

## Michelle Dodrill

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**From:** Planning - Registry  
**Subject:** FW: 21019 Limekiln - Reg Ref SD22A/0386

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**Cc:** Planning - Registry <pregistry@SDUBLINCOCO.ie>  
**Subject:** RE: 21019 Limekiln - Reg Ref SD22A/0386

Good Morning Ian,

Thank you for your email.

Water services have looked at this application.

There is a 300mm surface water sewer passing through the site where house is proposed. Water service do not recommend diverting same to allow proposed house to be developed.

**Water services recommend that proposed development be refused** because it would be prejudicial to public health and proper planning.

Yours sincerely.

Brian Harkin  
Senior Executive Engineer  
Environment, Water and Climate Change  
South Dublin County Council  
County Hall, Tallaght, Dublin 24 D24 YNN5

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**Subject:** RE: 21019 Limekiln - Reg Ref SD22A/0386

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Good Afternoon Brian,

Following the below email and our subsequent telephone conversation, we wish to note the following in relation to Planning Reg Ref SD22A/0386.

- Permission was previously granted by SDCC with no objection from the Water Services Department for the diversion of the public surface water drain and the construction of a single dwelling on this same site, planning ref. SD07A/0710. Compliance drainage drawings in relation to the diversion of the surface water drain were submitted to SDCC on foot of a grant of permission and this was agreed with SDCC Water Services Dept.
- The revised planning application ref. SD22A/0386 involving a similar design scheme including the diversion of the existing surface water sewer on the site was prepared following consultation with SDCC Water Services on 22 April 2021, whereby SDCC confirmed in writing that an application could be considered in relation to the proposed

diversion of the pipe and SDCC Water Services provided advice on the required wayleave distances and the laying / direction of the new pipework.

- We understand that the planning authority appear to be supportive of the development and have requested that we consult directly with the Water Services Dept. to agree a drainage design and to facilitate the development of the single dwelling on the site. The site has the ability to accommodate both a single dwelling and the surface water pipe, including a 6.3m wide wayleave, once diverted. The client wishes to note that there is no legal wayleave on the site at present. By diverting the pipe, the client is willing to agree a 6.3m wide wayleave with SDCC.

- The proposed drainage design incorporating the diversion of the surface water sewer with an very minor change in direction does not diminish or negatively affect the capacity of the proposed relocated surface water drain as detailed in Downes Associates' engineering report.

- We are not aware of any amendment to the GDSDS with respect to the diversion of public sewers since the previous planning application was granted permission, hence the drainage principles as previously proposed and permitted have not changed. Ultimately, we are being asked to provide a technical rationale for this to our client so that a technical response can be provided to the request for Additional Information. You might please confirm. Ultimately if this diversion was acceptable to SDCC under reg ref SD07A/0710 then what has changed in the interim?

- The diversion of the surface water sewer will provide an improved performance including the installation of a non-return valve at the outfall and will be fully compliant with the requirements of the GDSDS. All works will be carried out by or under the supervision of SDCC at the applicant's expense.

- The client wishes to note that in addition to planning permission ref. SD07A/0710, additional precedence for the diversion of a public surface water drain on private land to facilitate the construction of a single dwelling is evident, notably planning application ref. SD20A/0190 at 124 Templeville Drive, Dublin 6W, which involved the diversion of an existing 450mm diameter surface water drain within a rear garden to allow for the development of a new single dwelling on the site. This application was refused on the grounds of the impact of the quality of amenity space for the existing and proposed dwelling, visual impact and traffic safety, however there was no objection by SDCC Water Services to the proposed diversion of the public surface water drain on the site and as such the diversion of the public drain did not form part of the reason of refusal. Another planning application approved by Dublin City Council ref. WEB1168/10 at 1 Abercorn Terrace, Dublin 8, involved the diversion of a 300mm diameter public surface water sewer on a private corner site to enable the construction of a proposed single dwelling. This was granted permission with no objection from DCC Water Services to the proposed diversion of the public surface water sewer which involved 2no. changes in direction of the pipework, one of which comprised a 90 degree bend. It is clear that there is a precedent for diversion of public surface water drains to facilitate the development of single dwelling units. Furthermore, the principle of diverting the pipe and the associated drainage requirements whether it is for a single dwelling or larger residential development does not change.

- The client wishes to note that there is no wayleave agreement in favour of SDCC currently in place with respect to the public surface water drain which traverses through the site in private ownership. The diversion of the public surface water sewer will allow for a wayleave agreement to be put in place with SDCC upon completion of the works.

- We ask SDCC Water Services Department to engage with us so that we may respond to the additional information accordingly from an engineering/technical perspective.

Best Regards,

**Ian Connolly**

B.E., CEng., Dip Struct Eng, Cert Eng, MIEI., MIStructE.  
Chartered Engineer

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**Subject:** 21019 Limekiln - Reg Ref SD22A/0386

Good Morning Gents,

We received a request for Additional Information on Planning Reg Ref SD22A/0386. Our comments on the relevant items are included below. We would be grateful if you could please clarify so that we may respond to the request accordingly.

1. The Water Services Department have serious concerns with regards to the 300mm surface sewer passing through the site where the dwelling is proposed. Water services consider the development would be prejudicial to public health and proper planning of the area.  
(i) The applicant is requested to consult directly with the Water Services Department at South Dublin County Council regarding a revised drainage design that enables the site's development to co-exist with the existing 300mm surface water sewer prior to the lodgement of an Additional Information response.

**Downes Associates Comment:**

We are happy to liaise with SDCC Water Services Department as always. You may recall that we discussed this in principle, as per the attached email, prior to lodgement of the application. The proposal involves a simple diversion as indicated on the civil engineering report and drawings included with the application. We also note that this same diversion was granted permission previously under Planning Reg Ref SD07/0710. We are unsure why there are serious concerns with regard to the 300mm sewer which passes through the site. Perhaps you can clarify so that we may respond to the request for additional information. The proposed works include a new non-return valve and proper outfall which is considered an improvement on the existing situation which we assume would be welcomed.

**Once agreed with South Dublin County Councils Surface Water Drainage Department:**

- (ii) Submit an approved drawing showing the surface water layout and attenuation for the proposed development.

**Downes Associates Comment:**

Our drawings and current report include a full stormwater modelling analysis including attenuation design calculations. A number of SuDS features are also proposed including a green roof, permeable paving, a water butt and stormwater attenuation which we trust is acceptable. Perhaps you can clarify what the requirement is here.

2. Having regard to location of the site in Flood Zone B, a site-specific flood risk assessment by a suitably qualified expert is required that accords with the Planning System and Flood Management Guidelines for Planning Authorities to enable the Planning Authority to fully consider proposals.

**Downes Associates Comment:**

A site specific flood risk assessment was prepared by Punch Consulting Engineers and was included with the planning application. Attached for reference.

Best Regards,

**Ian Connolly**

B.E., CEng., Dip Struct Eng, Cert Eng, MIEI., MStructE.  
Chartered Engineer

