



# Further Information Response Report

**Proposed Age Friendly Scheme Tay Lane,  
Rathcoole, Dublin 24**

On behalf of  
**Riverside Projects Limited**

December 2022



## Document Review and Approval

### Revision history

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## 1.0 Introduction

KPMG Future Analytics (KPMG FA) of 1 Stokes Place, St. Stephen's Green, Dublin 2 act on behalf of Riverside Projects Limited in respect of the proposed age friendly housing scheme located at Tay Lane, Rathcoole, Dublin 24.

On 17th October 2022, the Planning Department of South Dublin County Council (SDCC) issued a Request for Further Information (RFI) in relation to the proposed development. This RFI comprised of 16 no. items.

This Report and materials included in the response pack – prepared by PAC Studio, CORA, Martin Rogers, Bruton Consulting Engineers Ltd, Gannon and Associates, Studio4Design and JV Tierney form the basis of the response to the RFI. Importantly, this report should be read in conjunction with these other materials. The enclosed covering letter provides a comprehensive schedule of RFI materials.

### 1.1 Changes to the Proposed Development

In response to SDCC's RFI, a series of changes were made to the proposed development. These are principally comprised of:

1. Revisions to the red line boundary, thereby increasing the site area from 0.473 ha to 0.498 ha;
2. Revisions to internal layout of proposed apartment building, resulting in a reduction in units from 58 to 54 units and a reduced gross internal floor area (4,224 sq.m. to 4,082.8 sq.m.).
3. Removal of 4no. 1-bedroom units from the proposed development resulting in a revised residential mix comprising 16no. 1-bedroom units (30%) and 38no. 2-bedroom units (70%).
4. Revisions to the proposed site layout to provide 3 no. new public lighting columns on Tay Lane and pedestrian crossing facilities on Tay Lane and Eaton Drive.
5. Revisions to the proposed site layout, to increase the separation distance between the apartment building and the N7 by 3m and to relocate the proposed bike store to the rear of the Site.
6. Revisions to proposed landscaping scheme to provide an enlarged area of public open space with outdoor seating adjacent to the main site entrance on Tay Lane (350 sq.m); increased retention of existing tree line along the northern site boundary (3.5m buffer); increased height of fencing along the northern site boundary (3.2m); and uncovering existing culverted watercourse running alongside the western site boundary.
7. Revisions to proposed site access. Relocation of main site entrance and pedestrian crossing further south on Tay Lane and provision of pedestrian crossing within the car park within the Site.
8. Revisions to the northern elevation to remove all windows and balconies.
9. Revisions to the eastern and western elevations to provide glazed screening along the side of balconies closest to the N7 road.

The redlined Site area has been extended from 0.473 ha to 0.498 ha to include lands within SDCC's ownership to facilitate associated infrastructural works – including public lighting upgrades on Tay Lane and new pedestrian crossing facilities on Tay Lane and Eaton Drive. A Letter of Consent has been obtained from SDCC in respect of the works shown in the public highway and is enclosed with this pack. The net developable area of the Site which comprises the lands within the Applicant's ownership measures 0.473 ha. The enclosed Design Statement Addendum provides details of all changes to the design of the Proposed Development.

The result of these changes means that the statutory description of the development has been amended to the following:

*“The construction of a four-storey apartment block (4,082.8 sq.m) consisting of 54no. age-friendly residential units comprising 16no. 1-bedroom units and 38no. 2-bedroom units with associated private balconies, associated lift and stair cores, entrance lobby, and circulation space. The proposed development will also include the provision of a community facility (91.9 sq.m) and ancillary accommodation including refuse store (26.9 sq.m), cycle store (52.6 sq.m), plant room (46.2 sq.m), sub-station (14 sq.m), switch room (16 sq.m), landscaped public open space (1,191 sq.m) and communal open space (1,028 sq.m), and 30no. car parking spaces and 80no. cycle parking spaces to serve the development. Vehicular access to the development will be provided via an upgraded entrance from Tay Lane with a minor pedestrian access provided from Eaton Drive to facilitate direct linkages to the town centre. Planning permission is also sought for all ancillary site and development works above and below ground to facilitate the development including the provision of internal access roads and pedestrian cycle pathways and linkages, boundary treatment, public lighting, hard and soft landscaping, services, rooftop PV panels and associated signage.”*

## **1.2 Significant Further Information**

The Applicant has published the required notices indicating that the response is considered to represent ‘significant further information’. The newspaper notice was published on 20<sup>th</sup> December 2022 and the site notices were erected on 20<sup>th</sup> December 2022.

The enclosed drawings and public notices have been prepared in accordance with the requirements of the Planning and Development Regulations 2001, as amended (‘the Regulations’).

## 2.0 Item 1: Occupancy Restriction and Unit Mix

RFI Item 1 stated and sought the following:

*“(a) The proposal as presented provides no restriction on the class of occupant that can use the development. As noted elsewhere in the Planner’s Report, the proposed unit mix (65% 2-bed, 3-person units and no 3-bed units) would be contrary to national guidance and the County Development Plan and would only be acceptable to the Planning Authority if occupancy were restricted, to ensure its use for the stated purpose of development. Sections 39 (2) and 47 of the Planning and Development Act 2000 as amended, provide for agreements for the restriction of use of developments to a certain class of occupant. The development should be restricted to older persons as primary occupants. The applicant is invited to propose the wording of a condition of permission that might effect such a restriction, in order to support the provision of housing for older people.*

*“(b) The applicant may otherwise provide a rationale for the proposed unit mix in the context of council policy to achieve more than 30% of 3-bed units and national guidance to provide no more than 10% 2-bed / 3-person units.”*

### 2.1 RFI Item 1(a) Response

The Proposed Development has been designed in consultation with Approved Housing Body Clúid and is intended to be operated by Clann Housing which is Clúid’s dedicated age-friendly housing service. The development will be operated and managed under single ownership by Clann Housing and units will be allocated to households on the local authorities’ housing list thereby ensuring that the units are allocated to those households most in need. The enclosed ‘Age Friendly Design Considerations’ Report prepared by Studio4Design shows how the design of the Proposed Development has been strongly informed by the design of precedent age-friendly housing schemes also operated by Clann Housing.

In order to ensure that the development is maintained for the provision of age friendly accommodation in perpetuity in accordance with FI item 1(a) and to provide the Planning Authority with a sufficient degree of comfort and control regarding future occupancy, we propose the following condition:

*“The permitted development shall be operated only as an age friendly housing scheme. No separate sales or equivalent disposal of any individual residential units shall take place. The residential development shall be owned and operated by a single institutional entity except where otherwise agreed in writing by the Local Authority”.*

It is considered that the proposed condition is sufficient to ensure that the Proposed Development is maintained for the provision of age friendly accommodation only. Unlike a blanket age restriction, the proposed condition would not preclude residents on the local authorities housing list who may have reduced mobility due to illness but be under the age of 55 from the opportunity to move to a unit which better meets their health and mobility needs.

### 2.2 RFI Item 1(b) Response

The Applicant agrees to the imposition of a suitably worded condition to ensure that the Proposed Development is maintained for the provision of age friendly accommodation only. It is therefore submitted that there is no requirement to provide further justification for the proposed residential unit mix as amended at FI stage which comprises 16 no. 1-bedroom units (30%) and 38no. 2-bedroom units (70%).

## 3.0 Item 2: Unit Floor Plans

RFI Item 2 stated and sought the following:

*"The applicant's Design Statement does contain 'typical apartment layout' drawings for a 1-bed unit and a 2-bed / 3-person unit. These do not appear to adhere to the proposed units, nor do they do not show how the units are universally accessible, or how layouts could be revised as part of 'ageing in place' adaptations. The applicant should provide detailed unit layout plans by way of additional information, and these should highlight and show that the units are appropriately accessible and show how 'ageing in place' measures such as adaptations of bathrooms can be realised."*

### 3.1 RFI Item 2 Response

The enclosed Addendum Design Statement by PAC Studio provides detailed floorplan layouts which show the proposed layout of each apartment unit (refer to Section 3.1) and detailed dimensioned unit layout plans are provided for each unit type (3 no.) (refer to Section 3.6). The Addendum Design Statement also details how the proposed apartment building complies with relevant 'Building for Everyone' design guidelines specifically relating to Car Parking, External Approach, Entrances, Horizontal Circulation, Vertical Circulation, Services and Sanitary Facilities (refer to Section 3.6). In addition, the Age Friendly Design Considerations' Report provides detailed floorplans for each typical apartment type illustrating that all kitchens, bathrooms and double bedrooms are wheelchair accessible (refer to p8-p9).

## 4.0 Item 3: Overdevelopment

RFI Item 3 stated and sought the following:

*"The applicant is requested to reduce the overall provision of units in the development in order to achieve a car parking ratio of 0.65 spaces per unit, without increasing car parking levels above that proposed."*

### 4.1 RFI Item 3 Response

It is recognised that SDCC have overdevelopment concerns stemming from the proposed car parking ratios. This concern has been addressed by reducing the number of residential units by 4no. units resulting in an increased parking ratio of 0.56.

We consider that the car parking ratio is appropriate given the nature of the proposed development and the targeted occupier profile, predominantly older couples and single persons of retirement age. This is enforced by the Applicant's acceptance of a planning condition to ensure that the Proposed Development is maintained for the provision of age friendly accommodation only.

As detailed above, the proposed development has been designed in consultation with Clúid which is intended operator of the scheme and has extensive experience in managing this type of accommodation. The proposed car parking ratio has been deemed appropriate by Clúid as being sufficient to meet the car parking demand for comparable age-friendly housing schemes. For example, the existing Broom Lodge age-friendly housing scheme in Cabra which is operated by Clann Housing was granted permission by Dublin City Council with a car parking ratio of 0.46 (PI. Ref. 3617/12).

It is respectfully submitted that the Authority's perceived concerns regarding overdevelopment have been satisfactorily addressed through the proposed design interventions under this RFI and that



increasing the parking ratio would be contrary to local, regional and national planning policy which collectively seek to reduce reliance on the private car in accessible locations such as the application site.

## 5.0 Item 4: Noise

RFI Item 4 stated and sought the following:

*“(a) The Noise Impact Statement provided by the applicant measures and provides mitigation solutions for internal noise levels within the development. The statement does not provide solutions for use of balconies or the communal open space. The proposed development lacks mitigation measures such as noise barriers, set back landscaping and / or buffer zones from the national road. Balconies, particularly at higher levels, would be significantly affected by the noise. The northern façade of the proposed development would be closer to the N7 road than any comparable development of 4 storeys in Rathcoole. The design could be improved with greater buffering, with use of berms topped by hedgerows and trees; or by orienting the building such that it creates a noise barrier, with balconies and open space located to the south, and an insensitive use such as car parking located to the north., such as in the Eaton Square development to the east; or with the use of ‘winter garden’ balconies. The site is constrained due to its size and irregular shape. Expansion into the site to the north and west, or otherwise provision of a smaller development, would facilitate some of the above options for mitigating noise. The applicant should respond to the above by way of additional information, and in particular show how the scheme would comply with Policy IE8 Objectives 4 and 7.”*

*“(b) The applicant should supplement their Noise Impact Assessment and resulting recommendations to take account of noise arising from aviation.”*

### 5.1 RFI Item 4(a) Response

The Noise Assessment Report submitted with the Planning Application sets out detailed design specifications to ensure that the Proposed Development will ensure an acceptable internal residential noise environment in line with best practice including the installation of 1.8m deep Timber Noise Deflection Fencing along the northern boundary of the Site.

In response to Item 4, a series of additional noise mitigation measures have been incorporated into the scheme to further reduce noise impacts from arising from the N7. These mitigation measures are shown on the revised landscaping plans, site layout plan and elevation drawings and are as follows:

- Revisions to northern elevations to remove all balconies and windows overlooking the N7.
- Revisions to eastern and western elevations to provide glazing to balconies closest to the N7.
- Increased retention of existing tree line along the northern site boundary to provide a 3.5m buffer to visual continued screening and noise mitigation to the N7.
- Increased height of noise deflecting fencing along the northern site boundary up to 3.2m.
- Revisions to the proposed site layout, resulting in an increased separation distance between the apartment building and the N7 of 3m.

### 5.2 RFI Item 4(b) Response

We understand that Item 4(b) is a direct response to a third-party submission which states that the Noise Assessment submitted with the application should have considered noise emissions from aircraft associated with Casement Aerodrome. There is however no policy requirement under the SDCC CDP

to provide aircraft noise mitigation measures in this location. Under Section 12.11.5 of the CDP it states that

*“For new development within the Weston noise contour, and for new development within the inner half of the current Casement noise contour (which was based on different criteria), adequate sound insulation (suitable to the type of development) will be required.”*

The Site is located on the outer edge of the Noise Significant Boundary for Casement Aerodrome as indicated on SDCC Development Plan Aviation Map (no.12) shown in figure 1 below. As such, we consider an aviation noise assessment is not required to inform noise mitigation measures under the CDP. Further, it should be also noted in this respect that the Department of Defence, in their submission on the current application did not raise any objections to the application.



Figure 1 SDCC Development Plan Aviation Map (no.12) with Subject Site Indicated

We also note that our interpretation of the CDP in this regard is consistent with previous decisions made by the Board and by SDCC on other multi-unit residential schemes situated in comparable locations on the outer edge of Casement Aerodrome Noise Contour in Rathcoole. In 2020, the Board granted planning permission for an SHD scheme comprising 204 dwellings on Stoney Hill Road, Rathcoole (PI. Ref. ABP-307698-20). An aviation noise impact assessment was not required as part of the application and we note that the Department of Defence, in their submissions, did not raise any objection to this scheme. In 2018, SDCC granted planning permission for a 69-unit residential scheme on Green Lane, Rathcoole (PI. Ref. SD17A/0356). Again, an aviation noise impact assessment was not required as part of the application and we note that the Department of Defence, in their submissions, did not raise any objection to this scheme.

## 6.0 Item 5: Roads

RFI Item 5 stated and sought the following:

## 6.1 RFI Item 5(a) Response

*“(a) a Traffic and Transport assessment of the nearby junctions, to confirm that the development will have no impact on the traffic flows on the Rathcoole main street.”*

The enclosed Traffic and Transport Assessment (TAA) prepared by Martin Rodgers Consulting Ltd assesses the impact of the Proposed Development on traffic flows and on the T-junction of Tay Lane and Main Street. The TAA results show the Proposed Development will have an insignificant impact on the local road network, increasing flows at the nearby critical priority junction (Tay Lane/Main Street) by a maximum of just less than 2%.

## 6.2 RFI Item 5(b) Response

*“(b) a stage 1 road safety audit, with particular focus on the pedestrian access to the west” and east of the development.*

The enclosed Road Safety Audit (RSA) prepared by Norman Bruton contains 4 no. recommendations to improve safety for all road users. Each of these recommendations have been incorporated into the design of the Proposed Development as revised as FI Stage and as shown on the revised architectural drawings as follows:

1. A pedestrian crossing facility with dropped kerbs and tactile paving is proposed on Tay Lane as shown on the revised architectural drawings.
2. The width of the internal footpath within the site has been increased from 1200mm to 1500mm to facilitate safe wheelchair access as shown on the revised architectural drawings.
3. Swept path drawings have been prepared demonstrating the development access can cater for the swept path of refuse and emergency vehicles as shown in the revised Landscape Design Rationale document (refer to vehicle route figure, p12).
4. A pedestrian crossing facility with dropped kerbs and tactile paving is proposed on Eaton Drive as shown on the revised architectural drawings.

## 6.3 RFI Item 5(c) Response

*“(c) a revised layout of not less than 1:200 scale, showing a dedicated 2.0m wide footpath on the east side of Tay Lane from the Rathcoole main street to the access of the proposed development.”*

It has been determined that the construction of 2.0m wide footpath on the east side of Tay Lane from the Rathcoole main street along to the access of the Site is not technically feasible.

The enclosed Design Statement Addendum illustrates why it would not be feasible to achieve a 2.0m wide footpath on the eastern side of Tay Lane (refer to Section 3.4). As it currently stands, there is an existing footpath in place on the western side of Tay Lane which measures approximately 1200mm wide along its length with a remaining 4.50m wide carriageway for vehicular traffic. The inclusion of a 2.0m wide footpath to the east side of Tay Lane would reduce the carriageway width to circa 2.50m which would be insufficient for vehicular traffic. The inclusion of a 2.0m wide footpath could be included within the site boundary of the proposed development however this could not be extended up to Rathcoole Main Street as this would involve works outside of the Applicant's site boundary in private ownership. However, the construction of a 2.0m wide footpath to the east of Tay Lane within the Applicant's ownership would involve constructing a footpath over the culverted stream which is proposed to be uncovered in direct response to RFI Item 9 below.

Given the existing site constraints, it is proposed to retain the existing road and footpath layout along Tay Lane. A pedestrian crossing is proposed from the existing footpath on the western side of Tay Lane to the entrance of the proposed development. A dished kerb and associated tactile paving will be provided at the pedestrian crossing to Tay Lane. An additional pedestrian access and pedestrian crossing facility is also proposed on Eaton Drive. This layout has been evaluated as part of the Road Safety Audit as prepared by Bruton Consulting Engineers and has been determined to be acceptable from a road safety perspective.

## 7.0 Item 6: Aspect

RFI Item 6 stated and sought the following:

*"The proposed development is considered by the Planning Authority to contain 22 no. double aspect units (Unit Nos. 3, 4, 10, 11, 14, 17, 18, 24, 25, 28, 31, 32, 35, 39, 40, 43, 54, 55, and 58), amounting to 38% of the proposed units. The applicant is requested to consider improving the design and layout in this respect to provide a higher proportion of double aspect units."*

### 7.1 RFI Item 6 Response

In response to Item 6, the proportion of dual aspect units achieved is 52% based on revised building layout at FI Stage (28 no. dual aspect units out of the 54no. units). Section of 3.5 of the Addendum Design Statement identifies each unit which is 'materially dual aspect', which has an outlook onto two different elevations.

The proportion of dual aspect units achieved is considered to comply with the National Apartment Guidelines (2020) state that 'it is an objective that there shall be a minimum of 50% dual aspect apartments' in locations 'Where there is a greater freedom in design terms, such as in larger apartment developments on greenfield or standalone brownfield regeneration sites where requirements like street frontage are less onerous'. In this respect it should be acknowledged that the Site represents a constrained and sensitive infill urban development opportunity being enclosed by existing built development on all sides and a National Road (N7) to the north.

## 8.0 Item 7: Universal & Accessible Design

RFI Item 7 stated and sought the following:

*"The applicant has not shown in their Design Statement or Planning Report, that the development would accord with the 'Building for Everyone' design guidelines produced by the National Disability Authority and referenced in the County Development Plan. It is considered appropriate that the applicant provide a statement of compliance with these guidelines as additional information."*

### 8.1 RFI Item 7 Response

The enclosed Addendum Design Statement by PAC Studio provides detailed floorplan layouts which show the proposed layout of each apartment unit (refer to Section 3.1) and detailed dimensioned unit layout plans are provided for each unit type (3 no.) (refer to Section 3.6). The Addendum Design Statement also details how the proposed apartment building complies with relevant 'Building for Everyone' design guidelines specifically relating to Car Parking, External Approach, Entrances, Horizontal Circulation, Vertical Circulation, Services and Sanitary Facilities (refer to Section 3.6).

In addition, the Age Friendly Design Considerations' Report provides detailed floorplans for each typical apartment type illustrating that all kitchens, bathrooms and double bedrooms are wheelchair accessible (refer to p8-p9).

## 9.0 Item 8: Daylight and Sunlight

RFI Item 8 stated and sought the following:

### 9.1 RFI Item 8(a) Response

*"(a) The report provided shows that a large proportion of the floor space within the proposed units would not obtain 2 hours of sunlight on 21st March. While it is not clear why 2 hours of sunlight has been assessed against rooms – this is a standard generally applied to open spaces – the plans do illustrate a weakness of the design, with many rooms having poor sunlight access for most of their floor space. The appropriate measures to assess the design by in this regard are 'No Sky Line' and 'Target Illuminance'. The applicant should provide a supplementary daylight and sunlight analysis assessing the habitable rooms of the development against these standards (contained in BS 209 and BS EN 17037:2021), as additional information."*

The enclosed Daylight and Sunlight Analysis Report assesses the performance of the scheme and the impact of the scheme on surrounding properties in line with BS 209 (3<sup>rd</sup> Edition) and BS EN 17037:2021), as additional information. Scheme performance has been assessed against the Illuminance Levels criteria in accordance with BS 209 under two scenarios - Scenario 1 without the permitted Glebe House redevelopment scheme and Scenario 2 – with the permitted Glebe House redevelopment scheme. The key findings of the scheme performance assessment of the proposed apartment units are summarised here:

- Scenario 1
  - 92.5% pass rate against the 100 lux Illuminance Level target. 4 no. rooms in the 54 apartments assessed do not meet the target 100 lux Illuminance Levels target (100 lux over 95% of room area). However, the shortfall against the 100 lux Illuminance Level target is minor at 6% or 11% in each unit.
  - 100% pass rate against the 300 lux Illuminance Level target (300 lux over 50% of the room area).
- Scenario 2
  - 87% pass rate against the 100 lux Illuminance Level target. 7 no. rooms in the 54 apartments assessed do not meet the target 100 lux Illuminance Levels target (100 lux over 95% of room area). However, the shortfall against the 100 lux Illuminance Level target is relatively minor at just 6%.
  - Only 1 no. of the rooms assessed does not meet the 300 lux Illuminance Level target (300 lux over 50% of the room area). However, again, the shortfall against the 300 lux Illuminance Level target is relatively minor at just 6%.

The BRE 209 Guide notes that the guide itself 'is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location'. It recognises that 'Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.' Therefore, if the situation arises where the targets identified within the Guide are not achieved, these should be highlighted and either justified in the

context of the development / site or where relevant and applicable, compensatory measure will be proposed. Further, section 6.7 of the National Apartment Guidelines states that:

*“Where an applicant cannot fully meet all of the requirements of the daylight provisions, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, which planning authorities should apply their discretion in accepting taking account of its assessment of specific.”*

In light of this, compensatory design measures were incorporated into the revised plans, including:

- Communal living space within the apartment building at first floor level providing alternative indoor amenity space.
- Community facility providing alternative indoor amenity space.
- External balconies looking out on to surrounding landscape garden area providing alternative outdoor amenity space.

As such, even under the worst-case scenario (Scenario 2), the proposed development provides acceptable levels of daylight to proposed residential units. The recorded shortfalls against target Illuminance Levels are minor and mitigation measures have been designed into the scheme to mitigate against these minor shortfalls.

The Report also contains a ‘no skyline’ assessment both for the proposed scheme and existing surrounding properties in in line with BS 209 (3rd Edition). This assessment finds that the proposed development will have very limited impact on the actual daylight levels and available views to sky for the adjacent existing residences on Eaton Drive; similarly, the existing residences on Eaton Drive will have no impact on the provision of good views to sky for the proposed apartments.

## 9.2 RFI Item 8(b) Response

*“(b) The supplementary analysis report should also take account of the permitted structures under SD17A/0036, in particular the building due east of the southern wing of the proposed development.”*

Refer to the response to Item 8b above which summarises the results of our assessment with the permitted Glebe House redevelopment scheme factored into the baseline (PI. Ref. SD17A/0036).

As can be seen from comparing the two sets of results, the permitted structures have a relatively minor impact overall on the daylighting performance of the Proposed Development. Furthermore, we consider that the Glebe House permission (SD17A/0036) will not be delivered as consented. The permission is due to expire in approximately 11 months (2nd November 2023) and substantial works have not been carried out to date nor have the compliance conditions been cleared according to SDCC’s online planning records. Since an Extension of Duration may only be granted by a local authority where substantial works have taken place under the terms of the Planning Act (as amended, 2000) we anticipate that the permission will expire on 2nd November 2023.

Notwithstanding the above, we have adopted a precautionary approach and consequently assessed the daylight performance of the scheme taking account of the adjacent permitted structures in the interests of providing a comprehensive response. However, we remain of the opinion that it is unrealistic to assume the development as approved will be delivered.

## 10.0 Item 9: Watercourse

RFI Item 9 stated and sought the following:

*"It is noted that a stream running up the west of the site has been culverted and diverted through an underground pipe. This stream is to be uncovered as part of permitted development SD17A/0036. It is council policy to uncover culverts as per Policy G13 Objective 4 of the County Development Plan, and section 12.4.3. The applicant is requested to revise their landscape and drainage plans in order to uncover this watercourse and integrate it into the landscape proposals."*

The Proposed Development as revised at FI Stage incorporates the reinstatement of the original watercourse along the western boundary of the site in response to FI Item 9. The existing culvert is to be removed over the full extent of the site, with an access bridge to be installed to facilitate vehicular and pedestrian access to the site. The extent of the reinstated watercourse is shown on engineering drawing 2127-C.001 (Rev P03). The reinstated watercourse is also shown on the revised landscape drawings.

## 11.0 Item 10: Public Open Space

RFI Item 10 stated and sought the following:

*"The proposed public open space consists of the pedestrian path and surrounding verges/spaces between the western and eastern pedestrian accesses, and around the southern wing of the proposed building. This is linear incidental space and does not fit the qualitative requirements of public open space under the County Development Plan. The applicant is requested to provide additional information specifying how 10% of the site area will be provided as Public Open Space to the qualitative standards as set out in the CDP and on top of the requirements for Communal Open Space."*

In response to item 10 revised landscape drawings have been submitted which show outdoor gym equipment and outdoor seating within the public open space area extending to 1,191 sq.m. The CDP states that all 'Public open space should have active and passive recreational value' (Section 6.7.2). It is submitted that the proposed open space area provides for both active and passive recreation. An east to west public pedestrian route has been incorporated into the design of the scheme to provide an attractive landscaped route into the town centre as an alternative to the trafficked route along Main Street. New outdoor gym equipment has been located alongside this route to enhance opportunities for active recreation and a new seating area is proposed adjacent to the Tay Lane entrance which has also been enhanced by opening the existing watercourse here. The Design Statement Addendum also sets out a detailed response to item 10 (see Section 3.10).

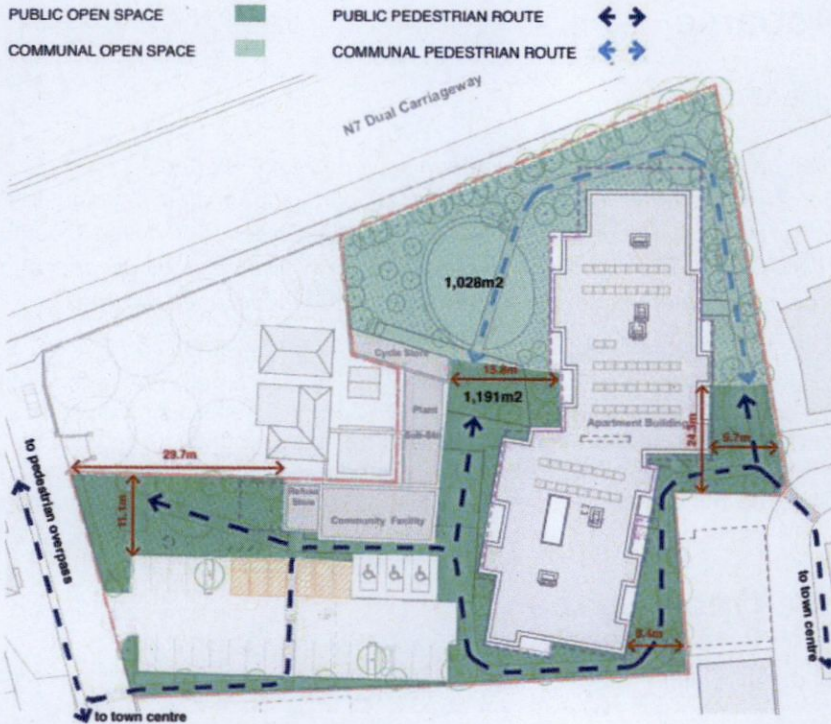


Figure 1 – Proposed Public and Communal Open Space

## 12.0 Item 11: Pedestrian Facilities

RFI Item 11 stated and sought the following:

### 12.1 RFI Item 11(a) Response

*“(a) The pedestrian access to the site from Tay Lane is located north of the car park. It is considered likely that pedestrians would simply walk through the car park. The car park should be reconfigured to make some provision along the south of the site for pedestrians, whether it is demarcated and raised footpath through the car park, or a footpath south of the parked cars.”*

In response to item 11a, revised architectural drawings have been submitted showing the main pedestrian entrance off Tay Lane located further south and a pedestrian crossing within the car park. The Design Statement Addendum Overview of Changes (refer to Section 2.1) identifies the revised pedestrian footpath layout as shown in Figure 2 (item 11) below.



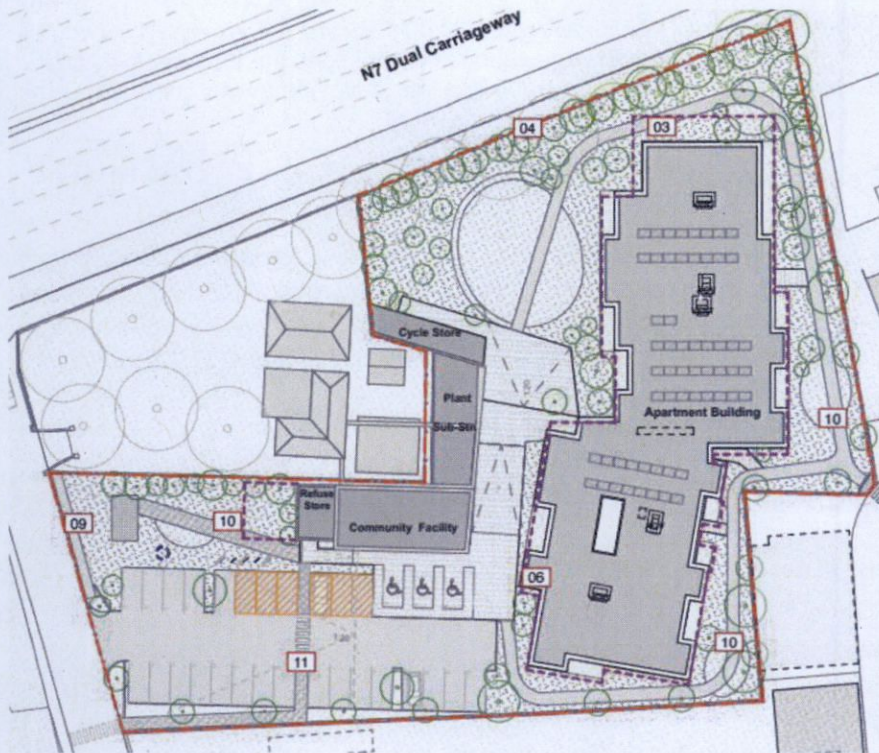


Figure 2 – Revised Site Layout including Revised Internal Pedestrian Footpath Layout (11)

## 12.2 RFI Item 11(b) Response

*“(b) The proposed east-west permeability through the site with a pedestrian access onto Eaton Green is encouraged and would contribute generally to a permeable village centre with good pedestrian links. The proposed pedestrian access to the east would open onto an area which may be in private ownership, and has not been taken in charge (though the street itself has been). The applicant should be encouraged to liaise with the Management Company or owner of the Eaton Development and report on progress towards consent for the opening at this location.”*

In response to item 11b, a pedestrian crossing facility including tactile paving and dropped kerb on Eaton Drive is shown on the revised architectural drawings. Construction of this crossing does not require consent from neighbouring private landowners however consent is required from SDCC as Eaton Drive has been adopted by the local authority. A Letter of Consent from SDCC is enclosed with this RFI response pack to facilitate the proposed crossing on Eaton Drive.

## 13.0 Item 12: Surface Water

RFI Item 12 stated and sought the following:

### 13.1 RFI Item 12(a) Response

*“The applicant is requested to submit:*

*(a) a drawing and report showing a flow route analysis of existing site. The development of the surface water flow routes throughout the site should correlate as closely as possible to the natural flow of surface water on site.”*

In response to Item 12a, the enclosed CORA drawing no. C.004 shows the existing flow routes diagrammatically. This drawing shows there are no large changes proposed to the topography, with the existing and proposed flow paths essentially retained allowing the development to correlate to the natural flow currently present on the Site.

### 13.2 RFI Item 12(b) Response

*“(b) a drawing showing all SuDS systems in plan and cross-sectional view. Show the treatment train and conveyance of surface water above ground over the site. Show the capacity in m3 of proposed SuDS systems. In exceptional circumstances underground attenuation systems are permitted but only if there is insufficient attenuation provided by SuDS (Sustainable Drainage Systems).”*

In support of this RFI Response site infiltration testing was carried out in November 2022. Following on from the completion of site infiltration testing, which revealed a soil infiltration rate of  $61.7 \times 10^{-6} \text{m/sec}$ , the surface water drainage has been updated as follows:

- Attenuation tank and surface water outfall from the site has been removed.
- Surface water soakaway implemented on site to cater for all roof areas.
- Permeable pavement build-ups adopted in all instances.

This revision to the design will result in all surface water falling on the site being intercepted and discharged to ground, with no requirement for off-site disposal of surface water. The design of the surface water soakaway has been carried out using the following design criteria:

- Impermeable Area: 1660m<sup>2</sup>
- Return Period: 30 years
- M5\_60: 19.8mm
- R: 0.266
- Allowance for Climate Change: 20%

Calculations in accordance with BRE365 confirm a soakaway storage volume of 82.80m<sup>3</sup> is required. It is proposed to construct the soakaway using Wavin Aquacells (or similar proprietary cell system) with a voids ratio of 0.95. We are proposing to install a 10m x 12m x 0.8m deep soakaway with a resultant storage volume of 91.20m<sup>3</sup> provided which exceeds the design requirement. The time for emptying to half volume has been calculated at 10 hours and 35minutes which is less than the 24hour requirement.

On this basis, we are satisfied that the proposed surface water soakaway is sufficient to cater for the rainfall generated by the development. The extent of the soakaway is demonstrated on CORA drawing no. C.001, and in section on CORA drawing no. C.002. The depth of the soakaway has been lowered to ensure that sufficient cover is provided to the Aquacell units which will be located under vehicular trafficked areas. Details of the proposed soakaway, along with the anticipated maintenance are included in the SUDS management plan referenced in (c) below. The SUDS management plan also includes details of the propose permeable pavement build-up and associated maintenance.

### 13.3 RFI Item 12(c) Response

*“(c) 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.”*

A comprehensive SUDS Management Plan has been prepared and is enclosed with this RFI Response pack. The report details the SUDS measures proposed, how the system will function following implementation along with a planned maintenance measures required to ensure adequate functioning of the system in service.

### **13.4 RFI Item 12(d) Response**

*“(d) a drawing and report which give greater detail regarding the attenuation capacity provided on site. Details required will include the proposed attenuation capacity provided by drainage features given in units of m3.”*

Further to Item 12b above, CORA drawing no. C.001 identifies that the proposed soakaway has a storage volume of 91.20m<sup>3</sup>.

## **14.0 Item 13: Public Lighting & Undergrounding of Services**

RFI Item 13 stated and sought the following:

*“The SDCC Public Lighting Department has recommended that additional public lighting is required in Tay Lane to ensure safety for pedestrians. The report states: The existing public lighting provision on St. Brigids-Tay Lane is insufficient and has been subject to many resident complaints in recent years, particularly by the Women’s Refuge. where there are often security concerns. The narrow footpaths and presence of ESB columns hosting distribution lines have limited the scope for improvement to the Public Lighting. The existing Public Lighting on St.Brigid’s- Tay Lane would be insufficient to provide adequate light to the increased pedestrian and vehicular traffic under the proposed development. Undergrounding of 2 spans of the ESN overhead distribution lines and the provision of a fully underground Public Lighting installation should be considered under this proposed development.”*

*The applicant should respond to the above by way of additional information”*

In response to item 13, an External Lighting Strategy prepared by JV Tierney is enclosed with this RFI Response pack. This details the revised proposed lighting strategy which includes a street lighting upgrade on Tay Lane. It is proposed for 3 no. new light fixtures and poles to be provided on Tay Lane in the locations shown on the revised lighting strategy drawing. The other 3 no. existing pole-mounted light fixtures on Tay Lane will be upgraded to a suitable high-efficiency LED streetlight.

The specification and proposed location of new lighting fixtures is detailed in the enclosed External Lighting Strategy which also details mitigation measures to minimise light spill. The exact location of the new fixtures and height of the poles will be confirmed following detailed design. The Electrical Consultant and Electrical Contractor on site will engage with the SDCC regarding these works. Power for all fixtures shall be provided from the existing source at which the existing lighting is currently fed from.

Having regard to the above, it is considered that the proposed public lighting strategy will satisfactorily illuminate Tay Lane to ensure safety for pedestrians whilst simultaneously safeguarding the residential amenities of present and future occupiers of the area.

## **15.0 Item 14: Taking in Charge**

RFI Item 14 stated and sought the following:

*"The applicant should clarify as to whether it is proposed to have any of the site taken in charge"*

It is confirmed that the proposed development will be managed by a single entity and that no additional lands within the red line site boundary are to be taken in charge by SDCC. The applicant actively sought to engage with the relevant parties in relation to public lighting but regrettably were unsuccessful in their attempts. As such, it is submitted that further details regarding the taking in charge of the proposed public lighting can be addressed and agreed in advance with the Planning Authority by way of a condition attached to a grant of permission.

## **16.0 Item 15: Public Realm – Landscape Plans**

*"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:"*

### **16.1 RFI Item 16(I) Response**

*"i. The applicant is requested to 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."*

A Landscape Design Rationale report was submitted at planning application stage and a revised (FI Stage) Landscape Design Rationale report is also enclosed which reflects the design of the proposed development as amended at FI Stage.

### **16.2 RFI Item 16(II) Response**

*"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."*

In response to Item 16(II), landscape drawing no. 21149\_LP\_SLP provides a detailed planting plan for the Proposed Development as revised. Further, Section 5.1 of the enclosed revised Landscape Design Rationale report sets out a detailed maintenance and management plan for the establishment and ongoing maintenance of the landscape elements of the proposed development.

### **16.3 RFI Item 16(III) Response**

*"iii. The landscape Plan should include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits."*

In response to Item 16(III), landscape drawing no. 21149\_LP\_SLP provides full details of all soft landscape details as revised and landscape drawing nos. 21149\_LP\_HLD and 21149\_LP together provide details of all hard landscape details.

### **16.4 RFI Item 16(IV) Response**

*“iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site.”*

The proposed site layout has been revised to provide for increased retention of the existing tree line along the northern and eastern site boundaries as detailed on landscape drawing no. 22149\_TS\_01. In total it is now proposed that 47no. trees will be retained and protected on-site, and 15 no. will need to be removed to facilitate the construction of the proposed apartment building. This is a significant reduction against the originally proposed number of trees identified for removal (42no).

## **16.5 RFI Item 16(V) Response**

*“v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development”*

In response to Item 12c a comprehensive SUDS Management Plan has been prepared and is enclosed with this RFI Response pack. Several SUDS measures have been incorporated into the scheme including a surface water soakaway system, use of permeable paving for hard landscaped areas (refer to landscape drawing nos. 21149\_LP\_HLD and 21149\_LP) and provision of the green spaces (refer to landscape drawing no. 21149\_LP\_SLP). The SUDS Management Plan report details the SUDS measures proposed, how the system will function following implementation along with a planned maintenance measures required to ensure adequate functioning of the system in service.

## **16.6 RFI Item 16 (VI) Response**

*“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.”*

In summary, the enclosed revised landscape drawings make provision for the following green infrastructure proposals:

- Soft landscaping proposals: include high biodiversity-value wildflower meadow planting and re-opening the existing culverted watercourse on-site (refer to landscape drawing no. 21149\_LP\_SLP0)
- Hard landscaping proposals: include permeable block paving as part of the SUDS strategy for the site (refer to landscape drawing nos. 21149\_LP\_HLD and 21149\_LP).

## **17.0 Item 16: Public Realm – Arboricultural Impact**

### **17.1 RFI Item 17(I) Response**

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

A detailed Tree & Hedgerow Survey, Assessment, Management, Mitigation & Protection Measures Report was submitted with the planning application which details the full results of the tree survey carried out on 15<sup>th</sup> November 2021 and details tree protection measures (refer to Section 9) in accordance with BS 5837: 2012 Trees.

In support of this RFI Response, a revised tree survey drawing (landscape drawing no. 22149\_TS\_01) has been submitted showing increased retention of the existing tree line along the northern and eastern site boundaries as detailed on landscape drawing no. 22149\_TS\_01. In total it is now proposed that 47no. trees will be retained and protected on-site, and 15 no. will need to be removed to facilitate the construction of the proposed apartment building. This is a significant reduction against the originally proposed number of trees identified for removal (42no.)

## 17.2 RFI Item 17(II) Response

*"ii. Survey of Existing Trees and Hedgerows - No equipment, machinery or materials are brought to the site for the purposes of the development, until a written statement detailing the retention and protection of trees on the site has been submitted to and approved in writing by the local planning authority. The submitted statement shall include a survey and assessment of all trees on the site and shall identify on a scaled drawing those trees to be retained and where arboricultural work is proposed. It shall also detail the measures and means of protecting the trees on the site in accordance with British Standards 5837:2005 (Trees in Relation to Construction). The development shall be carried out fully in accordance with the agreed details unless otherwise first agreed in writing with the local planning authority. If within five years from the completion of the development a tree which is agreed to be retained is removed, destroyed, dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, a replacement tree shall be planted within the site of such species and size, and shall be planted at such time, as specified in writing by the Public Realm Section."*

In response to Item 17(II), the enclosed revised tree survey drawing (landscape drawing no. 22149\_TS\_01) identifies the 47no. trees for retention and the 15no. trees for removal and provides details of tree protection measures for retained trees in accordance with BS 5837: 2012 Trees.

## 17.3 RFI Item 17(III) Response

*"iii. Retention of Identified Trees / Hedges - The trees and hedges identified for retention shall be protected during the course of the development. The trees shall be protected by the erection of temporary fencing in accordance with British Standard 5837:2005 (Trees in Relation to Construction), and the hedges shall be protected by a chestnut paling fence or similar fence to a height of not less than 1.8m and no closer than 1.5m from the hedge unless otherwise agreed in writing. The protective fencing shall be erected before the commencement of any clearing, demolition and building operations and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Within the fenced protection zone(s) no materials shall be stored, no rubbish dumped, no fires lit and no buildings erected inside the fence, nor shall any change in ground level be made within the fenced area unless otherwise first agreed in writing by the Public Realm Section."*

Further to Item 17(II) above, the enclosed revised tree survey drawing (landscape drawing no. 22149\_TS\_01) identifies the 47no. trees for retention and the 15no. trees for removal and provides details of tree protection measures for retained trees in accordance with BS 5837: 2012 Trees.

## 17.4 RFI Item 17(IV) Response

*"iv. Tree Protection: Drainage and Service Runs - No drainage or service runs (including cables, pipes or similar services) shall be laid beneath the canopy of any tree identified for retention nor within any fenced protection zone unless otherwise agreed in writing by the local planning authority."*

In response to Item 17(IV), it is submitted that this measure can be secured at detailed design stage by applying a similarly worded condition should permission be granted.

## 18.0 Concluding Remarks

The foregoing and enclosed response to the RFI has sought to thoroughly address each item raised by SDCC. Each of the items, and their sub-items where relevant, have been addressed in a robust fashion to illustrate the appropriateness of the Proposed Development.

Given the urgent need to provide suitable housing to meet the growing needs of our ageing population and the emphasis placed by policy at all levels on securing the regeneration of brownfield and infill sites we consider the Proposed Development to present a carefully considered opportunity to contribute to the sustainable and compact growth of Rathcoole town centre.

Consequently, it is respectfully requested that the Planning department of SDCC make a decision to grant planning for the proposed development.