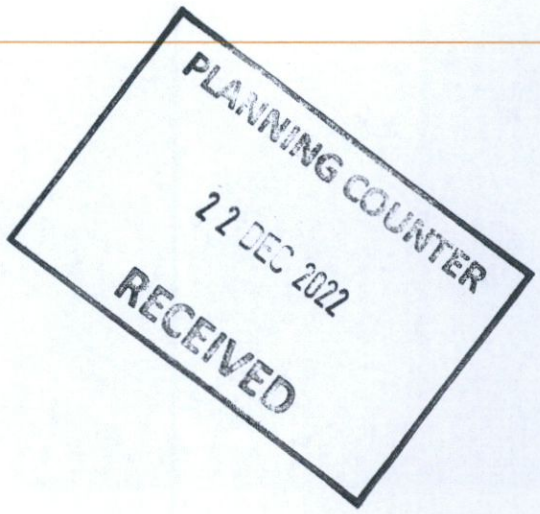
ARMSTRONG
FENTON
ASSOCIATES



20th December 2022.

Planning Department,
South Dublin County Council,
County Hall,
Town Centre,
Tallaght,
Dublin 24,
D24 A3XC.

RE:

Proposed amendments / change of house type to a permitted residential development known as "Ballycullen Gate", Oldcourt Road, Firhouse, Dublin 24.

ADDITIONAL INFORMATION

REF. SD22A/0356

Dear Sirs,

On behalf of our client Capami Ltd., we wish to respond to your letter dated 7th November 2022, requesting Additional Information in respect of the above proposed development, under Planning Ref. SD22A/0356 at Oldcourt, Dublin 24. Our response to same is set out below as follows:

Item 1:

The applicant has been requested to submit a drawing that overlays the proposed layout of the current proposed amendment over the landscape area (i) mid-slope and (ii) upper slope as identified in the Ballycullen-Oldcourt Local Area Plan (2014) (hereafter 'LAP'), which also illustrates the red line boundary of both the current application and the permitted development / parent permission i.e., the 64 no. dwellings at Ballycullen Gate. We have prepared the submitted drawing no. 2205-COHT-152 and both they and the following text set out the density of the proposed development and how we have calculated same.

We have referenced Fig. 4.6 "Land Use & Density Rationale" from the LAP in order to measure and calculate the density. Fig. 1 overleaf is an extract of same from the LAP. We spoke to the Forward Planning team in SDCC who confirmed that digital versions of this map were not available so we have used the image directly from the LAP, and therefore discretion must be applied.

permission on the subject lands and that the applicant has commenced construction of same. While this application will be assessed in its own right, it is put forward that it is disingenuous to assess it as a standalone development – it is essentially an amendment to an extant permission that will not fundamentally alter the scale, character, or layout of that permitted nor will it have any impacts on the receiving environment or the phasing arrangements of the LAP. The effect of the current application is to modify some of the permitted house types and to increase the overall number of dwellings on site by 7 no. units, thus resulting in a total of 71 no. dwellings in Ballycullen Gate, which therefore equates to a density of c.19 units per hectare.

We note that the required densities for the subject lands are shown in Table 5.4 of the Local Area Plan (page 30), as follows:

- Mid slope lands require 22-28 dwellings per ha (Net Average Density)
- Upper slope lands require 12 -18 dwellings per ha (New Average Density)

Objectives LUD 6 and LUD 7, contained in Appendix 1 "Plan Objectives" of the LAP, under "Land Use and Density Strategy" reiterate these densities. If an average of the above densities is considered, it equates to:

- Mid slope lands - an average of 25 units per hectare net
- Upper slope lands - an average of 15 units per hectare net

As the site straddles both density zones, an average density across both mid and upper slope lands equates to a density of 20 units per hectare. The permitted development of 64 units provides a density of 17 units per hectare. The proposed addition of 7 no. units results in an overall density of c.19 units per hectare at Ballycullen Gate which we contend generally reflects the permitted average density provided for in the LAP.

As requested, we have overlaid the proposed development (as outlined in red) over Fig. 4.6 of the LAP – refer to drawing no. 2205-COHT-152 "Proposed Site Layout Overlay with Diagram 4.6" submitted. A snapshot of same is as follows:

Fig. 2 – Current proposed development overlaid on Fig. 4.6 of the Ballycullen-Oldcourt LAP

Table 5.4 of the LAP sets out the "Required Densities" for the three distinct areas:

Landscape Area	Net Average Density per Ha.
Lower Slop Lands	32 - 38 dwellings
Mid Slope Lands	22 - 28 dwellings
Upper Slope Lands	12 - 18 dwellings

Based on the aforementioned, and within the red line of the original planning application, the only area discountable for net / gross areas is the part of the Main Link Street in the north-eastern part of the site that provides access to Ballycullen Gate. This occupies an area of c.3,443m² and is on the mid slope part of the site.

Mid Slope Lands

The portion of the overall Ballycullen Gate site that is located within the mid slope lands equates to 16,880m² (1.68Ha). In accordance with section 5.4.2 of the LAP, we have discounted part of the Main Link Street that forms part of the parent red line of application, and has an area of 3,443m² (0.3Ha), thus leaving a net developable area on the mid slope lands of 13,437m² (1.34Ha). The number of permitted units on the mid slope lands (under Ref. SD17A/0648) is c. 36 no. dwellings, which produces a net density of 27 units per hectare. This meets the required density for mid slope lands as per table 5.4 of the LAP.

The current proposal seeks to accommodate 38 no. dwellings on the mid slope lands, by adding 2 no. houses to this part of Ballycullen Gate. By applying the same method for calculating the resultant net density, the proposed development caters for 28 units per hectare, thus remaining in compliance with the required density for mid slope lands as per table 5.4 of the LAP.

Upper Slope Lands

The portion of the overall Ballycullen Gate site that is located within the upper slope lands equates to 21,097m² (2.1Ha). On the upper slope part of Ballycullen Gate, there are no areas that can be discounted for the purposes of calculating net density, as per section 5.4.2 of the LAP, as on this part of the site, there are no main and local Link Roads, primary school sites, local shopping facilities or large neighbourhood parks. The LAP requires that public open space shall be provided at a minimum rate of 30% on the Upper Slope Lands (Objective GI33), which has been adhered to as part of the extant permission and it serves the Ballycullen Gate development as opposed to being a neighbourhood park serving the wider community. The number of permitted units on the upper slope lands (under Ref. SD17A/0648) is c. 28 no. dwellings, which produces a density of 13 units per hectare which accords with the required density for mid slope lands as per table 5.4 of the LAP.

The current proposal seeks to accommodate 33 no. dwellings on the upper slope lands, by adding 5 no. houses to this part of Ballycullen Gate. Therefore, the proposed development of 33 no. units on a developable area of 2.1Ha, on the upper slope, produces a density of c.16 units per hectare, which remains compliant with the required density for upper slope lands as per table 5.4 of the LAP.

From the submitted drawings and the details set out above, it is evident that the proposed amendment, i.e. the addition of 7 no. dwellings to Ballycullen Gate remains compliant with the requirements of the LAP and should therefore be granted permission. The overall design and scale of residential at Ballycullen Gate, both permitted and proposed is reflective of the contextual location of the site.

A

- P190302-209 Section Profiles

2. In response to Item 2 (2), we submit drawing no. 2205-COHT-200 "Proposed taking in charge area drawing" prepared by Davey & Smith Architects which highlights area to be taken in charge for the proposed development at Ballycullen Gate.

Items 3 (a) & (b):

Pinnacle Consulting Engineers have prepared the submitted cover letter dealing with items 3 and 4 of this AI request – please refer to same. They also liaised with Mr. Brian Harkin (SEE – Water Services of SDCC) prior to submitting this formal response.

In essence, the comparison between the impervious area of the granted application, i.e. SD17A/0468 and the current application was to be confirmed, in order to determine whether the attenuation as provided under the aforementioned granted application, i.e. SD17A/0468, does in fact provide an adequate volume of attenuation storage, in order to also provide for the current application.

Please refer to the submitted Pinnacle drawing no. P190302-260 Rev. P01 titled "Impervious Area Scheme Comparison", which illustrates that the impervious area of the granted permission is circa 14,402m², whereas the impervious area of the current application is circa 14,625m², which generates an additional impervious area of circa 223m². The reason for the plan areas of the units being similar, is due to the fact that the previously permitted scheme consisted of detached units, which have now been converted to semi-detached with a different orientation.
Further to the above, Pinnacle Consulting Engineers assert that this slight increase in impermeable area is fairly negligible, however, if it is considered to be an issue by SDCC, we would propose that a type of rain garden, as illustrated in Appendix A of the submitted Pinnacle response letter, be implemented into the rear gardens of the additional 7 No. units, as indicated on the aforementioned drawing. These proposed rain gardens would accommodate a total run-off equating to circa 294m², based on half of the roof area of the unit draining to the rear and being collected by the rain garden. This measure would then counteract the slightly additional impervious area, as illustrated above.

It should also be noted that the surface water attenuation requirement and proposed infrastructure for the Ballycullen Gate development, as approved under Planning Reg. Ref. SD17A/0468 and complied with by way of a compliance submission, was lodged in April of this year under Condition 15 (a) & (b).

Please refer to the following submitted drawings prepared by Pinnacle Consulting Engineers for further details, as well as their enclosed cover letter:

- P190302-260 Rev. P01, titled "Impervious Area Scheme Comparison"
- P190302-250 Rev. P01, titled "Proposed Surface Water Drainage Layout – Sheet 1 of 2"
- P190302-251 Rev. P01, titled "Proposed Surface Water Drainage Layout – Sheet 2 of 2"

Item 4:

Please refer to the submitted cover letter from Pinnacle Consulting Engineers which confirms that as the permitted Ballycullen Gate development is currently under construction, a connection application was lodged with Irish Water in January of this year, Ref. No. CDS 2200048201 and the Self Lay Connection Agreement has since been issued out to the client by Irish Water, dated 30th November 2022, with a copy of same set out in the enclosed cover letter from Pinnacle Consulting Engineers - please refer to same.

lands, having already delivered almost c.350 dwellings, childcare facility, open spaces and a playing pitch to date in the environs.

This Additional Information response clearly demonstrates that the resultant density from the proposed amendments complies with the density targets for mid and upper slope lands as per the LAP, but also follows the guidance for calculating net and gross density in accordance with Appendix A of the 2009 Guidelines on Sustainable Residential Development in Urban Areas, and as also set out in the LAP.

The proposed amendment is not altering the permitted public open space provision and associated landscaping details as already permitted under Ref. SD17A/0468 and RMDA Landscape Architects have discussed same with the Parks Department of SDCC prior to submitting this AI response. Cognisance must be paid to the fact that the proposed development is a small amendment to the parent permission and that all landscaping details for the entire Ballycullen Gate development will continue to be agreed as the construction rolls out on site, including an appointed arborist to monitor the delivery of the development, notwithstanding all of the compliance details submitted to date under Ref. SD17A/0468.

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 the necessary details. 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

Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Managing Director,
Armstrong Fenton & Associates.

Enclosures

We enclose **6 no. copies** of the following drawings/documentation as part of this Additional Information response:

Prepared by Armstrong Fenton Associates:

Document No.	Title	Scale
N/A	Additional Information Response Report	A4 Document

Prepared by Davey + Smith Architects:

Drawing No.	Title	Scale
2205-COHT-151	Permitted Site Layout Overlay with Diagram 4.6	As Shown@A3
2205-COHT-152	Proposed Site Layout Overlay with Diagram 4.6	As Shown@A3
2205-COHT-153	Permitted Site Layout Density Areas	As Shown@A3
2205-COHT-154	Proposed Site Layout Density Areas	As Shown@A3
2205-COHT-200	Proposed Taking in Charge Area Drawing	As Shown@A3

(Enclosures Continued on Next Page)