

Alison Clarke,  
Module  
1st Floor  
2, Chapel Hill  
Lucan  
Co. Dublin

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

<b>Decision Order Number:</b> 1604	<b>Date of Decision:</b> 15-Dec-2022
<b>Register Reference:</b> SD22A/0406	<b>Registration Date:</b> 26-Oct-2022

**Applicant:** Alan & Monica Holmes

**Development:** Demolition of an existing commercial two storey building and the construction of 2 commercial units with Plantroom on Ground floor level with 8 residential apartments comprising 2 one Bed apartments 3 two bed apartments and 3 three bed apartments all with private balconies over 4 floors; A communal roof garden is located on the fourth floor; Enclosed bin stores for the commercial and residential units is located at the rear of the building; 5 total car parking spaces including 1 disabled car space is provided; 8 bicycle spaces are provided at the front for commercial units and 10 no. bicycle spaces at the rear for residential units; Sustainable drainage (SuDs) roof and roof garden are provided for the development and all associated engineering and site works necessary to facilitate the development.

**Location:** Paintworld, 1-2 Ballymount Road Lower, Dublin 12

**Application Type:** Permission

Dear Sir /Madam,

With reference to your planning application, received on 26-Oct-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. A new development plan has been effective within South Dublin since August 3rd 2022. This has not been accounted for in the application pack provided. The applicant is requested to review the proposed development, and associated reports and drawings, and ensure that the development appropriately responds to the policies and objectives of the South Dublin County Development Plan 2022 – 2028. The applicant should have specific regard to policies and objectives in relation to the

design of the building, Section 5.2.1 And 12.5.2 in relation to ‘The Plan Approach’, and Appendix 10 ‘Building Height and Density Guide’.

2. If developed, this building will set a precedent for development in the area. The quality of the design of this proposal is therefore critical for the success of this site, and the wider area. The scheme, as currently designed, is not considered acceptable or appropriate, the following should be addressed by way of revisions:
  - a) The height of the building is considered to be excessive, when viewed in the context of the surrounding area, the nature of development immediately bounding the site, and the overall character of the area as an established mixed-use neighbourhood. The applicant is requested to reduce the height of the building to 3-storeys (with the top floor inset), to better reflect the pattern of development in the area. The applicant is strongly encouraged to revise the scheme, and provide an updated rationale for the design, with regard to Appendix 10 of the Development Plan 2022 – 2028.
  - b) While the principle of increased density at the site are acceptable, the proposed plot ratio of 2.2 is excessive. A plot ratio of 0.75-1 would be more appropriate to this location. The site coverage of 54% and the absence of any open space proposals also suggest overdevelopment, the applicant is requested to address these concerns and revise the density downwards.
  - c) The front elevation and building form is not considered to provide a high quality design, and instead is considered to maintain many of the same concerns of the previous application in relation to the design, bulk and mass of the building. The front elevation is considered to be monotonous and does not provide visual interest. The setback of the top floor is welcomed however, there is minimal articulation in the façade, with the projecting element only adding to an impression of bulk. The applicant is requested to revise the scheme, utilising fenestration and setbacks as well as materials to improve the quality of the design.
  - d) There are concerns about the proximity of the building footprint to the red line boundary, and the potential impact and extent of development at this site might have on future development lands to the south, along Greenhills Road. In particular, the provision of all private amenity space on the rear elevation poses a potential conflict and raises issues of how the privacy of future residents could be maintained. The applicant is requested to consider this and revise the scheme as necessary.
  - e) The masterplan submitted only relates to the existing commercial strip along Ballymount Road Lower, suggesting that neighbouring units could be developed in a similar piecemeal fashion, with parking courts to the front creating multiple accesses onto Ballymount Road Lower, extending the full depth of sites and providing no public open space. This masterplan is considered inadequate insofar as it does not consider the potential to incorporate development along Greenhills Road, and how development along Ballymount Road Lower must protect the development potential of the lands to the south. Redevelopment proposals should enhance the current situation. The applicant may wish to consider further site assembly or work with other neighbouring properties to develop a more robust masterplan that could be implemented and would meet the requirements of the development plan. In doing so, the applicant may wish to consider locating car parking to the rear of the building and develop lands along both Ballymount Road Lower and Greenhills Road in tandem.
  - f) It is not considered that the applicant has met the minimum storage requirements for all units. Hot presses and wardrobe areas cannot be counted towards storage calculations. The applicant is requested to submit revised proposals ensuring all units meet, or exceed, the requirements as per the Design Standards for New Apartments (2020).
  - g) Bicycle parking to the rear does not appear to be covered and it is not clear how these spaces could be reserved for the sole use of the apartments. Revised proposals are requested showing covered and secure bicycle parking to serve the apartment units only.

3. The applicant has not provided sufficient information in relation to the retail uses. A letter from the applicant clarifying certain elements is mentioned in the application pack, however does not appear to have been submitted. There is a concern regarding the occupiers of the retail units, the vehicular and pedestrian traffic that this might create, and the suitability of the access to these units, through the proposed private parking area serving the residential element of the scheme. The location of bicycle parking also impacts the potential permeability of the area, as other sites are developed in a similar manner. The applicant is requested to provide greater detail on the anticipated uses of the commercial units and how their access can be guaranteed whilst also ensuring the security of parking for the residential element of the proposal.
4. This application has still not sufficiently addressed access to the site via, what is noted as, a third party lane way to the east. No wayleave is indicated on the site location map and the Planning Authority therefore cannot be satisfied that access will be guaranteed to the rear of the site long term. The applicant is requested to provide greater detail in relation to all proposals requiring use of this laneway, indicating if any wayleaves are in effect and how ongoing access can be ensured.
5. Open Space
  - a. The applicant is not providing any open space as part of this scheme, nor do they indicate that open space could be provided as part of future development along Ballymount Road Lower. Table 8.2 of the Development Plan requires all new residential development on such lands to provide 10% public open space. The applicant is requested to consider how this can be achieved at the site, noting that, while there are open spaces nearby the development, access is across several large roads and junctions and would not be considered optimum, especially for families.
  - b. The communal open space would be located on the fifth storey, facing north. The Daylight and Sunlight assessment provided by the applicant concludes that this space will not achieve the recommended hours of sunlight. Without providing public open space, and with regard to this substandard communal open space provision, there would be concerns about the level of amenity being provided for future residents. The applicant is requested to consider how communal open space provision at the site can be improved, ensuring all relevant standards are adhered to.
6. Roads and Access
  - a. The applicant is requested to submit accurate plans demonstrating the provision of a visibility splay of 2.4m x 45m in both directions from the entrance. Sightlines should be shown to the near side edge of the road to the right hand side of entrance and to the centreline of the road to the left hand side of the entrance (when exiting).
  - b. The applicant is requested to submit a revised layout of not less than 1:200 scale showing the location car parking spaces to be provided at the development. Please refer to the SDCC County Development Plan 2023-2028. Any details of the expected nature of the retail units should be submitted in the context of assessing parking provision.
  - c. The applicant is requested to submit a revised layout of not less than 1:200 scale showing the boundary walls/bollards and gates at vehicle access points, these shall be limited to a maximum height of 0.9m, and any boundary pillars shall be limited to a maximum height of 1.2m, access widths shall be limited to 3.5m, in order to improve forward visibility for vehicles. The methods to prevent non residents from parking at the development.
  - d. A swept path analysis (i.e. Autotrack) confirming that larger vehicles such as refuse trucks/fire engines will have sufficient access to the site.

## 7. Landscape Design Proposals

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

- i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
- ii. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
- iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.
- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site
- v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

## 8. Roof Garden

Details regarding the provision of the roof garden and green roof within the development to be submitted and agreed in writing with the Planning Authority. The roof garden and green roof proposed shall be designed so that they contribute to:

- i. SUDS,
- ii. the creation of appropriate and biodiversity

The details to be submitted shall comprise:

- a. identification of the roof areas to be used for the provision of the roof garden and green roof;
- b. details of the planting to be used; and
- c. details of the maintenance including irrigation.

## 9. Boundary Treatment

The applicant is requested to submit elevation drawings specifying the proposed boundary treatment to the front of the site.

## 10. Sustainable Drainage Systems

- A. The applicant should demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 - 2028 in relation to sustainable drainage systems.
- B. In relation to SUDs, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates and showing what SuDS (Sustainable Drainage Systems) are proposed.
- C. SUDs Management - The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing

surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.

D. Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

E. The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m<sup>3</sup>. Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m<sup>2</sup> are proposed such as, green roofs, permeable paving, buildings, roads and their respective run off coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

#### 11. Green Infrastructure and Green Space Factor (GSF)

The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 - 2028:

a. To demonstrate how they intend to reduce fragmentation of existing green infrastructure. The applicant should provide a green infrastructure plan showing connections through the site and connections to wider GI network.

b. To demonstrate how the appropriate Greening Factor will be achieved for the relevant land use zoning objective. See link to the Green Space Factor Worksheet: Related Documents - SDCC

#### 12. Irish Water

The applicant is required to submit a drawing and report showing the proposed wastewater and the proposed watermain layout for the development.

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

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

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

Signed on behalf of South Dublin County Council

**Register Reference:** SD22A/0406

**Date:** 16-Dec-2022

Yours faithfully,

*Pamela Hughes*  
for **Senior Planner**