

ARMSTRONG FENTON

ASSOCIATES

25th November 2022.

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

2 8 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.

Land Use Planning & Transportation

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ARMSTRONG FENTON LTD TRADING AS ARMSTRONG FENTON ASSOCISOUTH Dublin County Council PLANNING AND DEVELOPMENT CONSULTANTS

13 THE SEAPOINT BUILDING, 44-45 CLONTARF ROAD, DUBLING, 2008 CHEE

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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 by 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 lrish 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.
Clonburris Urban Centre (CUC)	S1	65	150
	52	73	150
	53	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 "Clonburris 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.

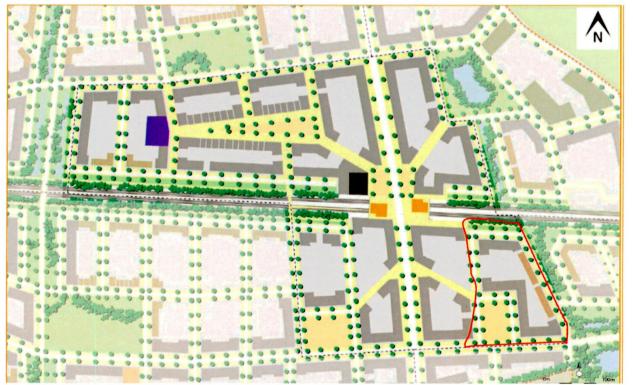
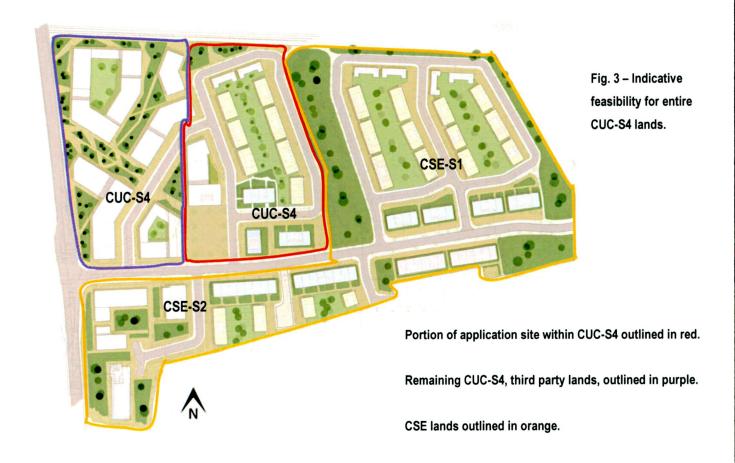


Fig. 2 - Extract from Figure 3.3.3 "Clonburris Urban Centre" of the Planning Scheme, with part of the subject application site indicatively outlined in red.



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, closers 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.





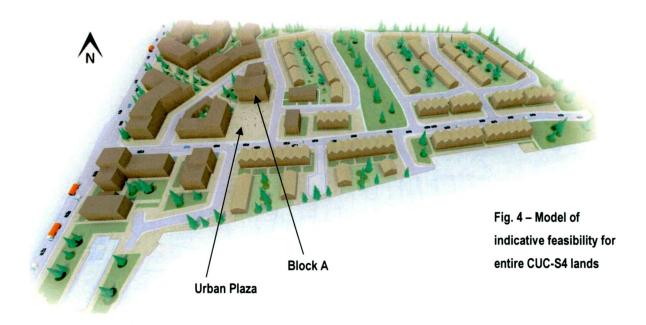




Fig. 5 – Model of indicative feasibility for entire CUC-S4 lands

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 Fig.s 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.



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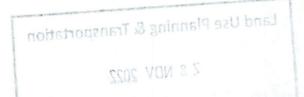
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Response:

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;
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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.

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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.

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- 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.

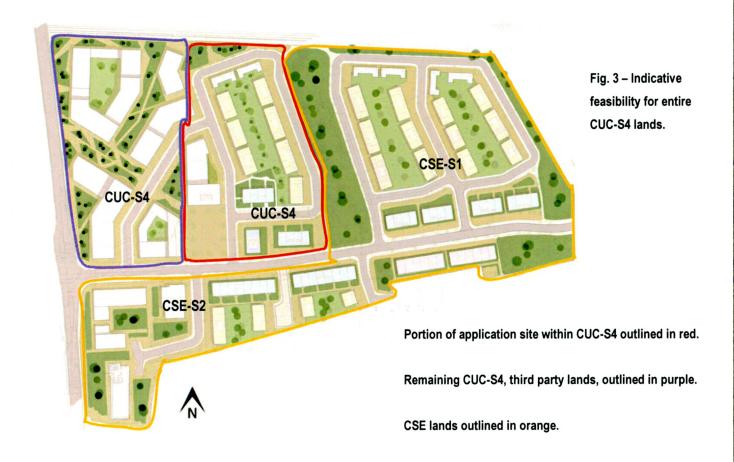


Fig. 2 - Extract from Figure 3.3.3 "Clonburris Urban Centre" of the Planning Scheme, with part of the subject application site indicatively outlined in red.



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, closers 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.





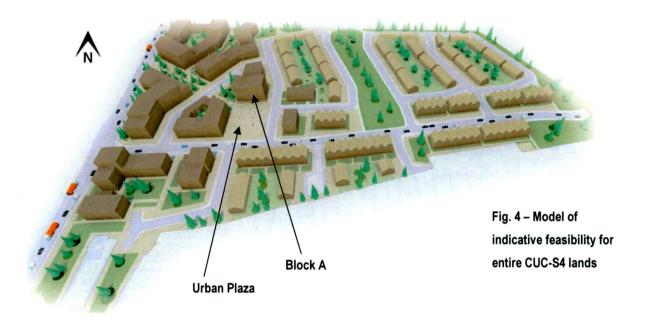




Fig. 5 – Model of indicative feasibility for entire CUC-S4 lands

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 Fig.s 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.



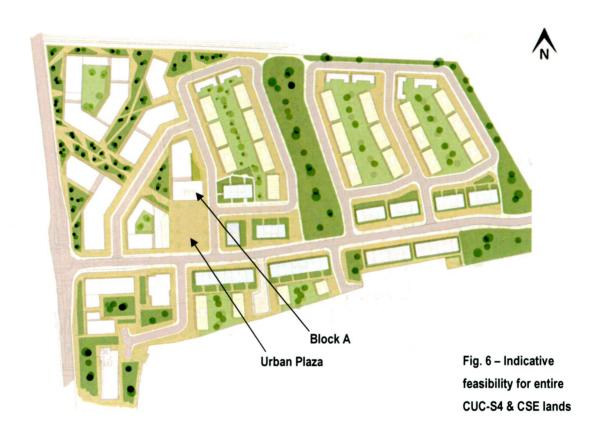
(b) The proposed plaza and surrounding block form should be significantly redesigned in line with the Design Criteria in Table 2.10.3 of the Planning Scheme. A detailed design of the plaza should be submitted, including how it would connect with the remainder of the Clonburris Urban Centre and wider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



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. 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.

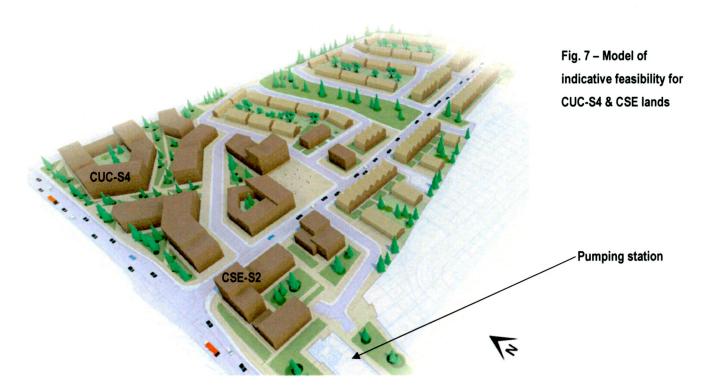
We also note that the submitted feasibility includes a quantum of c.5,300sq.m of non-residential space [community, retail and employment uses] would be provided across all of CUC-S4, the shared landholding, which is within the required quantum of the SDZ Planning Scheme, namely Table 2.13.1.

- (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 Fig.s 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.





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 southwestern 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 lompair Eireann. 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 lompair 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.

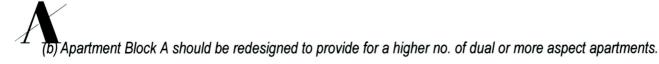
Please also refer to the enclosed Davey+Smith drawing no. 2004-PL-007 "Part V Proposal" to identify the location of the proposed Part V units.

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.



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 <u>in SDZ areas</u>, 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.

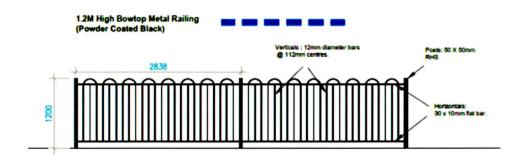


Fig. 11 - Sample of proposed Communal Open Space Railing

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 lompair Eireann (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 kink 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.

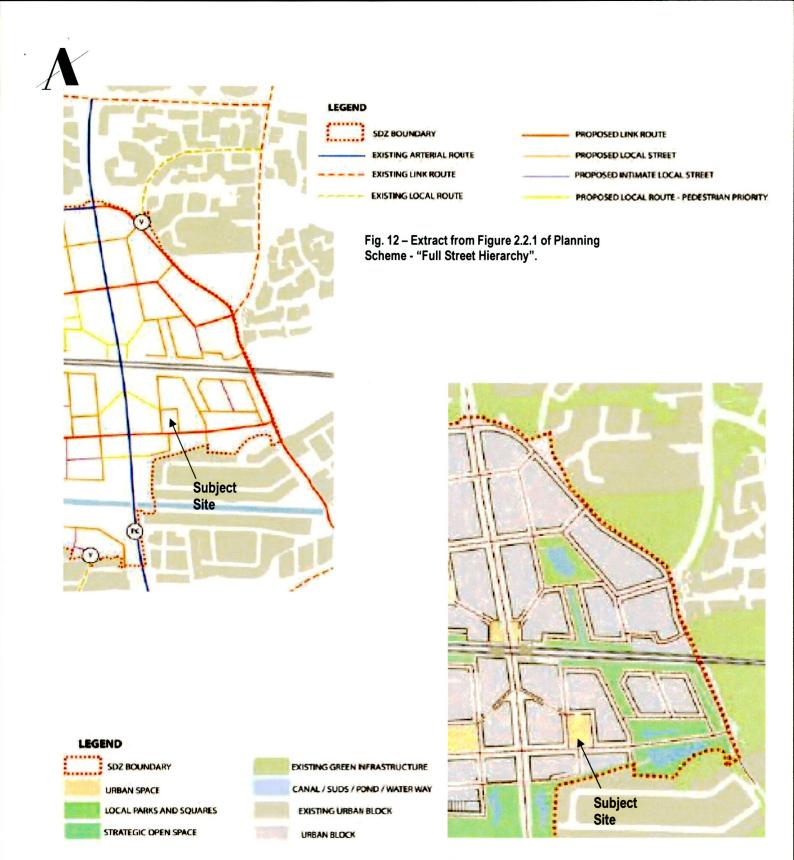


Fig. 13 – Extract from Figure 2.4.2 "Fine Urban Grain Locations in Planning Scheme".



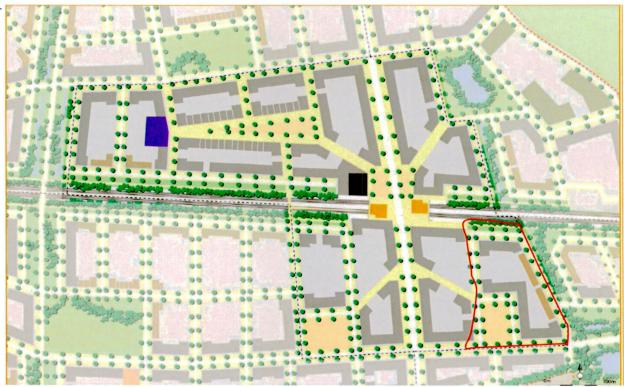
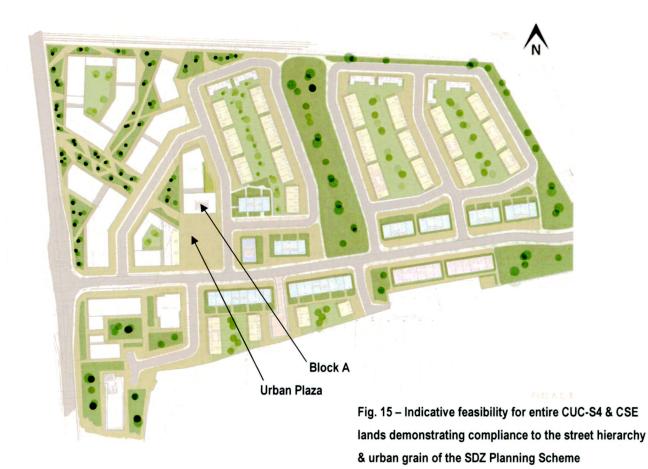


Fig. 14 - Extract from Figure 3.3.3 "Clonburris Urban Centre" of the Planning Scheme, with part of the subject application site, located within CUC-S4, indicatively outlined in red.





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 demonstrated 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 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

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.

(t) 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 sale. 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 lompair 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". 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.



PH 019- Duplex Block	C & D End Unit A – Proposed Plans, Section & Elevations	1:100 @ A1
PH 020- Duplex Block	C & D End Unit B – Proposed Plans, Section & Elevations	1:100 @ A1
PH 021- Duplex Block	C & D Mid Unit – Proposed Plans, Section & Elevations	1:100 @ A1
PH 022- Duplex Block	E – Ground & First Floor Plans	1:100 @ A1
PH 023- Duplex Block	E- Second Floor & Roof Plans	1:100 @ A1
PH 024- Duplex Block	E – Sections & Elevations	1:100 @ A1
PH 025 Apartment Block K	Ground & First Floor Plans	1:100 @ A1
PH 026 Apartment Block K	Second, Third Floor & Roof Plan	1:100 @ A1
PH 027 Apartment Block K	Sections & Elevations	1:100 @ A1
PH 028 Apartment Block K	Bin Store / Bike Store A	1:100 @ A3
PH 029 Apartment Block F & K	Bin Store	1:100 @ A3
PH 030 Apartment Block E	Bin Store	1:100 @ A3

Prepared by Pinnacle Consulting Engineers:

Drawing/Document No.	Description	Scale
P200306- DUBLIN	Response to Additional Information	A4 Letter
1470R01	Quality Audit	A4 Report
P200306-PIN-XX-DR-D-0006-SI	General Layout Whitton Avenue	1:200 @ A1
P200306-PIN-XX-DR-D-0011-SI	Autotrack Layout Refuse Vehicle	1:200 @ A1
P200306-PIN-XX-DR-D-0020-SI	Road Construction Details	NTS @ A1
P200306/so'r	Response Letter to Al Item No. 7	A4 Letter
P200306-200	General Drainage Layout	1:500 @ A1
P200306-201	General Watermain Layout and Levels	1:500 @ A1

Prepared by Ronan MacDiarmada & Associates:

Drawing/Document No.	Description	Scale
N/A	Landscape Al Rationale Document	A3 Document
N/A	Specification of Landscape Works	A4 Document
N/A	Clonburris Schedule	A4 Document
01 LP	Landscape Plan	1:500 @ A0
02 B.P	Boundary Plan	1:1000 @ A1
03(I) SCT	Landscape Sections (i)	1:100 @ A1
03(II) SCT	Landscape Sections (ii)	1:100 @ A1
03(III) SCT	Landscape Sections (iii)	1:100 @ A1
04 DP	Landscape Detail Plan	Varies
04 DP	Landscape Detail Plan - Plaza	Varies
05 L & E.P	Landscape & Engineer Plan	N.T.S
06 LPP	Landscape Planting Plan (i)	Varies
06 LPP	Landscape Planting Plan (ii)	Varies
06 LPP	Landscape Planting Plan (iii)	Varies
06 LPP	Landscape Planting Plan (iv)	Varies
06 LPP	Landscape Planting Plan (v)	Varies
06 LPP	Landscape Planting Plan (vi)	Varies
07 L&A.P	Landscape & Arborist Plan	N.T.S

Prepared by Arborist Associates Ltd:

Document / Drawing No.	Title	Scale
CBC001	Tree Constraints Plan	1:500@A0
CBC002	Tree Protection Plan	1:500@A0
N/A	Arboricultural Assessment Report	A4 Document



Prepared by RSK Engineering & Environmental Consultants:

Drawing/Document No.	Description	Scale
604097 02 (00)	Ecological impact Assessment (EcIA)	A4 Report
604097 01 (03)	EIA Screening & Statement in Accordance with Article 299B(1)(B)(II)(II)(C) of the Planning and Development Regulations 2011-2021	A4 Report
604097 01 (01)	Breeding Birds Survey Report	A4 Report
604097 03 (00)	Clonburris Bat Report	A4 Report
604097 R7 (04)	Biodiversity Management Plan	A4 Report

Prepared by BBSC Building Services Consulting Engineers:

Drawing/Document No.	Description	Scale
N/A	SEAI PV Calculation Method	A4 Sheet
22_0322	EV Chargers & Apartment Water Requirements	As Indicated @ A1

Prepared by Bryne Environmental Consulting Ltd:

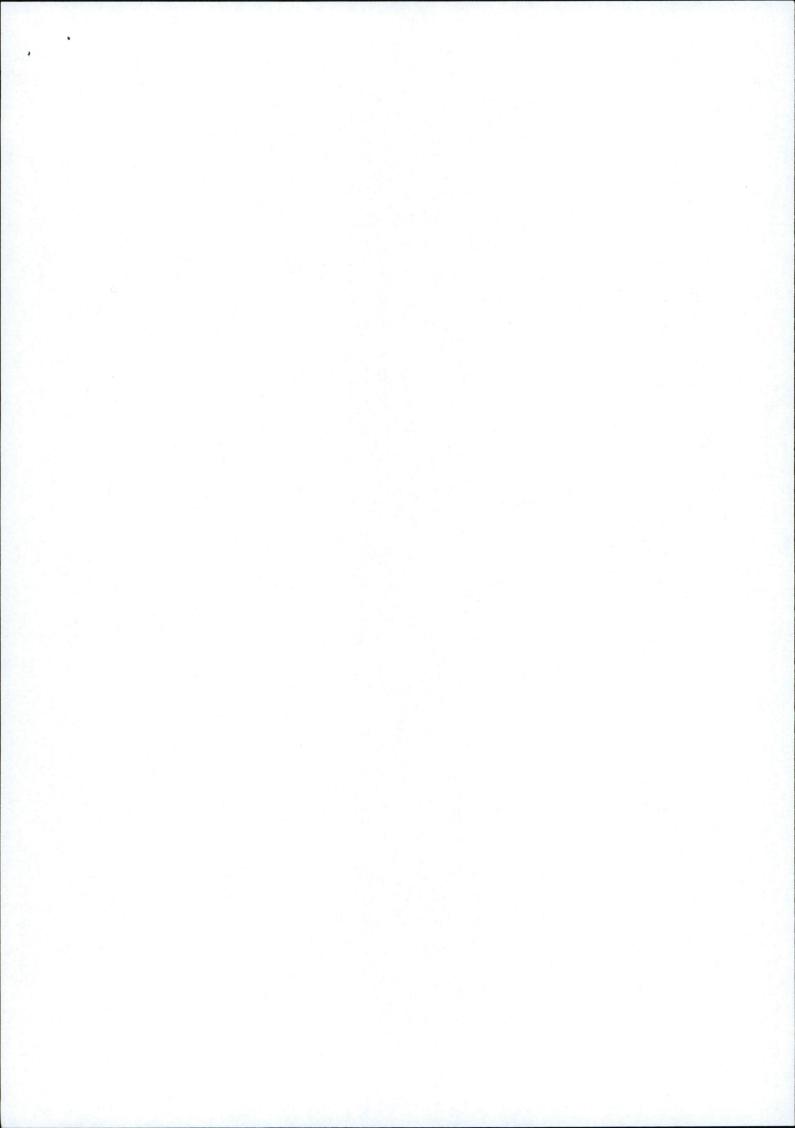
Drawing/Document No.	Description	Scale	
N/A	Acoustic Design Statement	A4 Report	

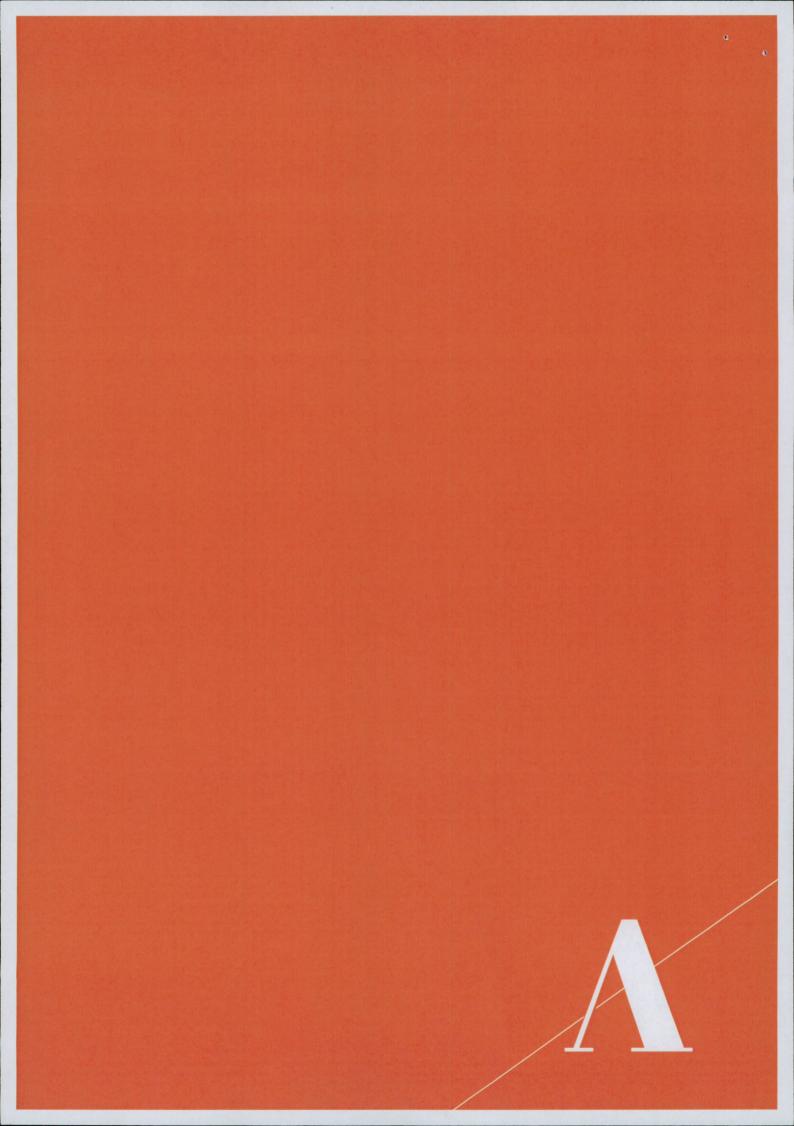
Prepared by 3D Design Bureau:

Drawing/Document No.	Description	Scale
N/A	Daylight & Sunlight Assessment Report	A4 Report

Prepared by Redmond Analytical Management Services:

Document / Drawing No.	Title	Scale
22047	Lighting Design Report and Specifications	A4 Document
22047-1	Public Lighting Layout	N.T.S
22047-2	Public Lighting Layout	N.T.S
22047-3	Public Lighting Layout	N.T.S
22047-4	Public Lighting Layout	N.T.S
22047-5	Electric Schematic	N.T.S







Response:

RSK Ireland has prepared the enclosed bat report. The initial application for permission was lodged on 4th July 2022. Bat activity surveys were conducted at sunset on 26th May, 22nd June, and 13th July 2022. Two surveyors were used on the first site visit, but this was reduced to one surveyor for subsequent surveys as this provided sufficient coverage of the site. Emergence surveys were conducted on 8th June, 28th June and the 27th July 2022. Section 3 of the submitted Bat Report provides details of the results of the bat surveys. The submitted Bat report concludes that four bats (2 Common pipistrelles, 2 unidentified bats) were observed potentially emerging from the derelict building on site (i.e. Cappagh House that has permission for its demolition under the permission for infrastructural works under Ref. SDZ20A/0021 in order to enable access from the western boundary of the site), and although these are not confirmed emergences, it is strongly recommended that a bat derogation licence be applied for against the existing planning permission for the demolition, and a suitably qualified ecologist to be present on site while the building is slowly disassembled to handle any roosting bats uncovered during works.

The submitted Bat Report also states that "Habitats on site are optimal for commuting and foraging bats, common pipistrelle, soprano pipistrelle, and Leisler's were documented during surveying on site. The potential for habitat enhancement through the planned planting in suitable areas of native Irish trees. The development could also provide further roosting opportunities using artificial roosts/ permanent bat boxes, such as the Schwegler's box. The incorporation of these artificial roosts, an appropriate lighting plan, and suitable tree planting would help mitigate the impacts of the development on local bat populations. If the construction phase occurs during peak bat activity season (late April to late October), night-working should be avoided to ensure that the area remains optimal for commuting and foraging bats. The construction should also follow the mitigation hierarchy, for example, avoid lighting first and if lighting is necessary then implement mitigation as per BCT lighting guidelines (BCT 2018). Any lighting such as security lighting during the period of works should be switched off when not in use and should not remain illuminated throughout the night".

RSK Ireland has also prepared the enclosed breeding birds survey report – please refer to same for full details. The submitted report confirms that surveys, in the form of walked transects, were conducted during spring and summer of 2022, and the findings of same are presented in the submitted report. A total of 29 bird species were identified on site during the surveys, which were carried out during three separate visits. Some of the species identified on site are listed as species of medium conservation concern (amber list) within the BoCCI (Birds of Conservation Concern in Ireland) list 2020-2026. These are: barn swallow, starling, lesser black-backed gull, and herring gull. Compensatory and mitigating measures are suggested to help minimise the potential impact of the development works on the local bird population.

The submitted breeding birds survey report sets out a number of measures to help mitigate for the loss of habitat that the development proposals will entail. The report concludes that "it is expected, as a consequence of the development works, that the habitat loss on site will be substantial. This may in turn cause fragmentation and isolation of habitats, and disturbance to species. Where possible, to minimize the impact of the proposed development on the local bird populations, hedgerows and tree lines present on site should be maintained, enhanced and protected. Selected areas within the communal amenity green spaces could be reserved and re-seeded with wildflowers, and managed by an annual late summer hay cut with the arising removed in order to attract higher numbers and increase the biodiversity of insects and other invertebrates, which would function as a foraging resource for breeding birds. In addition, the installation of a variety of bird boxes/artificial nests on trees and newly built structures, should minimise the negative impacts and maintain the local diversity of birds. In particular, species-specific artificial nests should be installed to attract summer visitor species faithful to nesting sites (swift, barn swallow, house martin), which are finding increasingly difficult, if not impossible, to come back to the same site each breeding season since their nests are often destroyed or removed during the winter months.



The removal of hedgerows, felling of trees, and demolition of the building ruins on site should be undertaken outside of the bird breeding season (March to August inclusive). If any vegetation removal works are required to commence during the bird breeding season, then a further inspection by a suitably qualified ecologist, in and within at least 5 m of the area to be impacted, is required immediately prior to commencement of the work. This is to ensure that no active nests and nest sites are illegally destroyed. If active nests are identified, then an appropriate standoff distance (10-20m) will be maintained, and vegetation removal will have to cease until young birds have successfully fledged.

To protect habitats suitable for breeding birds present within areas adjacent to the development site or within the wider landscape, standard pollution prevention control measures to maintain water and air quality should be outlined in a Construction Environmental Management Plan (CEMP)".

In relation to newts, this matter was screened out already in the Ecological Impact Assessment (EcIA) report that was initially submitted with this planning application.

(c) The applicant is requested to demonstrate compliance with the agreed Parks and Landscape Strategy for the SDZ, including designing and contributing to the Strategic Green Corridor along railway. A revised proposal taking account of the Parks and Landscape Strategy is required.

Response:

The proposed development, its layout and landscape design has paid cognisance to the parameters and objectives as set out in the Clonburris SDZ Planning Scheme. As noted above, the lands to the immediate north / east, running along those boundaries are outside of the control of the applicant, however, every effort will be made to engage with the owner, CIE, and the Planning Authority, as appropriate, to agree any alterations to the existing boundary treatment, however, the proposed development does not preclude or prejudice any boundary treatment improvements along railway line to the immediate north. The submitted landscaping plan identifies that a new native hedgerow will be planted along the northern boundary, with three no. potential pedestrian/cyclist links catered for that will allow for permeability into the existing path along the northern boundary (upon agreement as necessary), all of which complies with the green infrastructure network as envisaged by the SDZ Planning Scheme. Please refer to the submitted landscape plan (drawing no. 01LP), boundary plan (drawing no. 02BP) and Additional Information Response document all prepared by RMDA for further details. It should also be noted that where any hedgerows are required to be removed, a native hedge will be planted to mitigate any loss from the development, and details of same are set out in the enclosed RMDA drawings and Additional Information Response document.

6. Built Form & Design

(a) Design Statement

The applicant is requested to submit an updated Design Statement that fully provides the information outlined under the Design Statements section of 2.8.2 of the Clonburris SDZ Planning Scheme.

Response:

Davey + Smith Architects have prepared the enclosed Architectural Design Statement – please refer to same. As part of the initial planning documentation submitted, a Design Statement was also enclosed and the current updated version ought to be read in conjunction with the initial statement submitted.



(b) External Finishes and Appearance Materials and finishes should be revised so that render is reduced or fully omitted from the development. The apartment balconies should have metal railings. Variation in materials and colours should be provided along the houses.

Revise Apartment Block A so that the 2 storey element is reduced in extent, the creche is relocated away from the public plaza and the ground floor is level with the plaza, further retail/commercial floorspace is provided/facilitated, and own door apartments are provided at ground floor level.

Privacy strips should be provided around any ground floor private open space on both apartment blocks.

Response:

Block A has been redesigned. The revised proposal now accommodates an enlarged plaza area to its immediate south providing a sense of enclosure. The proposed commercial / retail unit directly faces onto the plaza, at the same level as the plaza, with the proposed creche located to the rear of same, at the northern end of the ground floor, with associated play space. The ground floor of Block A accommodates a retail/commercial unit (c.325sq.m) and a creche (c.599sq.m). These non-residential uses have been increased in floor area from that initially proposed.

Block A is 3 storeys at its southern end rising up to 6 storeys at its northern end, and its elevational treatment is predominantly brick, with render fully omitted. Apartment balconies have been provided with metal railings. There are no ground floor apartments proposed.

(c) Block Form

Block form should be amended so that blocks address the roads to the rear of the duplexes facing the Link Road on the northern side. Compliance with the principles for perimeter blocks should be addressed.

Response:

The project architects, Davey+Smith has also prepared an AI response document and we refer the reader to same. However, the roads to the rear of the duplex block are considered to be local streets that run through the larger block form that fronts onto the east-west main link street, thereby keeping the overall block form in compliance with the principles for perimeter blocks as set out in the SDZ Planning Scheme. In addition, dual aspect houses are placed at the corners where the local street intersects the larger block form and the duplex blocks are also dual aspect, thus ensuring an active street frontage with passive surveillance onto the street from both sides, while delivering parking access to the duplex blocks and removing the parking requirement from the main link street, which is considered to be visually positive.

(d) Block Size

Block dimensions in the Development Areas that are contiguous to both urban centres should be no more than 100 metres. Larger or irregular blocks of up to 120 metres should be broken up using midblock penetration with short culde-sac/mews development to serve a small number of dwellings. The applicant should confirm that this has been addressed.

Response:

The enclosed site layout plan (Davey+Smith drawing no. 2004-PL-002) illustrates that this has been addressed and block sizes do not exceed these dimensions – please refer to same.



(e) Topography

Gradients on all Link Streets and Local Streets should be as gradual as possible with a gradient of between 1 in 33 (or 3%) and 1 in 20 (or 5%) targeted. In pedestrian streets and the urban squares a gradient change of between 1 in 33 (or 3%) shall be targeted and all surfaces should be smooth and continuous with a gentle slope while avoiding, where possible, steps in level. In some areas level changes will need to be carefully regraded. In other areas basement carparking, services or storage can be provided to raise building ground floor levels to the finished street or space level. The applicant should confirm that this has been addressed.

Response:

Please refer to the enclosed Pinnacle Engineering Drawing No. P200306-PIN-XX-DR-D-0020-S1which illustrates a typical road section and cross falls which are inline with the design standards suggested above.

(f) Facade Treatment

Distances between entrances should not exceed those set out in Table 2.8.1. 10m for Urban Centres – Primary and Secondary Retail Frontages and 9m for Local Streets – Residential. Figure 2.8.7 identifies Secondary Retail Frontages within the urban centre on the subject site. The applicant should confirm that this has been addressed.

Response:

The enclosed site layout plan (Davey+Smith drawing no. 2004-PL-002) illustrates that this has been addressed – please refer to same.

(g) Privacy and Overlooking

The applicant is requested to indicate separation distances on the proposed layout plan. Balconies for proposed apartments should also be indicated.

Response:

The enclosed site layout plan (Davey+Smith drawing no. 2004-PL-002) provides dimensions confirming separation distances – please refer to same.

(h) Sunlight and Daylight

No daylight, sunlight and overshadowing assessment has been provided. This should be submitted with particular regard to the proposed apartment buildings and associated open spaces.

Response:

3D Design Bureau (hereafter 3DDB) has prepared the enclosed "Daylight and Sunlight Assessment Report" which has assessed levels of daylight and sunlight in units of the proposed apartments (Blocks A and B only) along with a sunlight assessment and accompanying shadow study of the proposed public and communal open spaces across the entire site. Please refer to same for full details of the assessment.



The submitted assessment concludes that sufficient daylight provision was an important factor in the design process, 3DDB confirms that they worked closely with the project architects, Davey+Smith, to ensure the apartments, within the proposed Blocks A & B, performed well in this regard.

All habitable rooms within apartment Blocks A and B have been designed in a manner to allow good daylight access. Nevertheless, there are small number of rooms (3 no.) that do not achieve the recommended minimum levels of daylight. These rooms are all located on the south of Block A and have reduced levels of daylight due to the placement of trees adjacent the windows. These trees are a beneficial inclusion to the proposed design in terms a visual amenity and reduction of solar gains through shading. The inclusion of these trees was a conscious decision made by the design team in designing the required, enlarged urban plaza, in accordance with the SDZ Planning Scheme, despite the reduction of daylight in the identified units. It is put forward that the Planning Authority may attach a condition to a grant of permission requiring the omission of the trees that are affecting the aforementioned 3 no. rooms, however, it is considered that a more holistic approach to the overall design of the proposed development weighs more importance when one considered that Block A has been redesigned, the proposed urban plaza increased in size and designed in a manner whereby it can cater for a variety of amenity and recreational functions, and Block A not only forms the required enclosure to this space but the size of the ground floor non-residential uses have also been increased.

The assessment of sunlight exposure in the proposed apartments has yielded very positive results with the vast majority of assessed units achieving the recommended level of sunlight. Future occupants of the proposed development will also benefit from public and communal open spaces, all of which far exceed the recommended minimum level of sunlight as per the BRE Guidelines.

(i) Boundary Treatment

The proposed boundary treatment includes 1.2m high parkland metal railing along the sides of corner sites. This is not acceptable and should be replaced with a low wall or similar.

Response:

RMDA has prepared the submitted Boundary Plan (drawing no. 02BP) as well as an Additional Information Response document which illustrates where a 1.2m high parkland metal railing boundary treatment is proposed throughout the scheme. The reasoning behind proposing such a boundary treatment is in order to allow pollinator hedges of passive supervision to be part of the design development of the site, whereas walls are considered to be visually dominant, particularly at corner locations. We would refer the Planning Authority to the aforementioned RMDA documentation enclosed (particularly page 11 of the submitted Additional Information Response document) and to consider that the railing is a softer boundary treatment that will enable additional (pollinator) planting to be provided and mature across the site at a number of corner locations. Notwithstanding our proposal for the railing as opposed to a low wall, the applicant is willing to agree such details with the Planning Authority and/or accept a condition concerning this matter.

(j) Other

- Submit a building lifecycle report in line with the 2020 Apartment Guidelines.

Response:

Armstrong Fenton Associates has prepared the enclosed Building Life Cycle Report in accordance with section 6.13 of the 2020 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (hereafter referred to as the "Apartment Guidelines") – please refer to same.



- Submit further detail on the proposal solar/pv panels including sq.m and megawatt output.

Response:

As part of the initial planning application documentation submitted, an Energy Report, prepared by BBSC Building Services Consulting Engineers was included and contained in same, details on the proposal solar/pv panels including sq.m and megawatt output was addressed in the Energy Report as follows:

- 22_0322-CLO-BBSC-X-X-SP-Energy Statement P00.02-20220607 (section 9, Appendix 1)
- 22_0322-CLO-BBSC-X-X-SP-Utility Report P.00.02 20220601 (section 6, Appendix 2)

In addition, the PV calculations are enclosed - please refer to same.

7. Services & Infrastructure

(a) The applicant is requested to submit a letter of confirmation of feasibility from Irish Water for water supply and wastewater connections.

Response:

Pinnacle Consulting Engineers have prepared the civil engineering design proposals for the proposed development and have engaged with Irish Water. Please refer to the submitted cover letter by Pinnacle Consulting Engineers and to Appendix A of same for the Confirmation of Feasibility dated 22nd November 2022, as received in respect of the PCE application which was lodged with Irish Water. The Ref. No. in respect of same is CDS22007147. It should be noted that the pumping station and receiving pipe network were granted planning permissions under Planning Reg. Ref. No.'s SDZ21A/0006 & SDZ20A/0021 respectively and works are due to commence shortly on same.

In addition, and whilst not specifically requested as Additional Information, Pinnacle Consulting Engineers have prepared the enclosed drainage and watermain layout drawings to reflect the amendments made to the overall proposed development in responding to this request for AI. Please refer to their enclosed drawings:

- Dwg. No. P200306-200 Rev. P05 titled "General Drainage Layout",
- Dwg. No. P200306-201 Rev. P06 titled "General Watermain Layout & Levels".

(b) The applicant is requested to submit a noise impact assessment, carried out by appropriately qualified acoustician and competent persons, must be submitted in order to assess the potential impact of environmental noise from the railway line. The proposed noise assessment must assess if noise from the nearby train line will impact on the proposed development. Where deemed necessary a statement outlining recommended acoustic control measures that should be incorporated into the design and construction of the proposed residential units and/or site to ensure against adverse noise impacts on the occupiers must be included. South Dublin County Council Environmental Noise Action Plan 2018 – 2023 recommends that the noise impact assessment should demonstrate that all facets of the UK 'Professional Practice Guidance on Planning & Noise' (2017) (ProPG) have been followed.



Response:

Please refer to the submitted "Acoustic Design Statement" prepared by Byrne Environmental – please refer to same for full details. The submitted report notes that "the Dublin-Cork Rail Line is the principal existing ambient noise source that impact the subject site. Rail traffic noise associated with the Dublin Cork Rail Line which runs along the northern site boundary has been assessed by completing on-site noise measurements and by reviewing the EPA's Round 3 Rail Noise Mapping of this rail line. Rail noise dominates the northern site boundary during the daytime and night time periods albeit on a non-continuous basis". Section 5.5 of the enclosed Acoustic Design Statement asserts that the "highest measured vibration level at the closest building façade to the rail track was 0.06mm/sec PPV. The recorded levels are below the human perceptible range. The recorded levels are below the threshold for causing potential cosmetic or structural damage to the property".

It should also be noted that baseline noise levels were measured on 19th October 2022 and that at that time, all commuter and intercity rail services as well as freight train movements were operating normally during the 24-hour survey as confirmed by larnrod Eireann.

Section 7 of the submitted report states that "the recorded Daytime LAeq, 16hr and Night time LAeq, 8hr values at the footprint of the closest residential dwelling to the rial line were 60 and 50 dB(A) respectively which are in the Low risk range of the ProPG Assessment. The highest recorded night time LAFmax value was 82dB(A) and LAFmax values over 80 dB(A) occurred on more than 10 occasions during the night time period. The ProPG Noise Risk Assessment states that for low noise levels, the site is likely to be acceptable from a noise perspective provided that a good acoustic

design process is followed and is demonstrated in an Acoustic Design Statement which confirms how the adverse impacts of noise will be mitigated and minimised in the finished development".

Under section 8, mitigation measures are set out which recommend that the northern façades of the apartments and houses facing towards the rail track shall include acoustically rated glazing with a minimum Rw value of 37dB as indicated in Table 5 of the enclosed report to ensure that the internal environment of the building achieve the BS 8233:2014 internal acoustic design criteria as detailed in Table 1 of the enclosed report. In terms of ventilation, the submitted report recommends that the habitable rooms of houses facing towards the rail line shall have acoustically rated wall vents with an acoustic performance of at least 50dB Dn,e,w (C:Ctr). The apartment units shall be centrally mechanically ventilated and will not contain passive wall vents.

The submitted report concludes that "a comprehensive assessment of the inward noise impact that rail noise will have on the proposed development has been conducted with regard to the Professional Guidance on Planning & Noise (ProPG), 2017. Existing daytime and night time noise levels have been established by conducting noise measurements on-site at the proposed closest façade of properties to the Dublin-Cork Rail Line located to the north of the site. The measured rail noise levels when assessed in accordance with the Professional Guidance on Planning & Noise (ProPG), indicate that the daytime and night time noise levels are within the Low risk category. In order mitigate the inward noise impact and achieve the internal acoustic design criteria specified in BS 8233:2014, specific mitigation measures including acoustically rated windows and wall vents shall be integrated into the design of all identified units facades fronting towards the Dublin-Cork rail line".



8. Landscape & Open Space

The applicant is requested to submit the following:

(a) Green Infrastructure

A revised proposal that provides for the Strategic Green Corridor and Local Green Corridors as indicated in Figure 2.3.1 of the Planning Scheme. Street trees should be provided on both sides of local streets and homezones.

Response:

The submitted landscaping proposals allow for street trees to be provided, as far as is practical when one takes into account the space required for underground common, physical infrastructure to serve the proposed housing. The application site is already subject to permitted infrastructure (Ref. SDZ20A/0021) which we understand is to be delivered imminently, therefore there are some locations/wayleaves within the applicant site that will require details / locations of tree planting to be agreed with Irish Water. The applicant is fully engaging with those undertaking the permitted infrastructure works on the Kelland Homes Ltd. lands. RMDA's submitted landscape plan identifies the locations of the proposed planting, including street trees throughout, as well as providing details of sections and tree pits as set out in their submitted Additional Information response document – please refer to same.

(b) Trees and Hedgerows

A tree and hedgerow management plan that shows the amount of trees and hedgerow being removed and the amount of compensatory/replacement trees and hedgerow being planted as part of the proposals. To be in compliance with the SDZ and the requirement of no net loss of hedgerow across the scheme, the amount of compensatory/replacement hedgerow provided in this development shall be at least equal to that being removed. A bond will be required for all trees and hedgerows to be retained by the Planning Scheme.

Response:

Arborist Associates have prepared the submitted Arboricultural Impact Assessment, Tree Protection Plan and Tree Constraints Plan – please refer to same. Trees and hedgerows are to be retained, where possible, including the main north-south hedgerow running through the central open space being retained. Where any vegetation is proposed to be removed (i.e. total: 26 no. trees & 320 linear metres of hedgerow to be removed), it will be replaced by native species. The amount of trees of compensatory/replacement hedgerow provided in the development are greater than trees to be removed, therefore, there is no net loss of hedgerows provided in the development. A total of 354 no. new, proposed trees are proposed to be provided within the scheme, along with 933 linear metres of new native hedgerow to be planted, in conjunction with the retention of 21 no. trees and 233 linear metres of existing hedgerow. Therefore, the amount of compensatory / replacement trees and hedgerows being provided in the proposed development equates to more than that being removed.

(c) Surface Water Drainage

It is essential that open spaces accommodating SUDS measures such as attenuation ponds and swales are designed in order to achieve a balance between surface water management and high-quality open space. The applicant is requested to confirm that the attenuation tanks will not preclude the retention and protection of the existing north south hedgerow/tree line. If required these tanks should be moved to facilitate this. The permitted attenuation pond in the south-east corner of the site should be fully incorporated into the landscape and open space proposals. Further above ground SUDS measures should be incorporated into the overall proposal.



Response:

The permitted attenuation tanks permitted (under Ref. SDZ20A/0021) will not be altered by way of this current proposed development. Furthermore, 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 and the necessary measures put in place to ensure its retention.

As can be seen from the submitted landscape plans, the permitted attenuation pond in the south-east corner of the site is fully incorporated into the landscape and open space proposals and an enlarged area of open space to its immediate west now fully incorporated into the public open space, as per the submitted site layout plan and landscape plan, with a path and congregation space incorporated into this area. The planting shall be suited to wet/moist conditions, and all above ground SUDS measures will be incorporated into the overall proposal via the use of paths, seating, planting of trees and wildflower meadows.

(d) Landscape Plan

A revised detailed landscape plan, to be agreed with Public Realm, with full works specification, that accords with the specifications and requirements of Council's Public Realm Section. The revised landscape plan shall integrate retained and enhanced hedgerows and trees, tree planting and SuDS drainage to provide strong green infrastructure links throughout the development in accordance with Clonburris SDZ Planning Scheme, Parks and Landscape Strategy and Biodiversity Management Plan.

The revised Landscape Proposals shall incorporate:

i. Street trees that are in line with the requirements set out in the Clonburris Strategic Development Zone Planning Scheme (Clonburris SDZ) 2019' and the 'Design Manual for Roads and Streets (DMURS) 2019.

Response:

Street trees are provided throughout the proposed development, with a full planting list schedule on the submitted RMDA Landscape Plan (drawing no. 01LP), a total of 354 no. trees are proposed to be planted, in addition to the 21 no. trees being retained on site.

ii. Street tree provision to incorporate small scale SuDS features that enhance biodiversity, provide amenity, manage surface water volume while providing water quality treatment.

Response:

Street trees will incorporate small scale SUDS features that will enhance biodiversity, amenity, manage surface water volume while providing water quality treatment. Details of where tree pits are to be located are identified in the submitted RMDA Additional Information Response document (page 18), as well as plans of typical tree pits proposed – please refer to same. In addition, we understand that as part of the permitted infrastructure (under Ref. SDZ20A/0021) contains a series of tree pits along the main east-west access road.

Details of street tree planting to be submitted to the Public Realm Section of SDCC for agreement. Urban tree pits to include SUDs measures / storm water attenuation. The developer shall submit cross section details of the SUDs tree pits, including growing and drainage/storage media.

Response:

Please refer to page 19 of the submitted RMDA Additional Information Response document which provides sections and details of the proposed street tree pits.

iv. Street trees size at planting a minimum of 18 to 20-centimetre girth (cmg) within local streets and a minimum of 16 -18 cmg on intimate local streets (homezones) as per the requirements of the Clonburris SDZ Parks and Landscape Strategy.

Response:

Please refer to the submitted RMDA Landscape Plan (drawing no. 01 LP) which provides details of the type and location of the proposed street trees to be provided throughout the proposed development. In addition, please also refer to page 20 of their Additional Information Response document which asserts that the maximum size for the trees should be 16-20cm) but that street sizes will be provided at a minimum of 18-2cm girth and shall follow the requirements as per the Clonburris SDZ Parks and Landscape Strategy.

v. Retained, removed and compensatory hedgerow and trees to be clearly identified on Landscape Plans.

Response:

In addition to the submitted arboricultural drawings and impact assessment, prepared by Arborist & Associates, please also refer to the submitted RMDA drawing no. 07 L&AP "Landscape & Arborist Plan" which overlays / incorporates the arborist's plans with the proposed landscaping plans. A simplified version is also illustrated on page 21 of the submitted RMDA Additional Information Response document, which illustrates:

- a) the hedgerows to be augmented, removed and new native hedgerow to be planted,
- b) the existing trees to be retained and removed, and
- c) all of the new tree planting to be delivered by the applicant.

vi. Parkland/Open Space tree planting to include a range of semi-mature specimens that are a minimum of 20-25cmg and specimen ornamental trees to include trees that are 30-35 cmg.

Response:

Please refer to the submitted RMDA Landscape Plan (drawing no. 01 LP) which provides details of the type and location of the proposed parkland / open space trees to be provided throughout the proposed development. RMDA asserts that parkland/open space tree planting will include a range of semi mature specimens at 20-25cmg and ornamental specimen trees at 30-35cmg. Please also refer to page 22 of the submitted RMDA Additional Information Response document which provides a simplified plan for the location of the parkland / open space trees to be provided, along with details of the type and size of trees proposed.

VII. Details of all natural SuDS features including swales, rain gardens, bioretention tree pits, channel rills, filter strips, ponds, detention basins with lower areas allowed to fill first (low flow channels), wetlands etc.

Response:

A number of SuDS features are proposed throughout the development, details of which were prepared and submitted by Pinnacle Engineering as part of the initial planning application documentation.

As part of this AI response, RMDA have provided details of tree pits throughout the proposed development. The permitted surface water attenuation pond in the south-east corner will be augmented with wetland planting with an extended area of open space abutting same to the west now proposed.

Green roofs are also proposed in 4 no. locations, on apartment Blocks A and B, and duplex Blocks E and K. Details of same are also set out on page 24 of the submitted RMDA Additional Information Response document – please refer to same.

viii. All hard and soft landscape details; including levels, sections and elevations.

Response:

Please refer to the submitted RMDA Landscape Plans and Sections (drawing no.s 01LP, 03(i) SCT, 03(ii) SCT) which provide details of all hard and soft landscape details; including levels, sections and elevations. Further landscape details are also set out on the enclosed RMDA drawing no.s 04(i) LDP & 04(ii) LDP.

ix. A fully detailed Planting Plan clearly setting out the Location of species types, schedule of plants noting species, planting sizes and proposed numbers/densities where appropriate.

Response:

Please refer to the submitted RMDA Landscape Plan (drawing no. 01LP) and Planting Plans (drawing no.s 06 LPP(i) to 06LPP(vi)) which provide details of the location of species types, schedule of plants noting species, planting sizes and proposed number / densities, where appropriate.

x. Landscape masterplan/planting plan to clearly delineate street lighting to ensure street tree proposals are realistic. If this is not currently the case, proposals to be revised to ensure street tree delivery.

Response:

Please refer to the submitted RMDA Landscape Plan (drawing no. 01LP) which clearly delineates street lighting to ensure tree proposals are realistic. Trees have been placed at a minimum of 5m away from light standards to avoid any potential clashes. A simplified version is also provided on page 26 of the submitted RMDA Additional Information Response document – please refer to same.

xi. Tree and hedgerow protection measures: show extent and position of tree and hedgerow protection fences.

Response:

Arborist Associates have prepared the submitted Tree Protection Plan (drawing no. CBC002) which identifies that tree and hedgerow vegetation both being retained and removed. This drawing also illustrates the area of the work exclusion zone / protective fence line that will protect the work exclusion zone around the trees that are being retained, as well as a details of the type of protective fence recommended – please refer to same. In addition, the submitted RMDA Additional Information Response document (page 27) illustrates where the tree & hedgerow protection lines will be around the extent of the tree and hedgerow lines that are being retained and protected. As noted above, Kelland Homes Ltd will ensure that the hedgerow/treeline that are to be retained on site 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 the necessary retention proposals will be protected and implemented.

xii. Tree Impact Plan

Response:

Arborist Associates have prepared the submitted Arboricultural Impact Assessment - please refer to same.

xiii. Implementation timetables.

Response:

It is intended that the proposed development will be carried out in three phases, which we have identified as being Phases K1, K2 and K2A – refer to page 28 of the submitted RMDA Additional Information Response document to identify the locations of the proposed phasing. As part of the proposed phasing of the development, the associated planting and delivery of open spaces and landscaping will be carried out in tandem with the delivery of housing etc. as per each phase and the proposed planting done at the appropriate times of the year for same, per phase.

xiv. Grassed areas and slopes need to provide for safe grass cutting (generally 1 in 8 slope, max 1 in 6) with ride on lawn mowers or tractor with a 16 foot mower pulled behind.

Response:

Grassed areas and slopes shall have slopes of 1 in 8, max 1 in 6.

xv. Detailed proposals for the future maintenance/management of all landscaped areas.

Response:

RMDA Landscape Architects have prepared the submitted landscape specifications schedule and maintenance document for future management of all landscape areas within the proposed development – please refer to same.

Lockable (preferably automated) vehicular access to local parks and that maintenance vehicular access is possible where required throughout the park area.

Response:

No automated vehicular access is required as part of the proposed development.

xvii. Boundary details and planting to be to taking in charge standard and to be agreed with SDCC Public Realm.

Response:

The proposed boundary details and planting are to "taken in charge" standard and RMDA asserts that they have been sent to SDCC public realm section for agreement. In any event, the applicant intends to agree all boundary details and planting with the Planning Authority prior to delivering same on site.

xvii. Local Park boundaries to have railing suitable to public realm, i.e. a permanent low wall with heavy duty round bar, minimum 16mm diameter galvanised and powder coated matt black metal railing, 1.8m high, suitable for public realm or a permanent 2m high wall.

Response:

It is not proposed to amend the existing boundary treatment running along the northern and eastern boundaries and as outlined above, the adjoining lands abutting same are in third party ownership. Any alterations to same will require agreement with the landowner, to which the applicant has no objection.

It is proposed to provide a stone butt wall with bowtop railing along the western boundary of the site. Please refer to the submitted RMDA Boundary Plan (drawing no. 02BP) and also to page 29 of the submitted RMDA Additional Information Response document for details.

xix. All areas proposed for taking in charge shall be to a taking in charge standard that ensures ease of maintenance including ease of access. Soft landscape areas intended for taking in charge should predominantly consist of grass, hedges, trees, woodland planting, meadowland or bulb planted areas using predominantly native and/or pollinator friendly species and comply with the requirements of the Clonburris SDZ Biodiversity Management Plan. Trees to be grouped appropriately to enable access to meadows for cutting.

Response:

Please refer to the submitted "Taking In Charge" drawing by Davey+Smith Architects (drawing no. 2004-PL006) which identifies the areas that are proposed to be taken in charge (TIC), post completion of the proposed development. All TIC areas proposed will be delivered to taking in charge standard to ensure ease of maintenance and ease of access.

Trees have been grouped up to enable access to meadow cutting. Soft landscape areas such as grass, hedges, trees, woodland planting, meadowland or bulb planting consist of predominately native and/or pollinator friendly species and comply with the requirements of the Clonburris SDZ Biodiversity Management Plan. Please refer to the submitted RMDA Planting Plans (drawing no.s 06 LPP(i) to 06LPP(vi)) and to page 30 of the submitted RMDA Additional Information Response document for a simplified version of the overall planting plan.

a. avoid use of ornamental ground cover or ground cover or treatments that need intensive maintenance or herbicide

Response:

No groundcover planting is proposed in public areas, while only shrubs will be provided to private areas to provide defensive space and wildflowers and bulbs will be provided to areas of open space.

b. extensive areas of herbaceous perennial ground cover should also be avoided.

Response:

No perennial ground cover is proposed to be used, and extensive areas of herbaceous perennial groundcover shall be avoided.

c. minimise the use of shrubs that require regular maintenance

Response:

No shrubs are proposed to be located in open space, only located to private areas and house fronts.

d. the exception to the planting criteria above are the planted swales required for SuDS where riparian planting is required. Swales to be planted with wildflowers.

Response:

Appropriate wildflower mix is proposed to be planted in swales, with the selected plant list suitable for moist conditions – please refer to the RMDA Landscape Plan (drawing no. 01LP) for planting list.

xx. Open space shrub planting to be native and include pollinator friendly species. Suitable species include hazel Corylus avellana, wild privet Ligustrum vulgare, guelder rose Viburnum opulus and yew Taxus baccata.

Response:

No shrub planting is proposed to be located in open space. Corylus avellana, privet, guelder rose shall be incorporated into native hedge planting.

xxi. Native species shall be used for formal hedging proposed within Clonburris SDZ e.g., residential. Suitable species include hazel Corylus avellana, wild privet Ligustrum vulgare, guelder rose Viburnum opulus and yew Taxus baccata.

Response:

The proposed native species for open space is to be Craetagus monogyna, Corylus avellana, Ilex aquifolium, Guelder rose, Viburnum opulus & Ligustrum vulgare. Private Gardens shall be provided with Ligustrum spp.

xxii. Woodland planting should use the Miyawaki technique (3-5/m2) in order to establish quickly and reduce maintenance costs. This will require an establishment period and maintenance of 5 years for newly planted woodland areas prior to taking in charge.

Response:

It is proposed that woodland planting will follow the Miyawaki technique. It is expected that the taking in charge shall be a maximum of 18 months from completion of the development.

xxiii. Paths to be a permeable solid surface within flood attenuation areas.

Response:

Paving shall be dust to attenuation area to avoid hydrocarbons from tarmac.

xxiv. All playspace surfacing to be engineered woodchip surfacing.

Response:

All playspace surfacing will be provided with engineered woodchip surfacing.

xxv. Any sand play areas to be enclosed with fencing.

Response:

None of the proposed play areas include sand areas.

xxvi. Details of all play items and natural play features to be provided and agreed with SDCC Public Realm Section.

Response:

Details of the proposed play items, including natural play items are provided in the submitted RMDA Additional Information Response document (page 34) and prior to implementation will be agreed with the SDCC Public Realm Section.

xxvii. The relevant requirements of the Clonburris Parks and Landscape Strategy & xxviii. Landscape Proposals to reflect the requirements of additional information items relating to green infrastructure.

Response:

It is considered that the landscape proposals put forward for permission maximises the realistic retention of high value existing landscape features such as the main north-south hedgerow through the central open space, and the creation of a new urban plaza, both of which are appropriate for the future urbanised context of the SDZ lands as set out in the Planning Scheme. The proposed landscaping strategy seeks to retain and enhance the existing vegetation and facilitate and ameliorate green links where possible. The landscape strategy has also taken into account strategic, permitted infrastructure to serve all of the SDZ lands, with the applicant liaising with contractors and project managers for the delivery of the permitted infrastructure in order to ensure that trees and hedgerows are retained where identified

as such. The permitted surface water attention pond in the south-east corner will be appropriately landscaped and incorporated into the overall landscaping strategy and open space delivery of the scheme. Careful consideration has been paid to the proposed landscaping to integrate the permitted infrastructure as set out in the SDZ Planning Scheme sensitively within the landscape strategy. New green spaces will be interconnected with existing green infrastructure to form biodiversity corridors

Existing vegetation is to be retained where possible and carefully managed in accordance with the specifications of a qualified arborist. Additional planting is to be incorporated to supplement loss of vegetation and to improve the proportion of native species on site, particularly the extensive native hedgerow planting. There is no net loss of planting on site as a result of the removal of any existing planting. Where connections are to be facilitated along the northern boundary, in agreement with third parties, all works will be coordinated with an arborist and ecologist as necessary.

The landscape strategy has had regard to the submitted Biodiversity Management Plan, and wildflower meadow planting is proposed in line with the All Ireland Pollinator Plan.

(e) Play

Proposals that demonstrate details of all play items, natural play features and safety surfacing are required. All play areas must be universally accessible. The applicant is recommended to contact Public Realm section to agree details of the natural play proposals.

Response:

The submitted landscaping proposals demonstrate details of all play items, natural play features and safety surfacing. The project landscape architects, RMDA, met with Laurence Colleran on 17.11.2022, to agree details of the natural play proposals. Details of the proposed play items are set out on page 34 of the submitted RMDA Additional Information Response document – please refer to same. It should also be noted that the proposed roundabout play item will be universally accessible.

(f) Biodiversity Management Plan

A site-specific Biodiversity Management Plan demonstrating compliance with the Clonburris BMP.

This should include details of any site clearance works and/or the establishment of access routes and site compounds. The applicant is advised to contact SDCC Heritage Officer prior to the preparation of the BMP. The BMP shall be devised by a qualified and experienced ecological expert/ecological team who can demonstrate previous experience of devising and implementing such a plan. The BMP shall clearly demonstrate how it proposes to adhere to and implement the ecological objectives and recommendations of the Clonburris SDZ Scheme, the Clonburris SDZ Biodiversity Management Plan, and the Parks and Landscape Strategy. Particular focus is to be placed on demonstrating the retention and enhancement of:

- An appropriate level of existing biodiversity,
- the robust and sustainable nature of any proposed replanting,
- the strengthening of exiting GI links, and
- the creation of new and appropriate green infrastructure.

The BMP will clearly indicate how the implementation of the BMP will be monitored, with appropriate remediation measures where shortfalls may occur. SDZ planning scheme within the development.



Response:

RSK has prepared the enclosed Biodiversity Management Plan (BMP) – please refer to same for full details. The submitted BMP proposes a suite of measures, which attempt to lessen the impact of the proposed development and these have been incorporated into the submitted Ecological Impact Assessment (EcIA). These include but not limited to:

- Creation of 933m of new native, species-rich hedgerow,
- Measures to retain and enhance 233m of existing hedgerows,
- Planting of 361 native, species-rich trees,
- Installation of a wildlife pond,
- Planting of wildflower meadows,
- Maintain and enhance connectivity of habitats on the site.

The submitted BMP proposes that appropriate measures are monitored for a period not less than 20 years to fulfil the aims and objectives of the BMP.

9. EIA

The submitted EIA Screening & Statement in Accordance with Article 299B(1)(B)(II)(II)(C) of the Planning and Development Regulations 2001-2021 refers to the proposal as a BTR and grid connection development under section 3.2.1. This should be revised to refer to the subject development.

Response:

We confirm that the proposed development is not a Build-to-Rent (BTR) development and that any reference to same was an error. Notwithstanding same, an updated EIA Screening & Statement in Accordance with Article 299B(1)(B)(II)(C) of the Planning and Development Regulations 2001-2021 has been prepared by RSK and is submitted as part of this application for permission – please refer to same.



10. A full revised schedule with proposed units, floor areas and open space provision shall be provided. The schedule shall also provide details of compliance with Section 2.13 of the Planning Scheme

Response:

The proposed development has been revised, now consisting of 283 no. dwellings, crèche and 2 no. retail / commercial units. The proposed residential dwellings are comprised of:

- 112 no. 2, 3 & 4 bed, 2 storey semi-detached and terraced houses,
- 110 no. 1, 2 & 3 bed duplex units accommodated in 11 no. 3 storey buildings, and
- 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).

These non-residential uses have been increased in floor area from that initially proposed.

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, the design of same caters for flexibility/adaptability and the location of same are adjacent to the proposed plaza.

An updated Housing Quality Assessment has been prepared and is enclosed as a separate document – please refer to same for full details of the size of the proposed dwellings, internal rooms sizes, storage, private open space etc.

All of the response details set out above under items 1 and 2 above demonstrate the proposed development's compliance with Section 2.13 of the SDZ Planning Scheme and we refer the reader to same, when assessing our response to this item also.

The open space provision on site is a total of 14,025m² (1.4Ha) which equates to 22% open space provision within the application site.

A summary of the revised schedule of the proposed units, outlining proposed unit type, number and floor areas is set out overleaf:



Proposed Houses:

House Type	Description	No. of Units	Floor Area (m²)	Total Floor Area (m²)
A1	2 storey, 3 bed end terrace	40	107.4	4,296
A2	2 storey, 3 bed mid terrace	42	107.4	4,510.8
A3	2 storey, 3 bed end terrace	5	107.4	537
В	2 storey, 2 bed end terrace	13	86.2	1,637.8
C1	2 storey, 4 bed semi-detached	9	132.8	1,195.2
C2	2 storey, 4 bed semi-detached	3	132.8	398.4
Total		112		12,575.2m²

Table 3: Proposed House Types.

House Type	2 bed	3 bed	4 bed	Total
No. of Units	13	87	12	112
% Mix	11.60%	77.67%	10.71%	100%

Table 4: Total Proposed House Type Mix.

Proposed Duplexes:

Duplex Blocks A, B, E, G, H, I & J:

Description	Floor	No. of Units	Floor Area (m²)	Total Floor Area (m²)
2 bed / 4 person apartment	Ground	11	77.3	850.3
2 bed / 4 person apartment	Ground	29	74.4	2,157.6
3 bed / 5 person duplex	First & Second	40	111.8	4,472
Total		80		7,479.9 m²

Duplex Blocks C & D:

Description	Floor	No. of Units	Floor Area (m²)	Total Floor Area (m²)
2 bed / 4 person apartment	Ground	10	73.1	731
2 bed / 4 person apartment	Ground	2	76	152
3 bed / 5 person duplex	First & Second	12	109.2	1,310.4
Total		24		2,193.4m ²



Duplex Block K:

Description	Floor	No. of Units	Floor Area (m²)	Total Floor Area (m²)
3 bed / 5 person duplex	Ground & First	1	111.8	111.8
3 bed / 5 person duplex	Ground & First	1	108.4	108.4
3 bed / 5 person apartment	Second	1	100.6	100.6
1 bed/ 2 person apartment	Second	1	49.4	49.4
2 bed / 4 person apartment	Third	1	79.8	79.8
3 bed / 5 person duplex	Third	1	68.2	68.2
Total		6		750.6 m ²

Table 5: Proposed Duplex Types

Duplex Type	1 bed / 2 person apartment	2 bed / 4 person	3 bed / 5 person	Total
No. of Units	1	53	56	110
% Mix	0.9	48.1	50.9	100%

Table 6: Total Proposed Duplex Type Mix.



Proposed Apartments:

Block A:

Unit No.	Apartment Type	Floor Area (m²)
1	1 Bed / 2 Person	49.4
2	1 Bed / 2 Person	49.4
3	1 Bed / 2 Person	49.4
4	2 Bed / 4 Person	67.1
5	1 Bed / 2 Person	57.4
6	2 Bed / 4 Person	76.2
7	2 Bed / 4 Person	74.9
8	1 Bed / 2 Person	50.8
9	2 Bed / 4 Person	75.2
10	2 Bed / 4 Person	75.2
11	2 Bed / 4 Person	75.2
12	1 Bed / 2 Person	56.2
13	1 Bed / 2 Person	49.4
14	1 Bed / 2 Person	49.4
15	1 Bed / 2 Person	49.4
16	2 Bed / 4 Person	67.1
17	1 Bed / 2 Person	57.4
18	2 Bed / 4 Person	76.2
19	2 Bed / 4 Person	74.9
20	1 Bed / 2 Person	50.8
21	2 Bed / 4 Person	75.9
22	2 Bed / 4 Person	75.2
23	2 Bed / 4 Person	75.2
24	1 Bed / 2 Person	55.8
25	1 Bed / 2 Person	50.8
26	2 Bed / 4 Person	75.2
27	2 Bed / 4 Person	75.2
28	2 Bed / 4 Person	74.8
29	1 Bed / 2 Person	56.1
30	1 Bed / 2 Person	54.7
31	2 Bed / 4 Person	75.2
32	2 Bed / 4 Person	75.2
33	2 Bed / 4 Person	75.2
34	1 Bed / 2 Person	53
35	1 Bed / 2 Person	50.8
36	2 Bed / 4 Person	75.2
37	2 Bed / 4 Person	74.8
38	2 Bed / 4 Person	74.8
39	1 Bed / 2 Person	56.1
Total = 39 no.		25,10.2 m ²

Table 7: Proposed Apartments in Block A.



Block B:

Unit No.	Apartment Type	Floor Area (m²)	
1	1 Bed / 2 Person	48	
2	1 Bed / 2 Person	52.3	
3	1 Bed / 2 Person	57.1	
4	2 Bed / 4 Person	81.7	
5	2 Bed / 4 Person	84.5	
6	2 Bed / 4 Person	86.4	
7	1 Bed / 2 Person	48	
8	1 Bed / 2 Person	52.3	
9	1 Bed / 2 Person	57.1	
10	2 Bed / 4 Person	81.7	
11	2 Bed / 4 Person	84.5	
12	2 Bed / 4 Person	86.4	
13	2 Bed / 4 Person	80.9	
14	2 Bed / 4 Person	80.6	
15	2 Bed / 4 Person	81.7	
16	2 Bed / 4 Person	84.5	
17	2 Bed / 4 Person	86.4	
18	2 Bed / 4 Person	80.9	
19	2 Bed / 4 Person	80.6	
20	2 Bed / 4 Person	81.7	
21	2 Bed / 4 Person	84.5	
22	2 Bed / 4 Person	erson 86.4	
Total = 22 no.		1,648.2m²	

Table 8: Proposed Apartments in Block B

Apartment Type	1 bed / 2 person	2 bed / 4 person	Total
No. of Units	24	37	61
% Mix	39.3%	60.6%	100%

Table 9: Total Proposed Apartments.



Dwelling Type	1 bed	2 bed	3 bed	4 bed	Total	Percentage %
Houses	0	13	87	12	112	39.57%
Apartments	24	37	0	0	61	21.5%
Duplex	1	53	56	0	110	38.8%
Total	25	90	143	12	283	100%
Percentage %	8.8%	31.8%	50.5%	4.2%	100%	-

Table 10: Overall Proposed Dwelling Mix



Conclusion:

- 4.1 We consider that all the items that required Additional Information have been fully addressed. Kelland Homes Ltd. are seeking permission for a mixed-use / residential development which, as revised by this AI response, is comprised of 283 no. houses, apartments and duplex units, together with a childcare facility and 2 no. retail / commercial units, on a site measuring c. 6.3Ha, 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.
- **4.2** It is considered that the Applicant's design team have appropriately accommodated all items that required Additional Information. The proposed Block A has been redesigned and the adjoining urban plaza both enlarged and enclosed. A new Block K has been introduced that accommodates both residential and non-residential uses, with an overall increase in retail/commercial floorspace now provided for. Significant landscaping details have been prepared, in conjunction with the arborist's recommendations, most importantly, the applicant. intends to protect and retain the north-south hedgerow located in the central area of open space.
- **4.3** The project architects have clearly demonstrated what development may look like on the adjoining third party lands such that all development proposals, both current and future, can fully comply with the objectives and standards of the SDZ Planning Scheme. While the number of units has decreased slightly, the required quantum of development can still be achieved, without prejudicing future development on adjoining lands.
- **4.4** The application site is subject to permitted infrastructural works required to serve not only the subject site but the adjoining lands within the SDZ. Cognisance has been paid to same, with no alterations to permitted infrastructure proposed as part of this application for permission. It should be noted that the applicant is engaging with the contractors and project managers for the permitted infrastructural works to ensure that important vegetation on site is to be protected and retained.
- **4.5** The project architects have made the necessary architectural changes to the proposed buildings to provide a greater degree of architectural interest and passive surveillance to the public realm. A Building Lifecycle Report has been prepared for the management of the development.
- **4.6** The submitted Road Safety Audit demonstrates that the proposed road network will be safe and accessible for all users, including pedestrians, cyclists and large vehicles. All the proposed residential units have been designed to meet the most up to date design and living standards, which in this case are the guidelines for 'Sustainable Urban Housing: Design Standards for New Apartments' (2020).
- **4.7** Revised landscaping plans ensure that the development will provides for welcoming, useable spaces, with active and passive landscaped areas offering recreational space for persons of all ages. These landscaping / planting proposals have been considered with regard to the submitted public lighting proposals.
- **4.8** The project ecologists, RSK have updated the necessary ecological and environmental reports as requested. A noise impact assessment has also been prepared and we refer the reader to these enclosures for full details.
- **4.9** In compliance with the requirements of Part V of the Planning and Development Act 2000 (as amended), the Applicant proposes to offer 62 no. residential units on the site, representing 20% of the total number of residential units proposed, as social & affordable housing, with details of the unit types and costs associated with same also enclosed.
- **4.10** In summary, the proposed development is considered to provide for the efficient use of currently unused lands strategically identified for housing, providing for high quality architectural design, connectivity and direct pedestrian and cycle linkages to the surrounding areas.



- 4.11 It is fully considered that the Applicant and their design team have made a genuine effort to design a high-quality scheme which makes efficient use of currently unused lands zoned for residential development and which are in close proximity to existing public transport infrastructure. It is considered that proposed development is sympathetic to its surrounding environs and will provide for much needed housing in the west Dublin area. It is also considered that the proposed development is befitting of the site's location and will seamlessly integrate into the existing receiving environs but will complement future development of the remainder of the SDZ lands. Cognizance must be paid to the fact that this application for permission represents one of the initial phases in the entire SDZ and it will not impact on the delivery of future housing/development, as per the Planning Scheme, on adjoining lands within the SDZ. Furthermore, the applicant Kelland Homes Ltd has owned these lands for many years and has gone through the making of two SDZ Planning Schemes at Clonburris. Having delivered thousands of homes in the County, they are now well placed to commence the development of their lands at Clonburris, and we request that the Planning Authority considers same in assessing this application for permission.
- **4.12** We consider that the proposed development accords with the proper planning and sustainable development of the area and as such ought to be granted permission. The applicant's design team has liaised with the various internal departments of SDCC as required to agree in principle details of design, planting, landscaping etc. and as a result, the revisions to the scheme are put forward for permission.
- **4.13** We trust that the Planning Authority will give due consideration to the merits of the subject application, and we look forward to a favourable decision in due course. Please refer to the pages over for a full list of enclosures.

Yours faithfully,

Tracy Armstrong, BA, MRUP, MIPI, MRTPI

Managing Director,

Armstrong Fenton & Associates.



Enclosures:

We enclose six copies of the following in support of this submission of Additional Information:

Prepared by Armstrong Fenton Associates, Planning & Development Consultants:

Document / Drawing No.	Title	Scale
N/A	Subject Cover Letter	A4 Letter
N/A	Planning Report	A4 Document
N/A	Housing Quality Assessment	A3 Document
N/A	Building Life Cycle Report	A4 Document

Prepared by Kelland Homes Ltd:

Document / Drawing No.	Title	Scale
N/A	Part V Proposal	A4 & A3 document

Prepared by Davey + Smith Architects:

Drawing/Document No.	Description	Scale
N/A	Architectural Design Statement	A4 Document
N/A	Al Response Document	A3 Document
2004-PL 001	Site Location Map	1:1000 @ A2
2004-PL 002	Proposed Site Plan	1:500 @ A0
2004-PL 003	Proposed Site Plan with Masterplan	1:500 @ A0
2004-PL 004	Site Section A	1:200 / 1:500 @ A1
2004-PL 005	Site Selection B	1:200 @ A1
2004-PL 006	Taking in Charge	1:1000 @ A2
2004-PL 007	Part V Proposal	1:1000 @ A1
2004-PL 009	Residential Waste Management	1:1000 @ A2
2004-PL-010	Developable Areas Map	1:2000@A3
PH001- HT A1 – 3B End Terrace	Proposed Plans, Section & Elevations	1:100 @ A1
PH002- HT A2- 3B Mid Terrace	Proposed Plans, Section & Elevations	1:100 @ A1
PH003- HT A3- 3B End Terrace	Proposed Plans, Section & Elevations	1:100 @ A1
PH004- HT B- 2B Mid Terrace	Proposed Plans, Section & Elevations	1:100 @ A1
PH005- HT C1- Wide Front Semi	Proposed Plans, Section & Elevations	1:100 @ A1
Detached	Resilience of the second of th	
PH006- HT C2- Wide Front Semi	Proposed Plans, Section & Elevations	1:100 @ A1
Detached		
PH007- Apartment Block A	Ground & First Floor Plan	1:200 @ A1
PH008- Apartment Block A	Second & Third Floor Plan	1:200 @ A1
PH009- Apartment Block A	Fourth, Fifth Floor & Roof Plan	1:200 @ A1
PH010- Apartment Block A	Elevations	1:200 @ A1
PH011- Apartment Block A	Sections	1:200 @ A1
PH 012- Apartment Block B	Grounds & First Floor Plan	1:100 @ A1
PH 013- Apartment Block B	Second & Third Floor Plan	1:100 @ A1
PH 014- Apartment Block B	Roof Plan	1:100 @ A1
PH 015- Apartment Block B	Section & Elevations	1:100 @ A1
PH 016- Duplex Block	A, B, F, G, H, I, & J End Unit A- Floor Plans,	1:100 @ A1
	Sections & Elevations	
PH 017- Duplex Block	A, B, F, G, H, I, & J End Unit B- Floor Plans,	1:100 @ A1
	Sections & Elevations	
PH 018- Duplex Block	A, B, F, G, H, I, & J Mid Unit - Floor Plans,	1:100 @ A1
	Sections & Elevations	