outside the applicant's ownership. The feasibility demonstrates that the target density for the CUC-S4 lands can be comfortably achieved with the revised proposal and without relying on excessive height - i.e. not greater than 6 storeys.

The above Figs 4 and 5 are massing models with a view looking north across the site. The third party lands to the west/north-west of the application site is included on the model representing the extent of the CUC-S4 area of the SDZ lands. A gradually increasing volume and density is proposed from the public open space park to the east towards the Urban Plaza and the Fonthill Road to the west. It is proposed that this graduation in scale delivers appropriate characteristics to defined open spaces while also delivering target density - i.e. lower density fronting to public parkland, graduating up to higher density fronting onto Urban Plaza and closer to the train station, thus meeting the density parameters of the SDZ Planning Scheme for CUC-S4.



Based on the proposed modelling, a potential net density of 85-90 units per hectare for the CUC 4 lands can be achieved. This is comprised of the proposed 95 no. dwellings on the current application site contained in the applicant's part/ownership of CUC-S4, and c.235 units on the adjacent third party lands to the west. It is envisaged that a quantum of 5,300sq.m of non-residential space [community and employment] can also be provided across the shared landholding.

The SDZ Planning Scheme sets out that sub sector CUC-S4 has a density range of 67-150 units per hectare. As outlined above, the subject application site does not occupy all of sub-sector CUC-S4 due to ownership. The proposed density range within the part of the subject application site that is within CUC-S4 is c.57 units per hectare net, (which accords with the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, and section 5.8 of the same which recommends that "*increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station*"), however, the above feasibility sets out that the required density range for all of CUC-S4 i.e. of 85-90 units per hectare, which is within the required density range of 67-150 units per hectare, can be met, with the submitted feasibility outlining that c.235 no. units can be accommodated on the remainder of the CUC-S4 lands, resulting in an overall density (i.e. that currently proposed as part of this application combined with the feasibility for the adjoining lands within CUC-S4) of c. 85-90 units per hectare.

It is also noted that this is the first development proposal within the Clonburris Urban Centre, with further proposals to follow in the future. The Applicant also controls additional lands within Clonburris Urban Centre Development Area, i.e. Sub-Sector CUC-S2 to the north, with further sub-sectors to the west in separate ownership/control, that are all likely to be the subject of future planning applications for development, which will be required to accord with the standards of the SDZ Planning Scheme.

As outlined above, within CUC-S4, the current proposal provides for 95 no. dwellings comprised of

- 34 no. houses (36%),
- 22 no. duplex units (23%),
- 50 no. apartments (53%).

Traditional housing comprises circa a third of the housing mix in this area with higher density units proposed. In addition, a creche (c.599m²) and a retail /commercial unit (c.325m²) are proposed, both co-located at the southern end of Block A, addressing the now enlarged urban plaza. These non-residential uses have been increased in floor area from that initially proposed (i.e. creche (c.520.2m²) & retail /commercial unit (c.152.1m²)). Furthermore, a new building, Block K, is proposed to the south-east of Block A and east of the proposed plaza, which accommodates a 2 storey commercial / retail unit of c. 152m². Overall, the proposed commercial/retail floorspace has been increased by 325m², and the location of same are adjacent to the proposed plaza, with the creche also being increased by 79m².



(b) The proposed plaza and surrounding block form should be significantly redesigned in line with the Design Criteria in Table 2.10.3 of the Planning Scheme. A detailed design of the plaza should be submitted, including how it would connect with the remainder of the Clonburris Urban Centre and wider area as indicated in the Planning Scheme. The plaza should be enclosed on more than one side.

Pedestrian and cyclist permeability and connections from the plaza need to be further considered.

Further green infrastructure and SUDS should also be incorporated. The external space associated with the creche should be relocated elsewhere, so that the ground floor of the northern block is level onto the plaza. A cross section should be provided of the retail/commercial unit onto the plaza.

Response:

It can be seen from the submitted feasibility that a proposed street connection from the plaza / subject application site to the western side of CUC-S4 can be created via a looped link street that would pass the proposed creche and retail/commercial unit in Block A. Development on the western part of the CUC-S4 lands could be configured with enclosed private courtyard parks over basement parking. A diagonal street leading from the plaza toward the train station can be accommodated, catering for pedestrian and cyclist accessibility, in the manner as suggested within the masterplan layout contained in the SDZ Planning Scheme.

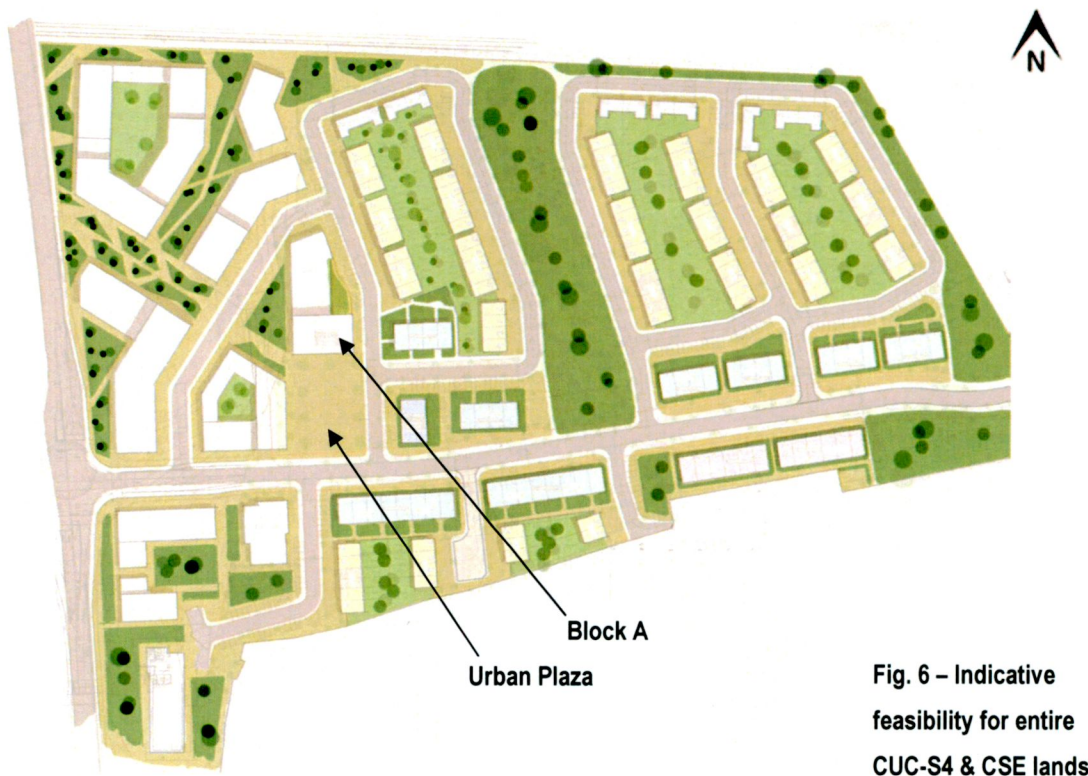


Fig. 6 – Indicative feasibility for entire CUC-S4 & CSE lands

Please refer to both the submitted site layout plan (Davey-Smith drawing no. 2004-PL-002) and landscape masterplan (RMDA Landscape Plan, drawing no. 01LP), as well as RMDA Landscape Detail Plans (drawing no.s 04(i) & (ii)) which illustrate that the proposed urban plaza in the south-west part of the site has been increased. The proposed plaza occupies an area of c.1,884m², which is an increase of 768m² from the initial proposal of c.1,116m².



The design rationale for this plaza has taken into account the required components of Table 2.10.3 of the SDZ Planning Scheme "Design Criteria for Urban Squares" and includes:

- A continuous surface with a comfortable gradient;
- An uncluttered space free of permanent features;
- High quality surface design and materials;
- High quality tree line and street furniture provided along the edges to define the plaza;
- Seating at edges;
- The ground floor commercial use of the proposed Block A to the immediate north is level with the plaza and opens directly onto the public space;
- The creche has been relocated to the rear of the block facing onto the plaza and has its own secure, designated outdoor play space, and street access separate from the public realm;
- The residential units to be accommodated in the upper floors of Block A will have direct passive supervision over the plaza;
- The proposed plaza will form part of the public realm, being open on its southern side but also catering for a direct visual connection with its immediate environs and thus affording 24 hour access;
- It is envisaged that the location, size and design of the plaza can cater for a range of activities such as farmers market, craft market, evening entertainment etc.

Please refer to the specific details of materials and planting set out on the enclosed landscaping plan for this plaza for more details – refer to RMDA Landscape Plan, drawing no. 01LP, as well as RMDA Landscape Detail Plans (drawing no.s 04(i) & (ii)).

The location of the proposed plaza in the south-west corner is as per the SDZ Planning Scheme (refer to Figure 3.3.3 of same) however, it is adjacent to (i) the existing park and ride facility to the west, and (ii) the main access route to this part of the SDZ to the south (i.e. the permitted east-west main link street (under Ref. SDZ20A/0021) which provides access from the Ninth Lock Road to the east and the R113 (Fonthill Road) to the west). Access is also required to serve the adjoining proposed dwellings to the east and therefore as part of this application for permission and based upon the aforementioned landownerships, the plaza is currently enclosed on its north side, with frontage from Block K also catered for on its eastern side, however, the submitted feasibility illustrates how the adjoining lands to the west can be developed and provide further enclosure of the plaza. The proposed development does not preclude future further enclosure of the plaza, as illustrated in the submitted feasibility. The orientation and position of the space, being south facing and having openings on its southern and eastern sides will allow for an abundance of natural light to spill into this area thus maximizing its amenity and thereby usage. However, we would refer the reader to the aforementioned feasibility prepared for all of the CUC-S4 lands which illustrates that there is potential for the plaza to be further enclosed on its western side.

Please also refer to the enclosed Davey+Smith drawing no.s 2004-PL-004 & 2004-PL-005 which provide cross sections of the retail/commercial units onto the plaza area. The submitted Davey+Smith architectural design statement also includes 3D images of what the plaza space will look like – please refer to same.

In designing the proposed urban plaza, design considerations such as pedestrian and cyclist permeability and connections to and from the plaza have been applied to the layout. It is considered that proposed plaza will act as local urban node / focal point in both the context of the proposed development and further in the context of the adjoining site, should the entire CUC S4 lands be developed in time.



(c) The level of commercial/retail floorspace should be increased or at least further facilitated in the future through the provision of flexible designs, including the development onto the proposed plaza.

Response:

The development as initially applied for proposed a 2 storey creche (c.520.2m²) and a 2 storey retail /commercial unit (c.152.1m²), both co-located at the southern end of Block A.

The proposed development has now been revised whereby Block A has been redesigned whereby at ground floor level a creche of c.599m² and a commercial / retail unit of c.325m² are proposed.

In addition, a new building, Block K is proposed to the south-east of Block A and east of the proposed plaza, which accommodates a 2 storey commercial / retail unit of c. 152m². The proposed commercial / retail units are of a sufficient size to allow for flexibility and subdivision, if required in the future, subject to permission for same.

Overall, the proposed commercial/retail floorspace has been increased by 325m², and the location of both units are adjacent to the proposed plaza.

We also note that the submitted feasibility includes a quantum of c.5,300sq.m of non-residential space [community, retail and employment uses] would be provided across all of CUC-S4, the shared landholding, which is within the required quantum of the SDZ Planning Scheme, namely Table 2.13.1.

(d) Master planning of how the proposal would integrate with the Planning Scheme and help deliver the rest of the Clonburris Urban Centre is required. The potential future development of the remainder of the CUC-S4 and CSE-S2 subsectors should be indicated. This indicative masterplan should indicate potential future:

- Block form and layout
- Connections and pedestrian and cyclist permeability
- How the remainder of the CUC and CSE subsectors would achieve the required densities, target no. of units, retail floorspace, commercial non-retail floorspace, and public open space.
- In the short term, how the proposal integrates with the existing western lands, including the park and ride and pumping station.

Response:

Davey-Smith Architects have prepared an indicative masterplan of how the proposed development can integrate with the adjoining third party lands within the SDZ, including setting out how the proposed development can be combined with future possible development on the adjoining lands within the CUC-S4 and CSE subsectors, as illustrated in Figs 3, 6 & 7. Fig. 6 incorporates the remaining CUC-S4 lands to the immediate west/north-west of the subject site and the remaining CSE lands to the west/south-west of the application site, while Fig. 7 illustrates a model of what the remainder of the CUC-S4 and CSE-S2 lands could be developed in terms of volume and building height. Please note that these areas are outside of the ownership/control of the applicant and are indicative only, but represent what could be delivered on these land parcels having regard to the requirements/standards of the SDZ Planning Scheme. It should also be noted that the feasibility in Fig. 6 has taken into consideration how the proposal integrates with the existing lands to the west, including the park and ride facility, and the pumping station, as also illustrated in Fig. 7 below.

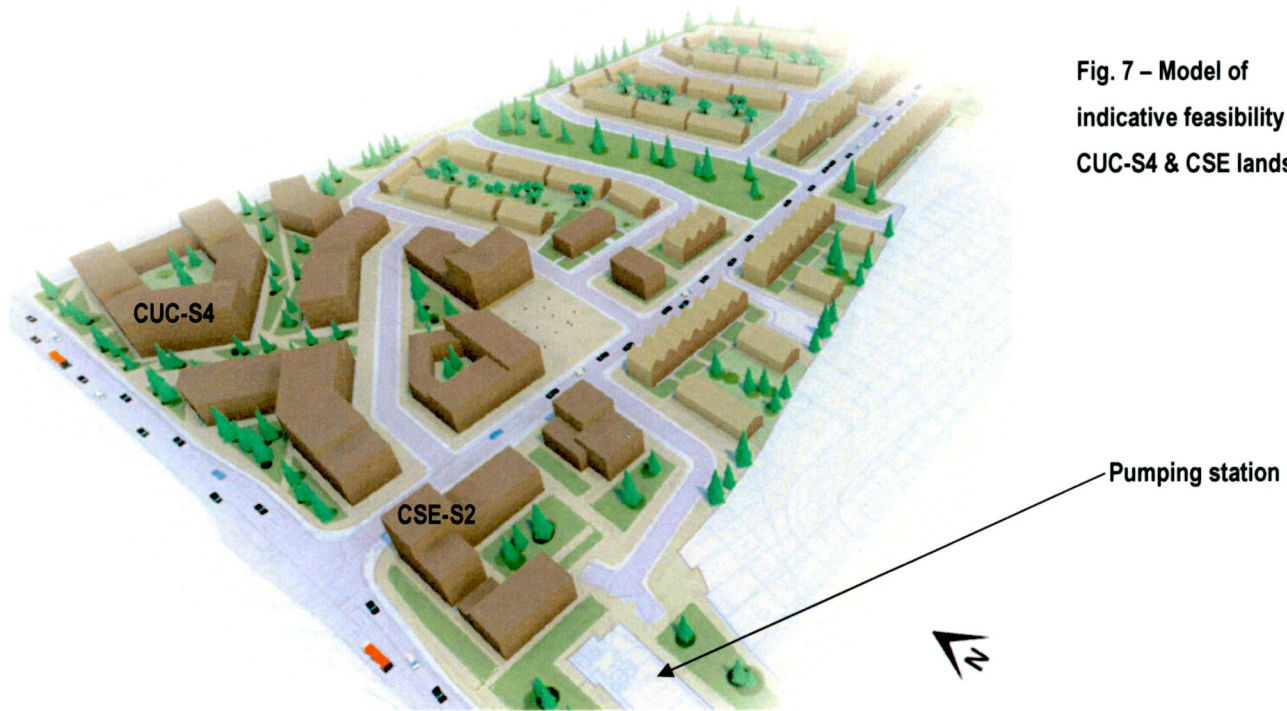


Fig. 7 – Model of indicative feasibility for CUC-S4 & CSE lands

For the remainder of the CUC-S4 lands, the masterplan takes into consideration a block form and layout that will knit together with the proposed application to provide a coherent urban form that directly reflects the design intent as set out in the Planning Scheme for this area. The submitted feasibility sets out that the remaining CUC-S4 lands can accommodate c.235 no. units in a series of buildings that would range in height from 3-4-5-6 storeys. This, combined with the current proposal of 95 no. units on CUC-S4 lands provides for a density range of 67-150 units per hectare, which accords with required density range of 67-150 units per hectare, as set out in the SDZ Planning Scheme.

Fig. 7 above is a massing model with a view looking north across the site. The third party lands to the west of the application site are included on the model representing the extent of the CUC-S4 and CSE-S2 sectors of the SDZ lands. A gradually increasing volume and density is proposed from the central public open space park to the east (included in the subject application site) towards the Urban Plaza and the Fonthill Road to the west. It is proposed that this graduation in scale delivers appropriate characteristics to defined open spaces while also delivering target density - i.e. lower density fronting onto public parkland and then graduating up to higher density fronting onto the Urban Plaza and closer to the train station, thus meeting the density parameters of the SDZ Planning Scheme for CUC-S4.

The feasibility allows for street connections from the application site to the adjoining third party lands to the west, thus connecting to the western section via a looped link street that would pass the proposed Block A at its south-western corner, moving north-westwards into the adjoining lands. The feasibility layout allows for the urban plaza to be further enclosed on its western side, but the indicative site layout plan allows a visual connection from the adjoining third party lands to the plaza thus drawing pedestrians and cyclists into the space that will act as a nodal point within CUC-S4. A diagonal street leading from the plaza toward the train station can be accommodated in this manner as suggested within the SDZ masterplan layout. Development on the western part of the lands could also be configured with enclosed private courtyard parks over basement parking.



Fig. 8 – Current aerial view of CUC-S4 lands including the existing park & ride facility.

In relation to sector CSE and its sub-sectors CSE-S1 and CSE-S2, Table 3.3.2 of the SDZ Planning Scheme states that Clonburris South East (CSE) is to be a development area with medium density residential development close to the main Urban Centre, with the following density ranges:

Net Density	Sub Sector	Density Range
	CSE-S1	51-61
	CSE-S2	65-75

Fig. 9 – Extract from Table 3.3.2 “Clonburris South East” of the Planning Scheme.

Table 2.13.1 of the Planning Scheme provides a summary of the quantitative parameters contained within the Planning Scheme. For the purposes of the subject application, table 1 below shows the relevant targets for the application site.

Development Area	Sub - Sector	Net Area (Ha)	Average Net Density (Low)	Average Net Density (High)	Total No. Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)
Clonburris South East	CSE-S1	2.17	51	61	111	122	132
Clonburris South East	CSE-S2	1.13	65	75	73	79	85

Table 1 – Extract from Table 2.13.1 “Development Areas in Clonburris and Sub Sectors”.



CSE-S1:

- Total dwellings (low margin) – 111
- Total dwellings (high margin) – 132
- Total dwellings (target) – 122

CSE-S2:

- Total dwellings (low margin) – 73
- Total dwellings (high margin) – 85
- Total dwellings (target) – 79

The part of the application site that lies within Clonburris South East proposes to develop 188 no. dwellings across both sub-sectors (CSE-S1 = 141 no. units + CSE-S2 = 47 no. units) which is within the combined total dwellings low and high margins (i.e. combined low margin for both sub-sectors = 184 no. dwellings & combined high margin for both sub-sectors = 217 no. dwellings), therefore meeting the target dwelling numbers for this Development Area as set out in the Planning Scheme.

There is headroom on the remaining adjoining lands in CSE-S2 to accommodate an additional c.29-38 no. units in line with both the target and high margin respectively as set out in Table 2.13.1. The submitted feasibility illustrates that on the adjoining CSE-S2 lands to the west, that an apartment type / duplex type building arrangement can be accommodated at the junction of the Fonthill Road with the main link street, of similar scale and height as the current proposed Block B.

The proposed development has now been revised whereby Block A has been redesigned whereby at ground floor level a creche of c.599m² and a commercial / retail unit of c.325m² are proposed. In addition, a new building (Block K) is proposed to the south-east of Block A and east of the proposed plaza, which accommodates a 2 storey commercial / retail unit of c. 152m². The proposed commercial / retail units are of a sufficient size to allow for flexibility and subdivision, if required in the future, subject to permission for same. The submitted feasibility includes a quantum of c.5,300sq.m of non-residential space [community, retail and employment uses] would be provided across all of CUC-S4 i.e. the shared landholding, which is within the required quantum of the SDZ Planning Scheme, namely Table 2.13.1. The existence of the pumping station will not impact the delivery of the required quantum of development and has been fully considered as part of the feasibility undertaken.

As required by this AI request, the applicant has increased the size of the urban plaza and enclosed same on its northern side by Block A, with the proposed ground floor commercial/retail unit directly addressing same. The enclosed feasibility allows for further enclosure on the western side of the proposed plaza in the future, i.e. on third party lands, as well as connections to the lands to the west. In the short term, the proposed development provides for a 1.2m high boundary treatment comprises of a 0.6m butt wall with bow top railing and hedgerow planting inside same along the north-western boundary of the application site. To the immediate west of the urban plaza, within the application site, it is proposed to provide planting and all of these details are provided on the submitted Davey+Smith drawings and RMDA landscaping proposals – please refer to same. In essence, a soft and open boundary treatment / interface is proposed along the north-western boundary of the proposed development that will (a) define and enclose the development in the short term but (b) allow for integration with future development to the west in the future, and not inhibit same.



Fig. 10 – 3D image of the proposed plaza looking east/north-east. The proposed planting in the foreground will act as a soft buffer between the application site and the adjoining third party lands to the west in the short term. The plaza is enclosed by Block A on its northern side and Block K on its eastern side, creating definition and a sense of enclosure to this space.

1B. In relation to the eastern part of the site, the following should be revised or detailed:

(a) Further public open space north of the Link Road at the eastern entrance to the site from Ninth Lock Road.

Response:

The applicant is not in control of the lands to the east of the red line of application. These lands are subject to folio no. DN192802F and we understand that they are in the ownership of Coras Iompair Éireann. Therefore, the applicant is not in a position to deliver additional open space at this location. We note, however, that given the current proposal to provide open space within the application site along the northern and eastern boundary, that if ownership / consent alters in the future then it is considered that the proposed open space can be easily extended into this area and the proposed layout will not preclude same from happening.

(b) Omission of the easternmost road off the south of the Link Road and replacement with open space.

Response:

The eastern road off the south of the Link Road has been omitted and this area replaced with open space – refer to the submitted Davey+Smith site layout plan drawing no. 2004-PL-002 and the RMDA landscape masterplan (drawing no. 01LP) and landscape planting plan (drawing no. 06LP(ii)) for details of same.



(c) Overall revised landscape design for this area, including the incorporation of the permitted attenuation pond.

Response:

Please refer to the submitted landscape drawings (landscape plan drawing no. 01LP & landscape planting plan drawing no. 06LPP(ii)) prepared by RMDA which illustrates the proposed landscape design and planting for the south-eastern part of the application site.

2. Parameters

The applicant is requested to:

(a) Clarify the Net Developable Areas for the proposed development, including a breakdown per subsector, delineated on a site layout plan. Use this information to clarify net residential densities.

Response:

(a) Please refer to the enclosed Davey+Smith drawing no. 2004-PL-010 "Developable Areas Map" which illustrates both the gross and the net areas for each of the sub-sectors within the application site. The area including the permitted east-west main link street (which is outside of the red line of application) was discounted to calculate the net density, as was the access road to the pumping station to the south-west (also outside of the red line of application). Areas of public open space were also discounted to calculate the net density.

The net developable areas within the subject application site are as follows:

- CUC-S4 – net developable area = 1.85Ha,
- CSE-S1 – net developable area = 2.39Ha,
- CSE-S2 - net developable area = 0.93Ha.

(b) Amend the site boundary so that the lands to the north and east, which contain the existing pathway are included within the site and incorporated into the landscape and open space proposals.

Response:

The lands abutting the immediate northern and eastern boundaries of the proposed development are not in the applicant's control or ownership and are subject to folio no. DN192802F, which we understand is in the ownership of Coras Iompair Eireann (CIE). The proposed development will not impact on the existing footpath that leads to the train station and the proposed landscaping plans will not impact on same, in fact, potential connections to the path are allowed for as part of the submitted landscape plan, subject to agreement with CIE – refer to RMDA drawing no. 01LP "Landscape Plan".



(c) The net residential density for Clonburris Southeast Subsector 1 should be revised to within the margin of 51-61dph.

Response:

The Development Area of Clonburris South East is sub-divided into 2 separate sub-sectors i.e. CSE-S1 and CSE-S2 which combined account for a net developable area of 3.3Ha, which is envisaged to accommodate a minimum of 184 no. dwellings, a target of 201 no. dwellings and a maximum of 217 no. dwellings, as per the SDZ Planning Scheme.

A strip of approx. 0.17Ha along the eastern boundary of CSE-S1 can be discounted, as that is outside of the application site (in separate ownership). In addition, the central area of open space, accommodating the retention of the north-south hedgerow, is approx. 1Ha in area, which leaves a net developable area of approx. 2.07Ha of the application site in CSE-S1, upon which it is proposed to deliver 119 no. dwellings, thus producing a net density of c.50 units per hectare, which is just under the required margin of 51-61dph. However, we note that according to the Planning Scheme, in the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph).

Table 2.13.1 of the Planning Scheme provides a summary of the quantitative parameters contained within the SDZ. For the purposes of the subject application, table 1 below shows the relevant targets for the application site.

Development Area	Sub - Sector	Net Area (Ha)	Average Net Density (Low)	Average Net Density (High)	Total No. Dwellings (Low Margin)	Total Dwellings (Target)	Total Dwellings (High Margin)
Clonburris South East	CSE-S1	2.17	51	61	111	122	132
Clonburris South East	CSE-S2	1.13	65	75	73	79	85

Table 2 – Extract from Table 2.13.1 “Development Areas in Clonburris and Sub Sectors”.

CSE-S1

- Total dwellings (low margin) – 111
- Total dwellings (high margin) – 132
- Total dwellings (target) – 122

CSE-S2

- Total dwellings (low margin) – 73
- Total dwellings (high margin) – 85
- Total dwellings (target) – 79

The part of the application site that lies within all of Clonburris South East proposes to develop 188 no. dwellings across both sub-sectors (i.e. CSE-S1 = 119 no. units + CSE-S2 = 69 no. units) which is within the combined total dwellings low and high margins (i.e. combined low margin for both sub-sectors = 184 no. dwellings & combined high margin for both sub-sectors = 217 no. dwellings), therefore meeting the target dwelling numbers for this Development Area as set out in the Planning Scheme.

The proposed quantum of units in CSE-S1 is also within the low and high margin target of the SDZ Planning Scheme.



(d) SDCC's Housing Department requests that a revised Part V proposal is submitted that is more reflective of unit mix and to provide for better integration within the development.

Response:

The applicant has prepared the submitted Part V proposal which proposes that 10% Social Housing and 10% Affordable Housing be provided as part of the revised, proposed development.

It is proposed to provide 34 no. social units that are comprised of:

- 6 no. 1 bed apartments
- 22 no. 2 bed apartments and duplex apartments
- 6 no. 3 bed apartments.

All of which are accommodated in the proposed apartment block B and duplex block D

In addition, 28 no. affordable units are proposed that are comprised of 2 and 3 bed units accommodated in duplex blocks B and E:

- 12 no. 2 bed units
- 16 no. 3 bed units.

The enclosed Part V schedule identifies the specific unit types are proposed to satisfy the applicant's Part V obligations, with the current proposal, if permitted, being subject to agreement with the Housing Department of South Dublin County Council prior to the lodgement of a commencement notice, in accordance with the relevant statutory provisions. The units to be acquired and acquisition prices etc. are to be agreed subsequent to a grant of permission and prior to lodgement of commencement notice. We acknowledge that there is a Part V requirement of 20% so in this case that equates to 57 no. units, which is subject to a grant of permission, however, should the number of permitted dwellings be less than the current proposal of 62 no. social and affordable housing units, then it is considered that the Part V requirement may be less than 57 no. units.

Please also refer to the enclosed Davey+Smith drawing no. 2004-PL-007 "Part V Proposal" to identify the location of the proposed Part V units.

3. Residential Standards

(a) The applicant is requested to clarify dwelling mix, including how many 2 bed / 3 person apartments are proposed.

Response:

There are 22 no. 2 bedroom / 3 person units proposed, 21 of which are accommodated in Block A and 1 no. such unit accommodated in duplex block K. Out of 283 no. units proposed, the 22 no. 2 bedroom / 3 person units equate to c.8% of the total proposed residential accommodation.



(b) Apartment Block A should be redesigned to provide for a higher no. of dual or more aspect apartments.

Response:

Block A has been revised whereby it now accommodates 39 no. units, 17 of which are single aspect and 22 no. which are dual aspect. This equates to 56% of the proposed apartments in Block A being dual aspect which accords with section 3.17 of the 2020 Sustainable Urban Housing: Design Standards for New Apartments (hereafter "Apartment Guidelines") which states that *"it is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e. on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design"* (our emphasis added).

Furthermore, Specific Planning Policy Requirement 4 (SPPR 4) of the Apartment Guidelines sets out: *In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:*

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.

(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects".

We note that the proposed Block B accommodates 22 no. units, out of which 16 are dual aspect (i.e. c.73%). Combined, Blocks A and B provide 38 no. dual aspect units, which equates to an overall provision of 62% dual aspect apartments within the proposed development, thus complying with the above criteria.

(c) Further detail and a revised design for communal open space should be submitted. This include revised boundary treatment, consideration of sunlight access and how it will tie in with potential development to the west.

Response:

Details of the proposed landscaping for the communal open spaces associated with Blocks A and B are provided on the submitted RMDA landscape drawings no.s:

- 02BP "Boundary Plan",
- 06LPP "Landscape Planting Plan (i)" and
- 01 LP "Landscape Plan".

A 1.2m railing will be implemented along the boundary of the communal open space, with details of same illustrated on page 3 of the submitted RMDA Additional Information Response document, and the submitted Boundary Plan (drawing no. 02BP) – please refer to same.



The communal open spaces are designed to act as a shared amenity space for the residents of Blocks A and B only, with a specific space designated to each building/block. This space will be for the sole use of the residents of these blocks and to that end a 1.2m railing will be implemented along the boundary of the communal open space to define this space as being associated with the adjoining apartment building but being of a size and type that allows a visual connection both into and out of these communal spaces.

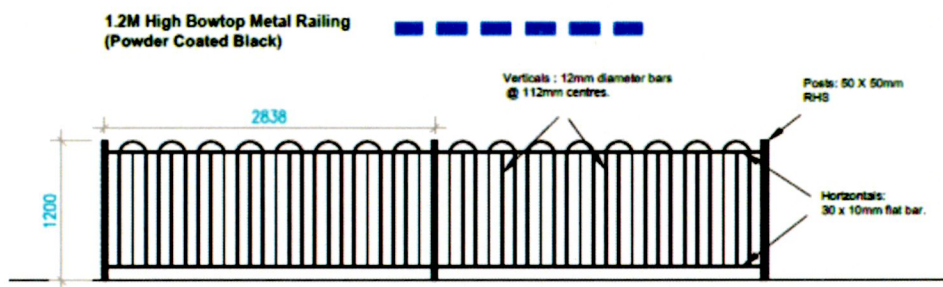


Fig. 11 – Sample of proposed Communal Open Space Railing

The submitted Daylight Sunlight Assessment Report by 3D Design Bureau assessed the level of sunlight on March 21st within the proposed amenity areas, including communal open spaces, and the submitted assessment confirms that “all public and communal open spaces far exceed the minimum recommended level of sunlight”. The report also asserts that “all public open spaces and communal open space 1 will have good sunlight access throughout the majority of the day. Communal open space 2 will have sunlight access throughout the afternoon”. Please refer to the submitted Daylight Sunlight Assessment Report for full details.

4. Movement & Transport

(a) Pedestrian and Cyclist Movement

The Planning Scheme provides an Overall Movement Concept in Figure 2.2.7. This indicates a Proposed Strategic Pedestrian Cycle Route along the northern and eastern boundaries of the subject site. This is noted as existing and should be incorporated into the overall layout and design of the proposed development. The figure also indicates a Proposed Strategic Pedestrian Cycle Route from the site, along the east of the permitted pumping station, to the Grand Canal. The applicant should demonstrate how this route connects with the subject site, the permitted pump site and through to the Clonburris Urban Centre and wider area.

Response:

The lands abutting the immediate northern and eastern boundaries of the proposed development are not in the applicant’s control or ownership and are subject to folio no. DN192802F which we understand is in the ownership of Coras Iompair Éireann (CIE). The proposed development will not impact on the existing footpath/cycle path that leads to the train station and the proposed development / landscaping (& boundary) plans will not impact on same, in fact, potential connections to the path are allowed for as part of the submitted landscape plan, subject to agreement with CIE – refer to RMDA drawing no. 01LP “Landscape Plan” for an illustration of same.

The proposed development does not propose to alter any existing planting / vegetation along the northern and eastern boundaries but proposes to supplement planting by way of introducing a native hedgerow along these boundaries, and the applicant will agree such details with both the Planning Authority and/or CIE as appropriate/required.



The submitted feasibility allows for pedestrian and cyclist permeability throughout the lands, both the subject site and the third party lands to the west.

(b) Street Network

Section 2.2.4 of the Planning Scheme outlines that the centre line and alignment of the Local Streets and Home zones are flexible with the exception of streets with frontages prescribed under Section 3 (Development Areas). In this instance, the application site contains prescribed frontages in the form of Avenue, Park and Railway Frontages (Figure 3.1 refers). The Local Street alignment in the north western part of the site, in CUC-S4, is amended and Local Streets/frontages are not provided around the urban plaza as indicated in the Planning Scheme. This would have Avenue Frontages onto it. This should be provided. The Planning Scheme does not provide for the easternmost cul-de-sac to the south of the Link Road. This should be considered for omission and/ or a detailed rationale provided.

Response:

The enclosed revised site layout plan has enlarged the proposed urban plaza and provided building frontage onto it. The lands to the immediate west are in third party ownership, however, as outlined in detail above, the project architects Davey+Smith have prepared the submitted indicative feasibility layout for the remainder of the CUC-S4 lands which demonstrates that future, further enclosure of the plaza can be facilitated. Cognizance has also been paid to section 2.2.4 of the SDZ Planning Scheme, as well as Figures 2.2.1 and 2.4.2 of the Planning Scheme.

Figure 2.4.2 of the Planning Scheme identifies 'Fine Urban Grain' locations in the Planning Scheme. This diagram also identifies fixed building lines, which largely front to main streets with flexible inner lines between blocks, to which the proposed development in CUC-S4 complies. Blocks F and K directly address the main east-west link street to the immediate south. Block A has been amended to provide a more defined and stronger frontage onto the plaza, while the feasibility layout for the remainder of the CUC-S4 lands demonstrate that proposed urban blocks can further enclose the plaza and that proposed local streets can be facilitated and tie into the current proposed site layout plan.

The principle of main link route through the lands is already permitted via the east-west main link street traversing the application site. The proposed site layout plan provides for a strong urban street frontage along this route thus creating a defined sense of enclosure that has an active frontage and is passively supervised. The remainder of the proposed internal road network on the application site is comprised of local streets and homezones, which given the need to retain hedgerows and accommodate permitted infrastructure, is considered to follow the principles of the street hierarchy and urban grain as set out in the SDZ Planning Scheme. The principle of all designated streets within the Planning Scheme is fixed and the alignment of each street including its centre line (i.e. refer to Figure 2.8.5 in Section 2.8 of the Planning Scheme – "Building Centre Line & Urban Grain") are either fixed or flexible depending on typology. The planned street hierarchy for the SDZ lands is illustrated in Figure 2.2.1. The Arterial Streets and Link Streets are fixed whereas the local streets are flexible. It is clear from the submitted site layout plan that the proposed development accords with these parameters.



Fig. 12 – Extract from Figure 2.2.1 of Planning Scheme - “Full Street Hierarchy”.

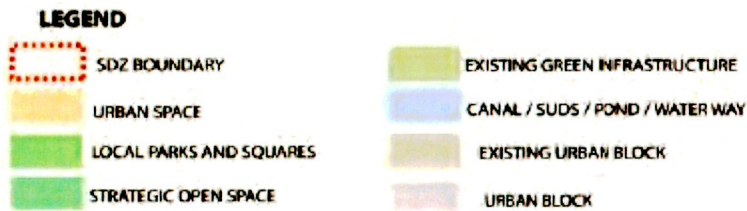


Fig. 13 – Extract from Figure 2.4.2 “Fine Urban Grain Locations in Planning Scheme”.

A

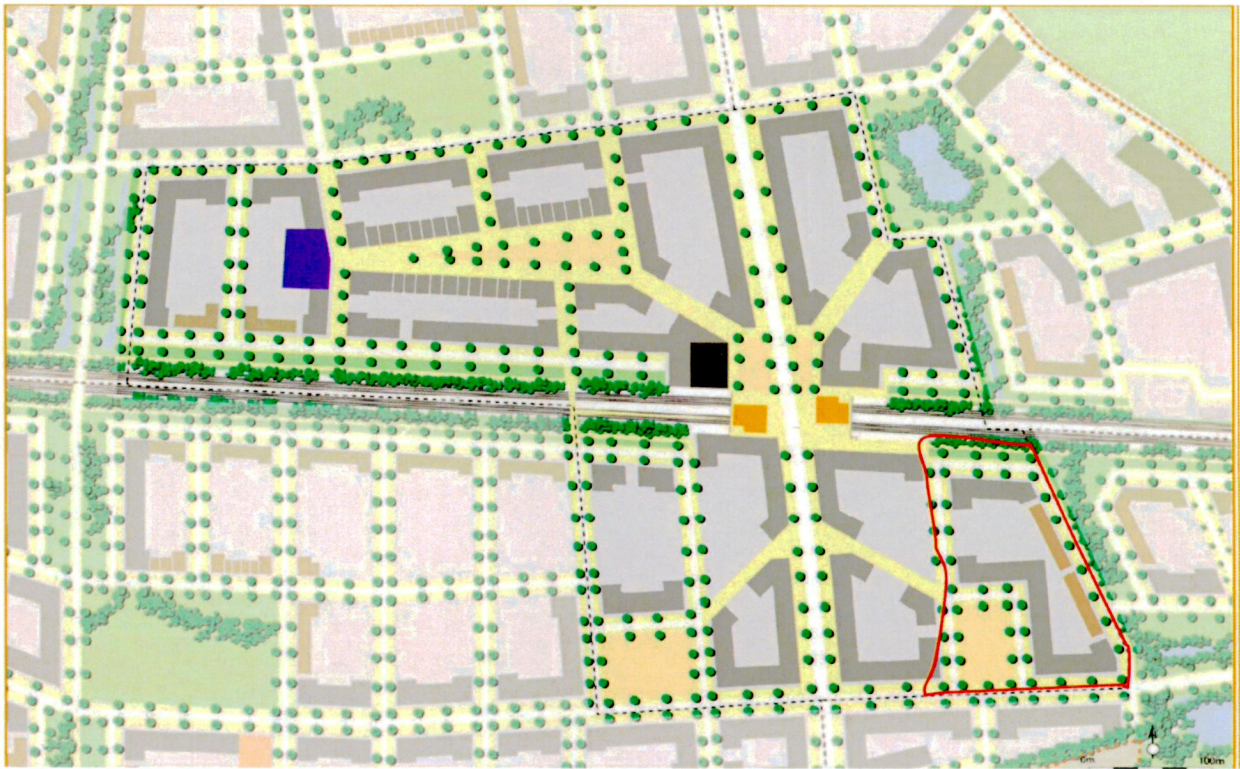


Fig. 14 - Extract from Figure 3.3.3 "Clonburris Urban Centre" of the Planning Scheme, with part of the subject application site, located within CUC-S4, indicatively outlined in red.

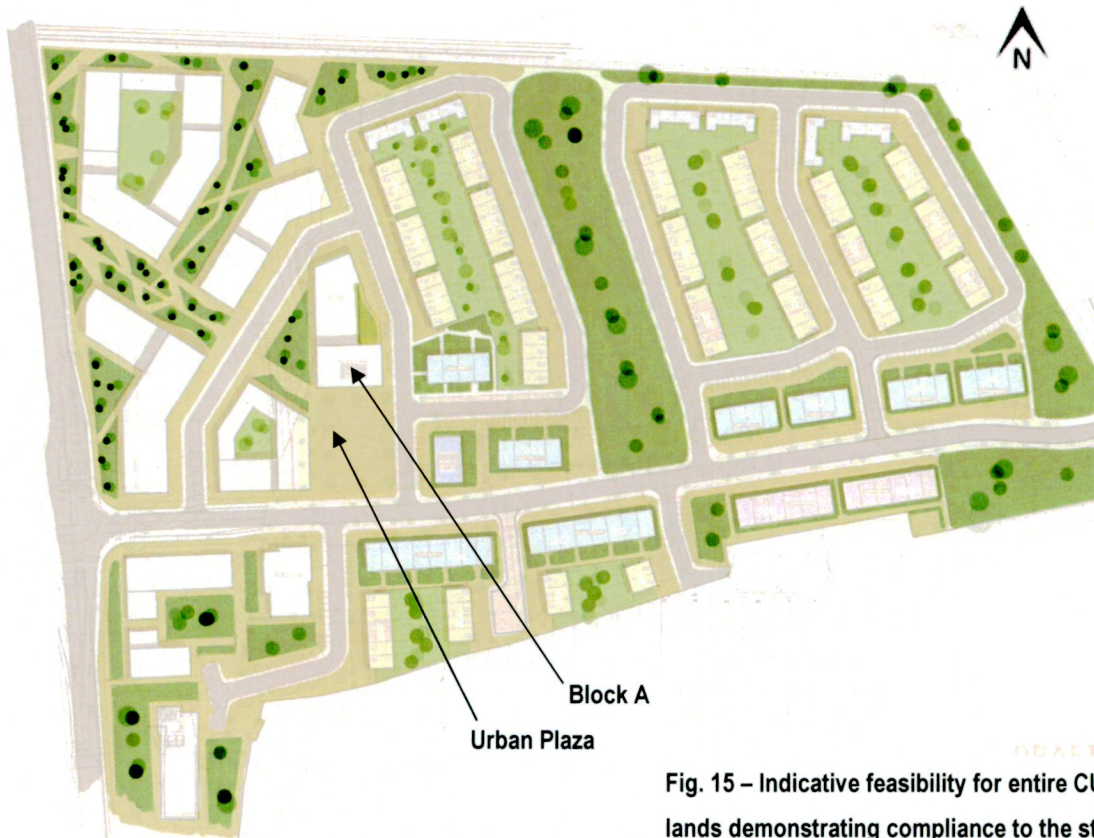


Fig. 15 – Indicative feasibility for entire CUC-S4 & CSE lands demonstrating compliance to the street hierarchy & urban grain of the SDZ Planning Scheme



The enclosed revised site layout plan has omitted the easternmost cul-de-sac to the south of the Link Road and this area has been incorporated into open space – refer to the submitted RMDA landscape masterplan (drawing no. 01LP) and landscape planting plan (drawing no. 06LP(ii)) for details of same.

(c) Plot Adjustment

The applicant is requested to demonstrate that the proposed development involving a plot adjustment would not significantly affect the prescribed alignment or centre line of any fixed street; would not significantly affect prescribed building lines of any fixed street; would not adversely impact on the environment or environmental objectives contained in the SEA Environmental Report (including required setback from the Grand Canal); and would not have any implications in relation to European Sites.

Response:

We note that the SDZ Planning Scheme outlines that some slight plot adjustment for each sub-sector may be acceptable, provided that this would not affect prescribed dwelling numbers/densities or non-residential floorspace for any sub-sector; would not significantly affect the gross or net development area of any sub-sector.

To that end, and taking into account all of the above outlined information regarding feasibility layouts, densities and unit numbers, it is evident that the proposed development in sub-sector CUC-S4, along with the submitted feasibility provides for a total of c.330 no. dwellings at a density of 85-90 units per hectare which complies with the ranges for this sub-sector outlined in the SDZ Planning Scheme, i.e. between 258 (min) – 573 (max) no. dwellings within a density range of 67-150 no. units.

For CSE-S1 and CSE-S2, the proposed development provides for 188 no. dwellings across both sub-sectors (119 no. units in CSE-S1 and 69 no. units in CSE-S2) which is within the combined total dwellings low and high margins (i.e. combined low margin for both sub-sectors = 184 no. dwellings & combined high margin for both sub-sectors = 217 no. dwellings), therefore meeting the target dwelling numbers for this Development Area as set out in the Planning Scheme.

As outlined above, the proposed net density on CSE-S1 is 50 units per hectare. The current proposal provides for 69 no. units in CSE-S2 which provides a net density of 74 units per hectare. Therefore, the proposed development is almost fully compliant with the density range for both sub-sectors as set out in the Planning Scheme (i.e. 51-61 dph in CSE-S1 & 65-75dph in CSE-S2), but we note that according to the Planning Scheme, in the interest of flexibility, each of the density margins are based on a density target, which is then subject to a permissible margin of 10 dwellings per hectare (+5 dph, - 5dph).

We also note that the SDZ Planning Scheme requires developers/applicants to demonstrate that a proposed development involving a plot adjustment would not significantly affect the prescribed alignment or centre line of any fixed street; would not significantly affect prescribed building lines of any fixed street; would not adversely impact on the environment or environmental objectives contained in the SEA Environmental Report (including required setback from the Grand Canal); and would not have any implications in relation to European Sites.

The proposed development is based (a) upon the principles and objectives of the SDZ Planning Scheme and (b) around the permitted infrastructure such as the east-west main link street, attenuation tanks and ponds, none of which are proposed to be altered by the proposed development. The proposed development has followed the line of the permitted link street, and has demonstrated that adjoining lands in the relevant sub-sectors can be developed in a manner that follows the urban street framework of the Planning Scheme. The proposed development is at a remove from the Grand Canal such that it will not impact on same and the submitted environmental reports confirm that the proposed development will not have any implications in relation to European Sites. Therefore, taking all of the foregoing into consideration, it is put forward that the proposed development is not inconsistent with the Planning Scheme.



(d) Street Widths & Car Parking

The proposed overall street widths are largely in line with the Planning Scheme. However, the Planning Authority does have concerns in relation to the allocation of space within these, particularly the Local Streets and Intimate Local Streets. Reference is made to Figure 2.2.6 in the Planning Scheme. The Planning Authority also has concerns about the level of perpendicular car parking on the local streets and the on curtilage parking in intimate local streets. The footpaths on the local street are approx. 2m when they should be 2.5-4.0m. Intimate Local Streets should be fully shared surfaces for the integrated movement of vehicles, pedestrians and cyclists in quieter residential areas. The intimate local street in the east of the site should be significantly redesigned in line with the Planning Scheme.

The applicant is requested to submit revised plans indicating revised details. Dimensioned cross sections with comparison to the Planning Scheme should also be provided.

Response:

The proposed local streets paths are 2.4m wide with a 4.8m wide road.

Homezone/ pedestrian priority streets (5 no.) are catered for within the proposed development, and where shown, the paths shall be of the same material as the road with a flush kerb delineation, between road and path – please refer to the submitted RMDA landscape plan (drawing no. 01LP) for details.

Please also refer to the submitted RMDA drawings no.s 3(i-ii) SCT “Landscape Sections” which illustrate compliance with Figure 2.2.6 of the Planning Scheme.

It is considered, from an urban design perspective, that the east-west main link street ought to have a strong urban edge to it, hence the proposal to position the duplex Blocks G, H, I & J along the north side of this road which crates a strong urban streetscape. The end units of these blocks are dual frontage, as are the end units in Blocks A, B, & F. Car parking and bin and bicycle all associated with these buildings are positioned to the north of same, with the overall internal road layout being DMURS compliant.

(e) EV Parking

To facilitate the use of electrically operated cars and bicycles, all developments should provide charging points for the charging of electric vehicles at a rate of 100% of the car parking provision and 10% of the bicycle parking provision. Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted.

Response:

BBSC Building Services Consulting Engineers have prepared the submitted drawing “EV Chargers & Apartment Water Requirements” which illustrates the type of chargers for cars and bicycles and the location of same throughout the proposed development.



(f) Whitton Avenue

Further detail is required in relation to the Whitton Avenue access, including the levels across the access within the site and Whitton Avenue. Pedestrian and cyclist access also needs to be considered. A revised detailed layout (not less than 1:200 in scale) and design for that area should be provided.

Response:

Please refer to submitted Pinnacle Engineering Drawing No. P200306-PIN-XX-DR-D-0006-S1 which illustrates the suggested connection from the proposed development site into Whitton Avenue. Proposed footpaths from the development will connect into the existing footpaths on Whitton Avenue. As per the proposed development, cyclists will share the road space with cars.

(g) Other roads items requested for submission:

- A Stage 1 Road Safety Audit.

Response:

Please refer to the enclosed Road Safety Audit prepared by Bruton Consulting Engineers. It should be noted that all recommendations, as they relate to the development, have been accepted in full.

- An overall management plan of refuse collection for the apartments should be provided, detailing collection points and vehicle routes throughout the entire development.

Response:

Pinnacle Engineering have prepared the enclosed drawing no. P200306-PIN-XX-DR-D-0011-S1 which illustrates the AutoTrack layout for a refuse vehicle through the development. We note that there are numerous private contractors that provide household and commercial waste collection in the South Dublin County Council area. All waste contractors servicing the proposed development must hold a valid waste collection permit for the specific waste types collected. All waste collected must be transported to registered, permitted and/or licensed facilities only.

A collection points has been illustrated on the enclosed Pinnacle Engineering drawing no. P200306-PIN-XX-DR-D-0011-S1. The road beside the bin store will be used as a set down area for the waste collection vehicles while the bins are emptied.

The majority of the waste generated by the occupants will comprise mixed recyclable and mixed non-recyclable waste. This waste will be stored separately onsite in communal bin store areas. Bins can be collected via internal estate roads using a standard refuse vehicle. The bins will be brought to the collection point by the waste contractor at the time of collection (and not before) and will be loaded directly into the refuse vehicle. It is anticipated that the bins will only require one collection per week.

It is recommended that waste collection times/days are staggered for the different waste types to reduce the number of waste collection vehicles requiring access to the collection point at any one time.

All waste receptacles presented for collection will be clearly identified as required by waste legislation and the requirements of the South Dublin County Council Waste Byelaws. Also, waste will be presented for collection in a manner that will not endanger health, create a risk to traffic, harm the environment or create a nuisance through odours or litter.



- Details of the pedestrian and vehicle routes within the development that align with the SDZ planning scheme.

Response:

Pedestrian and vehicle routes follow the east-west main link street that already has the benefit of permission under Ref. SDZ20A/0021. The design of this permitted road is in accordance with the SDZ Planning Scheme and includes bus stops, public lighting, landscaping and toucan crossings. The proposed development expands this network with local streets and junctions co-ordinated to the permitted main link street. Pedestrian permeability has been provided throughout the development with no significant level changes proposed across the scheme.

- A revised layout not less than 1:200 scale showing the cross sections of the roads confirming the layouts as described in the SDZ planning scheme within the development.

Response:

RMDA Landscape Architects have prepared the submitted drawing no. 01LP "Landscape Plan" which illustrates the proposed treatments for the roads internal to the development, while drawings no.s 3(i-ii) SCT "Landscape Sections" both illustrate the proposed roads sections and associated landscaping detail throughout the scheme, at the appropriate scale. In addition, details are also set out in the submitted RMDA Additional Information Response document – please refer to the aforementioned enclosures.

5. Green and Blue Infrastructure & Ecology

(a) *The retention of the north south tree line/hedgerow helps provide the Local Green Corridor running through the site. The proposal has the potential to contribute to the indicated green corridors along the northern and eastern boundaries of the site. Narrow strips of open space are proposed along these boundaries. However, the applicant is requested to extend the site boundary to the railway line to the north and bridge to the east and incorporate the existing pathway and open space here. The existing green palisade fence should be removed to facilitate this. Landscaping along these corridors should make a significant contribution to the site and wider green infrastructure network. Revised plans should be submitted via additional information.*

Response:

The lands abutting the immediate northern and eastern boundaries of the proposed development are not in the applicant's control or ownership and are subject to folio no. DN192802F, and we understand that they are in the ownership of Coras Iompair Éireann (CIE). The proposed development will not impact on the existing footpath that leads to the train station and the proposed landscaping plans will not impact on same, in fact, potential connections to the path are allowed for as part of the submitted landscape plan, subject to agreement with CIE – refer to RMDA drawing no. 01LP "Landscape Plan". The proposed development does not propose to alter any existing planting / vegetation along the northern and eastern boundaries and to supplement planting by way of introducing a native hedgerow along these boundaries, and the applicant will agree such details with both the Planning Authority and/or CIE as appropriate/required.

(b) *The submitted Ecological Impact Assessment states that further surveys for bats, newts, breeding birds were recommended from the initial walkover in April 2022, and these are currently in process. The results from these surveys should be submitted via additional information.*