



APPENDIX 2

LANDOWNER CONFIRMATION

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To Whom It May Concern:

27th February 2023.

Re : Pathway Homes Ltd.

Dear Sir/Madam,

We act for Pathway Homes Ltd. We can confirm that the site in question planning reference SD22A/0444 is owned in full by Pathway Homes Ltd.

If you have any further queries please do not hesitate to contact me.

Yours sincerely,



Dermot McDermott



DOCUMENT DETAILS

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1. INTRODUCTION

MKO have been instructed by our client, Pathway Homes Ltd, Dublin Road, Ballisodare, Sligo, Co. Sligo to submit an appeal to An Bord Pleanála in respect of a decision made by South Dublin County Council on the 30th January 2023, to refuse permission (Pl Ref. SD22A/0444) for a proposed residential development on lands at Knocklyon Road, Dublin 16. The description of the proposed development, as per the public notice, is as follows:

'The provision of 4 no. 5 bedroom 2.5 storey semi-detached houses and associated car parking; private open space, site landscaping, connection to existing services as well as the provision of vehicular access from Knocklyon Road and all associated site development works.'

Planning Permission was refused by South Dublin County Council on the 30th of January 2023 for the following reasons:

- 1. Notwithstanding the zoning objective of the application site, 'RES' which seeks to protect and improve residential amenity, the application site is subject to a Deed of Dedication of public open space. The intention of the Deed of Dedication is to commit this area to the public for use as public space and for the Council to utilise and maintain the land in the interest of the public. The subject land has a longstanding history of use as public open space and it is considered that the proposed development if permitted, would result in a loss of an existing high quality amenity space which would have a negative impact on the function, amenity, and connectivity of the wider residential area.*
- 2. The proposed development would materially contravene a condition attached to the planning permission for the existing Knocklyon Woods housing estate which identifies 5 no. areas within the development to be utilised as 'play space', one of which pertains to the subject lands. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*
- 3. The proposed residential accommodation is considered substandard in relation to private amenity space. The under-provision of usable and good quality private amenity space would suggest the proposal would be an overdevelopment of the site. In addition, insufficient information has been submitted in relation to the proposed vehicular accesses, to the satisfaction of SDCC's Roads Department. It is considered that proposed development would provide insufficient amenities to prospective occupants and is contrary to the proper planning and sustainable development of the area.*

A copy of the decision notice relating to South Dublin County Council's decision (Pl. Ref. SD22A/0444) is enclosed in Appendix 1 of this appeal submission. A cheque in the amount of €1,500 payable to An Bord Pleanála is also enclosed with this Grounds of Appeal submission. This Grounds of Appeal document will demonstrate that the proposed development is appropriate in the context of the principles of proper planning and sustainable development.

2. PROPOSED DEVELOPMENT

2.1 Site Location & Description

The subject site is located on the Knocklyon Road, Dublin 16 (Figure 1 below). The site is 0.0843ha in size. It is bounded to the north and east by existing residential development and to the west by the Knocklyon Road. The subject site is zoned 'Existing Res' as part of the current South Dublin County Council Development Plan 2022-2028.



Figure 1 - Subject Site at lands on Knocklyon Road

The zoning objective for lands zoned 'Existing Res' is 'to protect and/or improve residential amenity'. It is important to note that the provision of new residential development within this land use zoning is permitted in principle as per Table 12.2 South County Dublin Development Plan 2022 - 2028. The site is located on the eastern side of the Knocklyon Road and is currently an undeveloped greenfield site. The subject site is primarily flat and grassed with 2 no. trees to the western side of the site, a boundary wall to the south and scrub to the north and east creating a boundary line between the site and surrounding private residential garden space. The area is predominantly residential, with numerous recreational, educational, and sports facilities in the locality.

3. **PLANNING HISTORY**

3.1 **Applications on the Subject Site**

Table 1 below details the available planning history on the application site. The planning permission referred to in Table 1 below is the parent permission for the wider residential development. Table 2 below includes the details of the appeal of the grant of planning permission to An Bord Pleanála.

Table 1 - Original Application for Knocklyon Woods

Application	Received Date	Decision Date	Decision
Pl Ref. C2040 For permission for the erection of 485 dwelling houses on a site of 73-acres in extent fronting to Knocklyon Road.	18/12/1970	24/12/1971	Granted with 24 no. conditions

Table 2 - 3rd Party Appeal

Appeal	Received Date	Decision Date	Decision
Pl Ref. C2040 3 rd party appeal by the Butterfield District Residents' Association	Not Available	Not Available	Granted with 7 no. conditions

4. PLANNING POLICY CONTEXT

The following planning policy is considered pertinent in the context of this Grounds of Appeal submission.

4.1 National Policy

4.1.1 National Planning Framework

The Department of Housing, Planning, Community and Local Government recently published the National Planning Framework (NPF) entitled 'Ireland 2040' to succeed the NSS. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional, and local planning and investment decisions over the next 25 years. The NPF is a high-level document which provides a framework for future development and investment in Ireland, providing a long-term and place based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy, and communications, into an overall coherent strategy. The NPF has a number of direct National Policy Objectives (NPO) that articulate delivering on a compact urban growth programme. These include:

- **NPO 3a:** Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- **NPO 3b:** Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.
- **NPO 32:** To target the delivery of 550,000 additional households to 2040.
- **NPO 33:** Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- **NPO 35:** Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

The Vision of the NPF states the *target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites*. Compact growth is stated within the NPF as National Strategic Outcome 1. It is deemed vital by the NPF to prevent further urban sprawl and incorporate new housing into areas already well serviced by public transport, shops, educational facilities and employment opportunities. This can be achieved by the development of under-utilised land, or 'infill' sites. The development of these sites in a compact growth frame is considered to be an efficient form of residential development. According to the NPF the provision of well-designed and well-located higher density housing will assist:

- *Fast-growing urban areas to achieve much needed scale;*
- *Medium-sized urban areas to find a route to quality in a new competitive framework;*
- *All urban areas to increase vibrancy and vitality;*
- *Increased efficiency and sustainability in the use of energy and public infrastructure*

The Proposed Development is supported by the above objectives. NPO 3a, NPO 3b and NPO 35, from the NPF, promote the consolidated development of residential housing, and densification of the existing built-up footprint of Dublin City and connected suburbs. The subject site, under these objectives would contribute to the delivery of additional homes, thus supporting NPO 32.

4.1.2 Planning Policy Statement 2015

The Department of Environment, Community and Local Government's (DECLG) Planning Policy Statement 2015 encourages Planning Authorities to engage in active land management by leading and managing the development process and ensuring that land zoned for development actually comes into use in accordance with Development Plan policy and in tandem with supporting infrastructure.

The policy statement acknowledges that creating a consolidated urban form fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure. The guidelines reinforce the use of infill sites to enable sustainable compact urban growth.

4.2 Regional Policy

4.2.3 Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

The Eastern and Midland Regional Assembly adopted the Regional Spatial and Economic Strategy in 2019 (RSES). The RSES sets out a settlement hierarchy for the region and identifies key growth areas which will see significant development up to 2031 as well as population targets at the county level. A number of strategies and Regional Policy Objectives (RPO) establish compliance with the NPF and set out how the region will develop over this 12-year timeframe. The RSES presents the following RPO to promote the development of infill sites and delivery of compact urban growth:

- *RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects.*

The objectives and strategies in the NPF set parameters for the RSES, these include:

- *A focus on contained growth and reduced sprawl by targeting infill and brownfield lands in existing built-up areas.*

The RSES also includes Regional Strategic Outcomes (RSO), aimed to support, and achieve the vision for the region and contribute to the NPO and NPS. Similar to the RPO, the RSO also aim to achieve the compact urban growth through infill and under-utilised sites:

- *RSO 2 is the need to achieve ambitious targets for compact growth in our urban areas. Urban regeneration and infill sites can contribute to sustainable compact growth and revitalisation of existing settlements of all scales.*

The subject site is located within the contiguous built environment of the Dublin Metropolitan Area. The RSES also sets out the strategic planning and investment framework for the growth of the Dublin Metropolitan Area (MASP) which is an integrated land use and transportation strategy. Within the Dublin MASP compact growth is promoted as a form of sustainable development. This can be observed in **Section 5.3: Compact sustainable growth and accelerated housing delivery:**

- *To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.*

The Proposed Development is supported by RSO 4.3, in the RSES, and also will support the aims and objectives of the RSES with regard to the provision of housing within the built-up footprint, accelerated housing delivery, and compact sustainable growth (RSO 2).

4.3 Local Policy

4.3.4 South Dublin County Development Plan 2022-2028

The South Dublin County Development Plan 2022-2028 (SD CDP) instructs and provides the guidance for the proper planning and sustainable development of the administrative area. The Development Plan guides growth and expansion to provide the highest quality environment and standard of living to the area, with sustainability, healthy placemaking and a growing economy at the centre of the plan.

The settlement hierarchy of the area as set out in the SD CDP 2022-2028, in line with the RSES describes the site as being in the *international business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. [the area] acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment*¹. The SD CDP 2022-2028 Core Strategy also sets out guidelines to support the growing population and meet the demand for housing, while also maintaining the quality and character of the county.

The population projections are of overall importance for the county's healthcare, education and as mentioned already housing. Population growth targets from the RSES are provided using historical data and projections including residential developments and various other factors set to influence the population growth in the future. The estimates for South County Dublin set out growth scenarios and adjusted for 'Additional Headroom'. These population projections are detailed in national and regional level policy and by the local authorities for their respective Development Plans:

*"The RSES includes population figures for the Region, the parameters of which are set out under Appendix B of the EMRSES, which envisages South Dublin County to grow by an additional 50,233 persons from 2016 to 2031...For South Dublin County up to 2028, the targeted population growth is an additional 45,002 persons*²".

The NFP requires all local authority councils to provide a Housing Need Demand Assessment (HNDA), to get an overlook at the potential housing demand in each county in relation to the projected population and support the Housing Strategy. The HNDA is informed by the population growth projections to determine future housing needs, such as unit typology and stock requirements. The Interim HDNA included in the SDDP 2022-2028 provides family profiles for the South County Dublin population which shows families with Preschool, Early-school and Adolescent children at 47.15% is higher than the Eastern Region (46.1%) and the State (45.6%) with the retired family percentage (9.1%) below the Dublin (9.5%), EMRA (8.9%) and State figures (10%).

The following sets out the Housing Strategy and Interim HNDA Policy Objectives, relevant to the proposed development, which are incorporated into the Development Plan:

- **HS1: Objective 1:** To ensure adequate and appropriate land is zoned to facilitate and implement the aims of the Core Strategy, to deliver sustainable development, and to meet likely future housing need in the County as identified by the Housing Strategy and Interim HNDA.
- **HS1: Objective 9:** To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County's town boundaries, suited to

¹ South County Development Plan 2022-2028, Table 14, p. 66

² South County Development Plan 2022-2028, p. 35

their strategic regional role and subject to good design and development management standards begin met.

The following SD CDP policy strategy and objectives guide the Core Strategy framework towards sustainable development within the county:

- **CS6 Objective 2:** To promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs (consistent with NSO 1, RSO 2, NPO 3b and RPO 3.2).
- **Policy CS6: Settlement Strategy - Strategic Planning Principles:** Promote the consolidation and sustainable intensification of development within the urban settlements identified in the settlement hierarchy.
- **Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement:** Promote the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.
- **Policy H2: Supply of Housing:** Ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.
- **H2 Objective 3:** To promote and facilitate the development of infill schemes throughout the County where it has been identified that such schemes will contribute towards the enhancement of communities within the County, working towards an even spread of such schemes across all LEAs, whilst ensuring that sufficient and appropriate public spaces and amenities are preserved in existing residential estates, subject to the protection of residential amenity.
- **Policy H9: Private and Semi-Private Open Space:** Ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.
- **Policy H13: Residential Consolidation:** Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.

In summary, targets and objectives in the SDDP set out the need for compact urban growth to accommodate a population increase of 45,233 people up to 2031 with a requirement to provide 15,576 units in the plan period³. It should be noted also, that since the plan making period of the SDDP 2022-2028, preliminary data from census 2022 has become available. Preliminary results released by the Central Statistics Office indicate the population of the state has reached 5.1 million, an increase of 7.6% (or 361,671 persons) since 2016. The rate of population increase in the previous census interval (2011-2016) was 3.7% (or 169,724 persons).

The subject application proposes residential development which is in line with the key objectives set out at a National, Regional and Local scale through the delivery of housing in a sustainable and compact manner, in line with SDDP 2022-2027 HS1: Objective 9, Policy CS6, and Policy H13. The Proposed Development will also contribute to the delivery of Policy H2: Supply of Housing and HS1: Objective 1 by providing additional housing to the county. With regard to H2 Objective 3, in the following section will discuss the characteristics and qualities of the subject site that qualify it as an infill site and will demonstrate the sufficient and appropriate available public open space in the locality.

4.3.4.1 Land Use Zoning

The subject site is zoned 'Existing Res' under the current South Dublin County Council Development Plan 2022-2028, as per the SDCC Development Plan 2016-2022. It should be noted by the Board that the principle of providing new residential development on this land use zoning is permitted in principle.

³ South County Development Plan 2022-2028, Table 7, p. 43



Figure 2 - Land Use Zoning (Site Boundary Indicative Only)

4.4

Policy Conclusion

In the first instance it should be noted that the range of national, regional, and local planning policies outlined above are intended to facilitate the delivery of new residential development as provided for in the Government’s Housing for All strategy. In turn, the Housing for All strategy is intended to assist in delivering one of the core missions of the Programme for Government, which is to address the ongoing housing crisis. While the ongoing accommodation shortage should not facilitate development which would otherwise be unacceptable from a planning perspective, the suite of national policy and guidance that has issued from Government in recent years is intended to facilitate a new approach to how we deliver new housing in our towns and cities. It is important to emphasise that emerging residential development policy requires innovative solutions to the delivery of new housing including the consolidation of existing suburban areas and the utilisation of infill sites where possible.

The proposed development accords with National and Regional policy objectives for the provision of compact urban growth. The NPF sets out Compact Growth as a National Strategic Outcome 1, encouraging sustainable development within existing settlements to accommodate the growing population through controlled densification and consolidation. The principle of the provision of new residential development (as per Section 4.3.4.1 above) on the application site is acceptable in principle.

5. GROUNDS OF APPEAL

5.1 Response to Reasons for Refusal

This section of the Grounds of Appeal document addresses the matters raised by South Dublin County Council in their reasons for refusal. This section will demonstrate that the proposed development is appropriate in terms of the overall planning and sustainable development of the area and is consistent with national and local planning policies and objectives.

We would request that the Board note the following key points at the outset, as these are pertinent in the context of this Grounds of Appeal submission.

1. The applicant has full legal title in respect of the subject site (See Appendix 2).
2. In respect of the Deed of Dedication referred to in Refusal 1 below (Section 5.1.6) and in the South Dublin County Council Planner's Report (30th January 2023) - MKO have made several requests to South Dublin County Council to furnish a copy of this Deed. As of the date of this appeal submission, a copy of same has not been received. It should be noted that the applicant/landowner is not aware of the existence of a valid Deed of Dedication in respect of the subject lands.

We have examined the reasons for refusal and are of the view that the proposed development as presented is in accordance with the proper planning and sustainable development of the area. The grounds of appeal are set out below.

5.1.5 Refusal Reason No. 1

"Notwithstanding the zoning objective of the application site, 'RES' which seeks to protect and improve residential amenity, the application site is subject to a Deed of Dedication of public open space. The intention of the Deed of Dedication is to commit this area to the public for use as public space and for the Council to utilise and maintain the land in the interest of the public. The subject land has a longstanding history of use as public open space and it is considered that the proposed development if permitted, would result in a loss of an existing high quality amenity space which would have a negative impact on the function, amenity and connectivity of the wider residential area."

5.1.6 Response

MKO understand that South Dublin County Council (SDCC) accept that the principle of the proposed development is acceptable in the context of the land use zoning of the site i.e., the provision of new residential development on lands zoned 'Existing Res'. It should also be noted that the Planner's Report prepared by South Dublin County Council (Page 15) in respect of the proposed development, states the following:

'Given the location, scale and form of the proposed dwellings, it is not considered that the proposal would have an unacceptable overbearing, overlooking or overshadowing impacts on existing residential properties.'

Therefore, it should be noted by the Board, that the key issue in respect of Refusal Reason No.1 is the assertion by SDCC that the application site is the subject of a Deed of Dedication and has a longstanding use as public open space. On this basis, SDCC go on to conclude that, the proposed development would result in:

'the loss of an existing high quality amenity space which would have a negative impact on the function, amenity and connectivity of the wider residential area.'

The position set out by SDCC and as outlined above raises a series of matters which the Board will require to consider in the context of this appeal as follows:

- Are the lands which form the application site the subject of a Deed of Dedication?
- Do the lands have a longstanding history of use as public open space?
- Do the lands form a high-quality amenity space?
- Would the proposed development adversely impact the function, amenity and connectivity of the wider residential area?

The matters outlined above must be considered against the backdrop of the extensive national, regional and local planning policy context which seeks to unlock development lands across the built footprint of our towns and cities to deliver the consolidation and sustainable intensification of development. The reasons for facilitating this type of infill and consolidated residential development are many-fold but could broadly be summarised as being intended to deliver sustainable compact urban and suburban growth and to provide more flexibility in delivering solutions to the ongoing housing crisis.

The strategic planning policy background to new residential development in our towns and cities has fundamentally changed over the course of the past decade to move away from the unsustainable forms of development that had characterised our urban and suburban areas in the latter half of the 20th Century and early part of the 21st Century, for example, mono-use urban development and low-density suburban sprawl. The emerging suite of national and regional policy guidance that came into force in the latter half of the 2010's including the National Planning Framework, the Regional Spatial & Economic Strategies, the Design Standards for New Apartments, the Urban Development & Building Heights Guidelines etc are all intended to deliver the flexibility referred to above as well as the following:

- More compact and sustainable urban and suburban growth.
- Achieving the re-intensification of infill/brownfield

The emerging strategic planning policy context requires a reconsideration of where new residential development can be delivered other than on greenfield sites on the edges of our towns and cities. Opportunities for delivering new residential development on 'infill' sites, such as the application site, are an integral part of delivering the vision outlined in the National Planning Framework and the suite of national and regional planning policy and guidance. It is against this backdrop that the principle of the proposed development and the matters raised in Refusal Reason No.1 above must be considered.

5.1.6.1 Deed of Dedication

It is noted that the Planner's Report makes reference to a Deed of Dedication in respect of the subject lands. As outlined in Section 5.1 above, MKO have made a number of requests to SDCC in order to obtain a copy of this Deed but as of the date of this appeal, SDCC have not issued a copy of same. It should also be noted by the Board that the applicant/landowner is not aware of the existence of a valid deed of dedication in respect of the subject site.

In circumstances where the Deed of Dedication on Page 10 of the Planner's Report has not been circulated to the applicant for permission and has not been made available, it would be contrary to the principles of natural justice to place any presumptive weight on the reference to the Deed of Dedication. For example, in *State (Haverty) v An Bord Pleanála*,⁴ Murphy J. made the following comments within the context of an argument that a person making a detailed observation on a planning appeal should have been allowed to make a further observation by a way of a response to further submissions from an interested party:

⁴ [1987] I.R. 485.

“The essence of natural justice is that it requires the application of broad principles of common sense and fair play to a given set of circumstances in which a person is acting judicially. What will be required must vary with the circumstances of the case.”

In the event that the Board exercises its powers under s.131 of the PDA 2000 to seek evidence of the availability of the Deed of Dedication, the applicant reserves its rights to respond to any documents that might be provided by SDCC.

We would contend that the existence or otherwise of a deed of dedication does not preclude the development of the subject lands in principle. A development proposal should be considered on its specific merits and whether it would accord generally with the principles of proper planning and sustainable development. The question as to whether the development of the lands would have a negative impact on residential amenity arising from a loss of open space and the Deed of Dedication are intrinsically linked. It is considered that the fundamental question, from a planning perspective, is whether there is in fact a negative impact on existing residential function, amenity, and connectivity arising as a result of the proposed development and this is addressed in Section 5.1.6.3 below.

It is also submitted that the Deed of Dedication could not bind the planning authority, or the Board on appeal, in perpetuity as this would sterilise the applicant’s Constitutional property rights. In that regard we note that the site of the proposed development is largely zoned ‘RES’: ‘*To protect and/or improve residential amenity*’ under the South County Development Plan for the period from 2022 to 2028 and a strip of land along the south-eastern boundary is zoned ‘OS’: ‘*To preserve and provide for open space and recreational amenities*’.

We assume that the Development Plan was made and the zoning for the site in question was adopted by the elected members having regard to the existence of the Deed of Dedication. Therefore, insofar as there may have been a Deed of Dedication at some point (which is not accepted), it is clearly a secondary consideration to the actual zoning in the Development Plan. The provisions of a Development Plan are a relevant statutory consideration (see s.34(2) of the PDA 2000) and, in the recent case of Crofton Buildings Management CLG v An Bord Pleanála [2022] IEHC 704, the High Court confirmed (P79 of the judgment) that the default position is that it is the development plan in force at the time the decision is made that applies.

In the case of Hennessy v An Bord Pleanála [2018] IEHC 678, Murphy J. stated (P41 of the judgment) that that provision simply and expressly states that a grant of planning does not override a person’s existing common law rights.

In the event that the Board is satisfied that there is a valid Deed of Dedication in place in respect of this site, we would contend that the Board should still consider the planning merits of the proposed development and grant planning permission on the basis that any instrument purporting to dedicate land in trust for the public at large is a private law matter.

Finally, we would also refer the Board to Section 8.7.4 of the SDCC Development Plan which states that the Council may, in certain circumstances and at its sole discretion, allow for an element of open space to be located off-site where it exceeds the minimum on-site requirements. Alternatively, the Council may in certain circumstances and at its sole discretion, determine a financial contribution in lieu of all, or part of, the public open space requirement for a particular development.

COS5 OBJ 7 also states:

To require at the sole discretion of the Planning Authority a pro rata contribution in lieu of provision of public open space where, due to the small size, configuration or location of a particular development or on sites with less than three units it is not possible to provide functional public open space on site.

It is clear that there is an inherent discretion in the Development Plan where an open space requirement cannot be met and we would ask the Board to consider same if it concludes that the open space requirements in Tale 8.2 of the Development Plan are not met with the proposed development.

5.1.6.2 History of the Lands

On behalf of the appellant and based on precedents within South Dublin County Council's own functional area, we would question whether the historic use of the site would preclude on principle the provision of a residential development thereon. We refer the Board to 2 no. Part 8 decisions made by SDCC in recent years:

- Ref: SD-C191 – Proposed Development of a Social Housing Project for Independent Living for Older Persons consisting of 10 no. units on undeveloped lands at Pearse Brothers Park, Rathfarnham, Dublin 16
- Ref: SD-C126 - Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 12 no. units and demolition of single storey dwelling house on undeveloped lands off Old Bawn Road & Old Bawn Way, Tallaght, Dublin 24

MKO understand that both of these Part 8 planning applications were granted planning permission. A review of the submissions on both of these planning applications indicates that they were both the subject of significant local opposition. The content of the submissions indicates that both sites, at the time the planning applications were made, were and had been in use by local residents as recreational and amenity space for a considerable period of time. The submissions include written and photographic evidence to this effect. MKO do not purport to be familiar with either the historic use of either Part 8 site of their use at the time the planning applications were made. However, the evidence provided within the submissions would appear to indicate that these lands may well have had a longstanding history of use as public open space. Notwithstanding this, SDCC granted planning permission for the provision of residential development on the sites in question.

We would request that the Board consider how the history of the use of lands as open space is identified as a basis for refusal of permission in the subject case, yet SDCC granted planning permission to themselves for residential developments on lands that would appear to share the exact same characteristics.

5.1.6.3 Quality of Open Space & Amenity, Function & Connectivity Impacts

5.1.6.3.1 Quantum of Open Space

The Planner's Report prepared in respect of the subject planning decision states that the residential amenity requirement for the existing residential development (i.e. as permitted in 1971 – Ref: Pl Ref. C2040) was to provide 3.71 acres of public open space which includes the local amenity park and 5 no. play spaces plus a financial contribution toward the provision of playing fields in the area proposed as the Dodder Valley Park. Condition No. 6 of the original grant of permission for the wider development states that:

“The local amenity park and the five play spaces shown on the lodged plans shall be reserved as public open space and shall be soiled, levelled, seeded, landscaped and made available for use by the residents of the houses on the estate”.

It is important to note that all of the amenity space provided as part of the parent residential development are zoned Open Space in the current South Dublin County Development Plan 2022-2028 (SDCP) except the application site which is zoned 'Existing Res' i.e., the subject site has a land use zoning which can facilitate new residential development. It is not clear from the SDCCDP or the Planner's Report associated with the subject planning application as to why there is a land use zoning distinction between all of the

other areas of open space identified in the parent planning permission and the site which is the subject of this appeal. It could be argued that this zoning distinction is intended to facilitate the future development of the subject site as it represents an appropriate location for infill residential development.

It should be noted that the original open space provision for the parent planning permission included 3.71 acres of dedicated open space areas within the development as well as a financial contribution towards, what was at the time the 'proposed' Dodder Valley public park. On this basis it is reasonable to conclude that the Dodder Valley Park is providing integral public open space from which residents benefit (as provided for in the parent planning permission). While it would be unreasonable to suggest that the wider residential development benefits directly from the entirety of the Dodder Valley Park, some accounting needs to be made of the fact that a financial contribution levied on the original grant of planning permission contributed to the provision of the Park in the first instance, and that it was on this basis that planning permission for the development was granted. Using a 500m buffer from the application site would appear to be a reasonable and conservative estimate as to the areas of non-dedicated public open space that are available to and easily accessible to local residents i.e., the extent of the Dodder Valley Park that directly benefits the residents and which could reasonably be correlated to the financial contribution paid in respect of the provision of the Park. Within this 500-metre buffer, there is approximately 14 hectares of parkland.

Taking the dedicated open space provision within the wider residential development (3.71 acres) and the 14 hectares of the Dodder Valley Park located within a 500m buffer of the application site (which it could be reasonable to associate with the parent planning permission) would result in a gross public open space area of 15.5 ha. Using this metric, the area of open space serving the wider residential development that would be lost as a result of the proposed development would be less than 1%. While it is noted and accepted that the methodology set out above is not an exact science, we would contend that the Board must give some accounting of the Dodder Valley Park and its association with the parent planning permission by way of a financial contribution, when assessing the loss of the area comprising the application site.

5.1.6.3.2 **Quality of Open Space**

It is noted that, while the application site is relatively flat, is grassed and appears to be maintained regularly, it does not meet contemporary standards in respect of the qualitative standards for open space as set out in, for example, the Urban Design Manual (2009). The application site does not benefit from passive surveillance from surrounding houses as they are all orientated to face away from it and the area of open space is not integrated into the development in a manner that would be appropriate in a contemporary context. While there is a physical pedestrian connection between the application site and the remainder of the residential development it reads as incidental and distinct from the wider development, particularly in comparison to the other 4 no. areas of public open space within the development.

It is noted that the application of contemporary development management standards to older developments will often result in shortfalls or deficiencies. However, further to the discussion of the land use zoning anomaly between the application site and the other 4 no. areas of dedicated open space, it is possible that these considerations informed the land use zoning in the current development plan.

5.1.6.3.3 **Impact on Existing Residential Amenity, Function & Connectivity**

In MKO's view the key issue arising in respect of the proposed development and the Local Authority's decision to refuse planning permission for same relates to whether the redevelopment of this site would have an adverse impact on residential amenity. Indeed, this is cited as a key basis for refusal within SDCC's decision. MKO would contend that the redevelopment of the site would not have any significant impact on existing residential development given the existing extensive high quality network of open space in the immediate proximity to the application site (See Figure 3 below).

Residential Amenity & Function

There are a number of areas within the existing estate zoned OS "Open Space" including the laneway which runs along the boundary of the appeal site and provides rear access to houses in Knocklyon Heights and Delaford Avenue. The OS zoning extends to two other areas of open space zoned OS which are of similar size or larger to the site. Areas zoned Open Space in the immediate vicinity are identified in Figure 3 below, with distances of 200m and 800m indicated. The Board will note that there are extensive areas of land zoned OS. Areas within 200m of the subject site to the north and southeast of the site provide very high-quality amenity spaces that have connectivity with the Dodder Valley Park, along Firhouse Road and south through Delaford Park to the 1.89ha of amenity space at Knocklyon Road, <200m from the subject site. The lands that are zoned Open Space and as identified in Figure 3 below provide and will continue to provide an extensive network of high-quality amenity space. It could be argued that the development of the subject site may represent an incremental reduction of public open space in the locality. However, given the OS land use zoning of all of the other green spaces within the locality, these lands cannot in principle accommodate standard residential development proposals in future.

We would contend, respectfully, that the loss of the appeal site as an area of public amenity space, in the context of the network of high-quality amenity space identified in Figure 3 below will not result in any discernible impact on residential amenity or function and certainly would not result in an adverse impact to a degree that would warrant the refusal of planning permission for the proposed development. It is considered pertinent to again highlight that the proposed development accords with the land use zoning objective of the subject site.

Connectivity

The proposed development does not alter or remove the existing pedestrian link that is located adjacent to the southern boundary of the application site. There will be no adverse impact on connectivity arising from the proposed development and we would contend that there is no basis for the reference to connectivity as a basis on which to refuse planning permission.



Figure 3 Areas Zoned OS in the vicinity of subject site as per South County Dublin Development Plan 2022-2028

5.1.7 Refusal Reason No. 2

“The proposed development would materially contravene a condition attached to the planning permission for the existing Knocklyon Woods housing estate which identifies 5 no. areas within the development to be utilised as ‘play space’, one of which pertains to the subject lands. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”

5.1.8 Response

A review of copies of the original planning drawings appear to indicate that the subject site was identified as one such ‘play space’ although it should be noted that the quality of the original drawings is poor and there is a degree of ambiguity as to the exact wording/meaning of some annotations, labels and legends.

Notwithstanding the above, the Board will note that the planning permission in question is 52 years old. It obviously takes no account of how the local area has developed in the interim or the present-day planning policy context in which the lands sit. We would respectfully suggest that reliance on a planning condition attached to a planning permission granted in 1971, and the refusal of planning permission for a present-day development proposal is disproportionate and is not an approach which accords with the principles of proper planning and sustainable development. We would contend that the proposed development merits a contemporary assessment based on the characteristics of the site and the surrounding area as well as the current planning policy context. Furthermore, taking into account the current planning policy context and the matters set out in Section 5.1.6 above, it is considered that the proposed development would not result in an adverse impact on existing residential amenity, would accord with national, regional and local planning policy and would accord with the proper planning and sustainable development of the area.

5.1.9 Refusal Reason No. 3

“The proposed residential accommodation is considered substandard in relation to private amenity space. The under-provision of usable and good quality private amenity space would suggest the proposal would be an overdevelopment of the site. In addition, insufficient information has been submitted in relation to the proposed vehicular accesses, to the satisfaction of SDCC's Roads Department. It is considered that proposed development would provide insufficient amenities to prospective occupants and is contrary to the proper planning and sustainable development of the area.”

5.1.10 Response to Reason 3

In response to the design issues raised in Refusal Reason No. 3 Vincent Hannon Architects & Jennings O Donovan Consulting Engineers have made amendments to the design of the proposed development and we enclose with this appeal revised architectural and engineering drawings in respect of same. In terms of the legislative basis for such minor amendments we note there are no statutory provisions governing the amendment of a planning application or appeal and it is a matter of discretion of the Planning Authority or the Board. Also, we note from case law (British Telecommunications PLC V Gloucester City Council 2001), the following factors emerge for consideration:

- (i) Whether the amendment would alter the substance of the development applied for:
- (ii) Whether those who should have been consulted on the changed development would be deprived of such consultation.

In the context of the above we submit both factors (i & ii) above are not applicable, no prejudice is caused to third parties and request the Board to accept revisions as proposed to be considered under this appeal.

The following sections describe proposed amendments to the design which aim to resolve concerns raised by the Planning Authority in the Planners Report and supporting reports available on the planning file. Concerns were in relation to the provision of private amenity space, vehicular access, SUDS, and signage and the retention of trees. The following sections should be read in conjunction with the updated design drawings enclosed with this appeal submission.

5.1.10.1 Private Amenity Space

In order to increase the quantum of private amenity space the house design has been amended. The ground level rear extension has been reduced by 12sq.m. This has reduced the internal floor area by 12sq.m from the aggregate area of the living/dining/kitchen which remains compliant with the minimum standard of 40sq.m. (40sq.m and 46sq.m being provided). The private amenity open spaces for house one to four have increased from 71.4, 71sq.m, 70sq.m and 71sq.m to 83sq.m, 83sq.m, 83sq.m and 85sq.m respectively.

5.1.10.2 Vehicular Access

The Roads Division of South County Dublin raised a concern on the arrangement of vehicular access and requested further information in the report provided to the Planning Department. The report stated that the quantum of car parking provided on the site is acceptable. The number of entrances proposed however is raised as a concern, as such a revised entrance design is submitted as part of this appeal is identified in enclosed Drawings No.'s (Drawing ref. 6902-JOD-XX-ZZ-DR-C-002, Drawing ref. 6902-JOD-XX-ZZ-DR-C-002-01, & Drawing ref. 6902-JOD-XX-ZZ-DR-C-003). The proposed amendment reduces the number of vehicular entrances from 2 no. to 1 no. The vehicular access points are 3.5m wide and an updated auto track analysis (drawing ref. 6902-JOD-XX-ZZ-DR-C-002-01) has been conducted which demonstrates that vehicles can adequately enter, park and exit the development in a forward-facing direction. Parking spaces are designed to accommodate e-charging capabilities.

The revised plans also include additional Sustainable Urban Drainage (SUDS) measures including permeable paving to the driveway of the units (Drawing ref. 6902-JOD-XX-ZZ-DR-C-001) and new blocked 2m high rear boundary walls (Drawing ref. 180201-3-103). Additionally, the revised site entrance design allows for the retention of trees otherwise proposed for removal. The removal of 2 no. trees in total is proposed in order to maintain sightlines for exiting vehicles. The applicant would agree to the replacement of trees proposed to be removed and would propose to offset the removal by planting 4 no. mature trees in a location which is acceptable to the parks Department.

5.1.10.3 Footpaths and Crossing

The Report by the Roads Department of South Dublin County Council noted that, should permission be granted for the proposed development, that the footpath and kerb shall be dished and widened, and the dropped crossing shall be constructed to the satisfaction of South Dublin County Council and at the applicant's expense. The applicant wishes to note that they are in agreement with this proposal and would have no objection to a condition of this type. Drawing Ref. 6902-JOD-XX-ZZ-DR-C-002 has noted the locations of the dished kerbs.

5.1.10.4 Setback Distances

The report by the Roads Division of South Dublin County Council sought confirmation that there was a minimum of 6m from the boundary to the front elevation of the proposed dwellings. The distance from the site boundary to the front elevation of the proposed dwellings is 6.2m. For clarity a 6.2m measurement has been included on enclosed Drawing No. 6902-JOD-XX-ZZ-DR-C-002.

5.1.10.5 Public Lighting

The report by the Roads Division of South Dublin County Council requested that, should permission be granted for the proposed development that, prior to commencement a Public Lighting Design for the development must be submitted and agreed by the South Dublin County Council Lighting Department.

The applicant wishes to note that there is existing public lighting in place along Knocklyon Road which adequately serves the site. However, in order to address the concern raised above, the applicant will appoint a suitably qualified lighting designer to review and propose additional/revised street lighting in the region to South Dublin County Council Lighting Department for agreement.

5.1.10.6 Signage

The Roads Division South Dublin County Council questioned details of existing or proposed signage. The applicant wishes to note that the existing signage is indicated on Drawing No: 6902-JOD-XX-ZZ-DR-C-002. There is no additional signage proposed.

Matters addressed in section 5.1.10 and the proposed amended access and private open space changes clearly demonstrates that the applicant has addressed concerns raised by the Roads Department of South Dublin County Council and the Planning Department.

5.1.10.7 Public Open Space

The applicant would propose to offer a pro-rata financial contribution in lieu of the provision of public open space due to the small size, infill nature and configuration of the application site (bounded by a public road to the west and a public footpath to the south). It should also be noted that, as evidenced in Figure 3 above, there is an extensive network of existing public open spaces located within 500m of the proposed development.

6. **CONCLUSION**

This Grounds of Appeal demonstrates that the proposed development is appropriate at this location taking due consideration of the South Dublin County Development Plan 2022 - 2028, as well as the National Planning Framework, Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031 along with other relevant national planning policy documents. The Proposed Development is also in keeping with the proper planning and sustainable development of the area. In view of the above, and the matters set out in the Grounds of Appeal, we respectfully request that An Bord Pleanála considers the first party Grounds of Appeal and grants permission for the proposed development.

Land Registry Compliant Map



CENTRE COORDINATES:
ITM 711680,727433

PUBLISHED: 20/05/2019 ORDER NO.: 50063488_1

MAP SERIES: 1:1,000 MAP SHEETS: 3390-15

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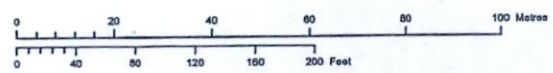
LEGEND:
<http://www.osi.ie>;
search 'Large Scale Legend'



AREA OUTLINE IN RED = 0.087 H/A = 0.21ACRES

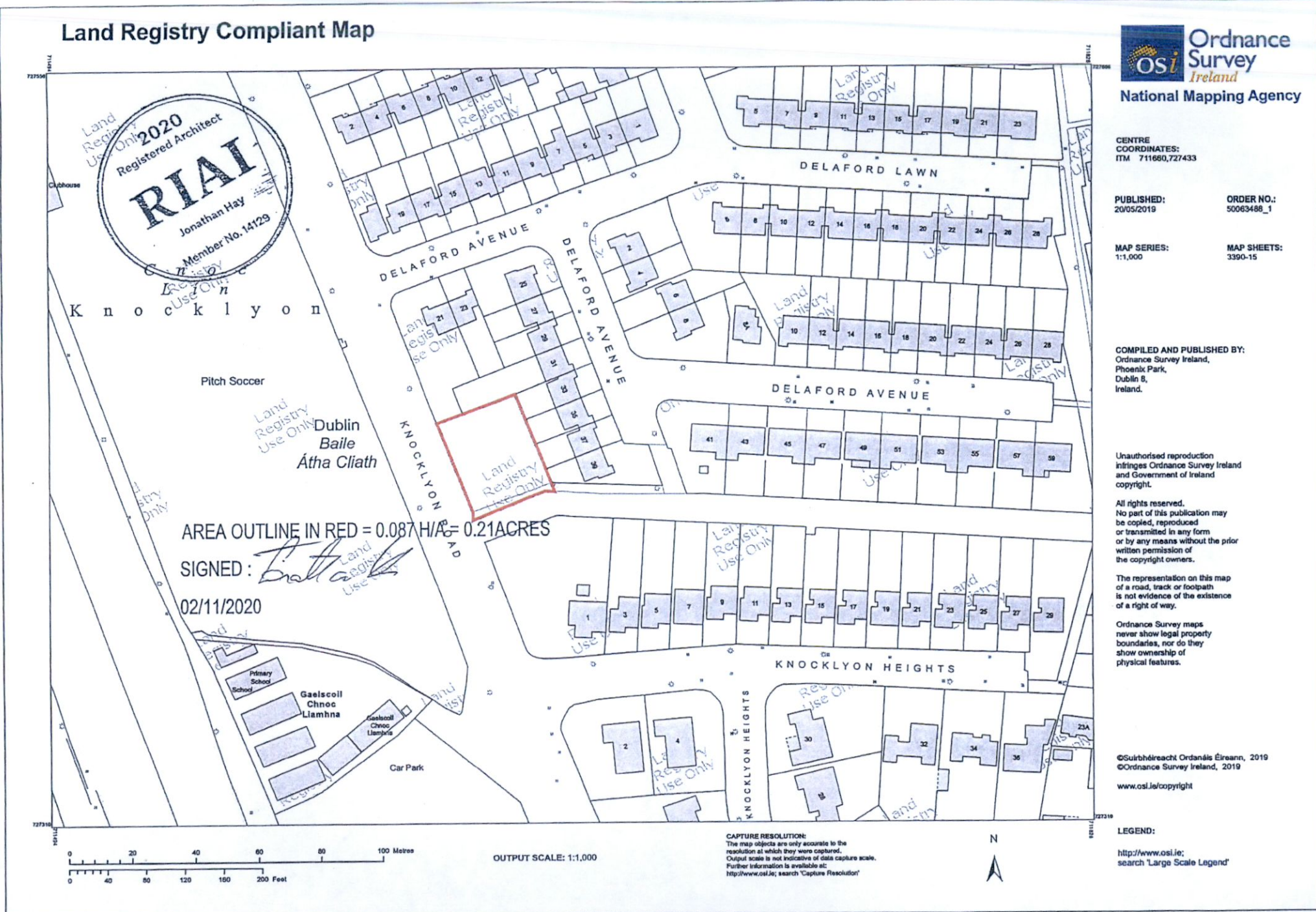
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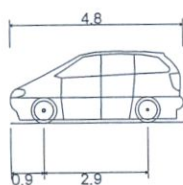
02/11/2020



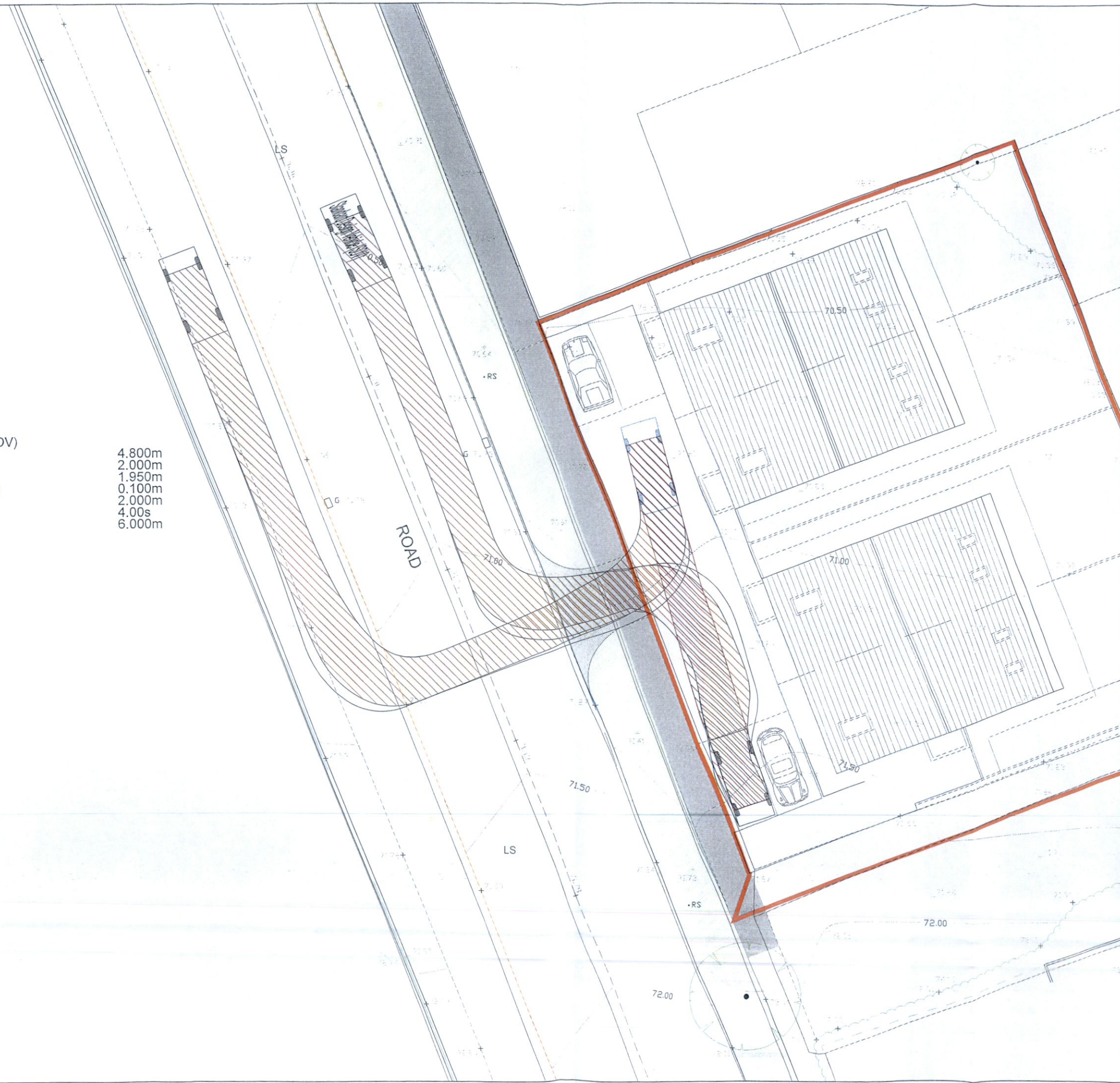
OUTPUT SCALE: 1:1,000

CAPTURE RESOLUTION:
The map objects are only accurate to the
resolution at which they were captured.
Output scale is not indicative of data capture scale.
Further information is available at:
<http://www.osi.ie>; search 'Capture Resolution'





Standard Design Vehicle (SDV)
 Overall Length 4.800m
 Overall Width 2.000m
 Overall Body Height 1.950m
 Min Body Ground Clearance 0.100m
 Track Width 2.000m
 Lock to lock time 4.00s
 Wall to Wall Turning Radius 6.000m



NOTES

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LEGEND

SITE BOUNDARY INDICATED THUS



NORTH SIGN INDICATED THUS



Site Area:-
 843m², 0.2083 Acres, 0.0843 Hectares
 ITM Co-Ordinates of site:-
 711636, 727432

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OS Sheet No.3390-15



P.01	Planning Issue	SL	MF	23.02.23
rev.	modifications	by	chkd	date

Layout Ref.:
 File: P:\uob-jobs\6902 Apt Block Knocklyon\700 Drawings\703 Planning\01 WIP\Feb 2023 Appeal WIP Dwg\6902-JOD-002-Autotrack-PC.dwg

client
 PATHWAY HOMES LTD.

project
 PROPOSED RESIDENTIAL DEVELOPMENT AT SITE, KNOCKLYON ROAD, DUBLIN

stage
 PLANNING

title
 PROPOSED ROAD LAYOUT PLAN - AUTOTRACK ANALYSIS

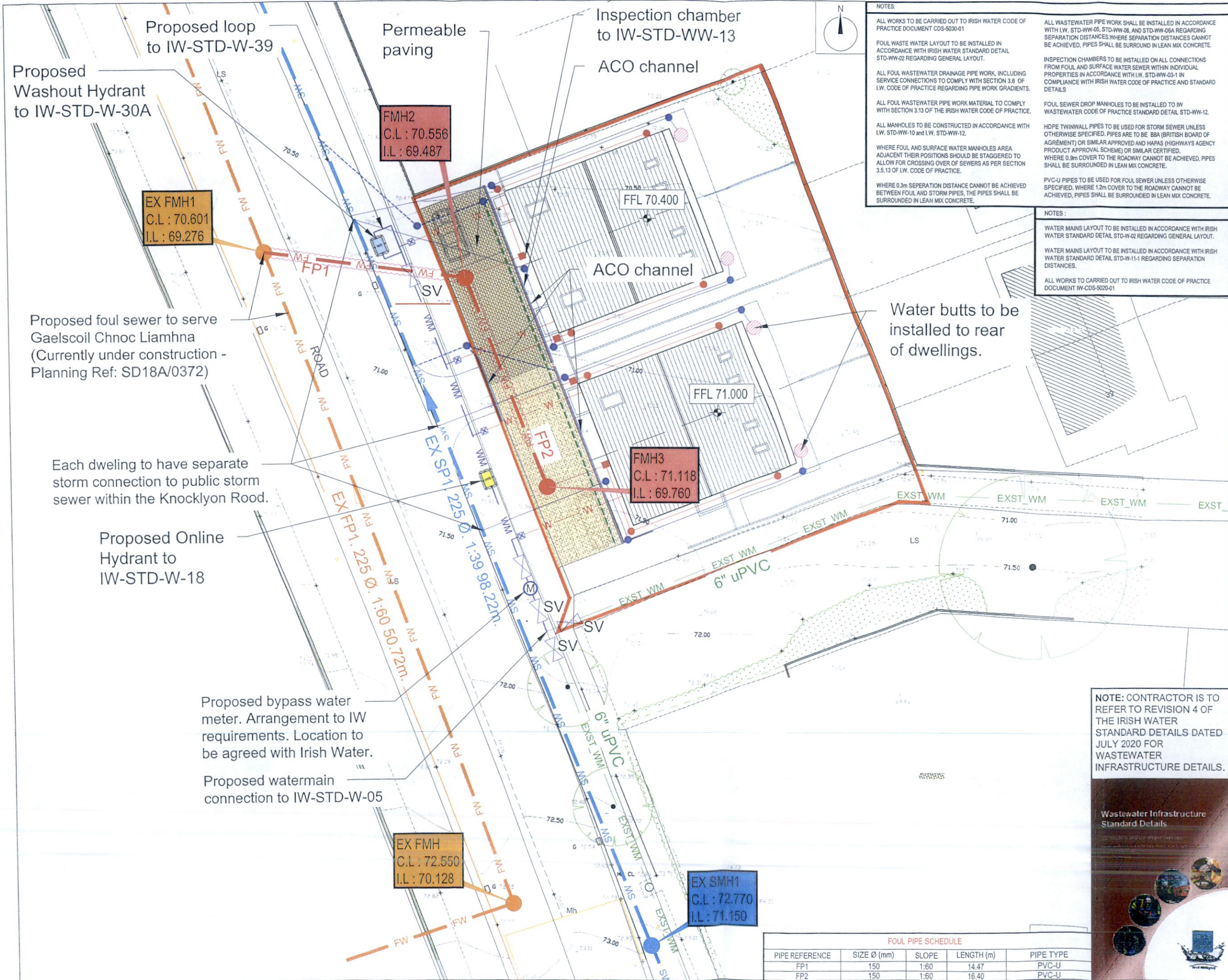
scale
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surveyed	drawn	checked	date
SL	SL	MF	Feb 2023

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drawing no.	revision
6902-JOD-XX-ZZ-DR-C-002-01	P.01



NOTES:

ALL WORKS TO BE CARRIED OUT TO IRISH WATER CODE OF PRACTICE DOCUMENT CDS-5030-01

FOUL WASTE WATER LAYOUT TO BE INSTALLED IN ACCORDANCE WITH IRISH WATER STANDARD DETAIL STD-WW-02 REGARDING GENERAL LAYOUT.

ALL FOUL WASTE WATER DRAINAGE PIPE WORK, INCLUDING SERVICE CONNECTIONS TO COMPLY WITH SECTION 3.8 OF I.W. CODE OF PRACTICE REGARDING PIPE WORK GRADIENTS.

ALL FOUL WASTE WATER PIPE WORK MATERIAL TO COMPLY WITH SECTION 3.13 OF THE IRISH WATER CODE OF PRACTICE.

ALL MANHOLES TO BE CONSTRUCTED IN ACCORDANCE WITH I.W. STD-WW-10 AND I.W. STD-WW-12.

WHERE FOUL AND SURFACE WATER MANHOLES AREA ADJACENT THEIR POSITIONS SHOULD BE STAGGERED TO ALLOW FOR CROSSING OVER OF SEWERS AS PER SECTION 3.5.13 OF I.W. CODE OF PRACTICE.

WHERE 0.3m SEPARATION DISTANCE CANNOT BE ACHIEVED BETWEEN FOUL AND STORM PIPES, THE PIPES SHALL BE SURROUNDED IN LEAN MIX CONCRETE.

ALL WASTEWATER PIPE WORK SHALL BE INSTALLED IN ACCORDANCE WITH I.W. STD-WW-05, STD-WW-06, AND STD-WW-06A REGARDING SEPARATION DISTANCES WHERE SEPARATION DISTANCES CANNOT BE ACHIEVED, PIPES SHALL BE SURROUNDED IN LEAN MIX CONCRETE.

INSPECTION CHAMBERS TO BE INSTALLED ON ALL CONNECTIONS FROM FOUL AND SURFACE WATER SEWER WITHIN INDIVIDUAL PROPERTIES IN ACCORDANCE WITH I.W. STD-WW-03-1 IN COMPLIANCE WITH IRISH WATER CODE OF PRACTICE AND STANDARD DETAILS

FOUL SEWER DROP MANHOLES TO BE INSTALLED TO IW WASTEWATER CODE OF PRACTICE STANDARD DETAIL STD-WW-12.

HDPE TWINWALL PIPES TO BE USED FOR STORM SEWER UNLESS OTHERWISE SPECIFIED. PIPES ARE TO BE BBA (BRITISH BOARD OF AGREEMENT) OR SIMILAR APPROVED AND HAPAS (HIGHWAYS AGENCY PRODUCT APPROVAL SCHEME) OR SIMILAR CERTIFIED. WHERE 0.9m COVER TO THE ROADWAY CANNOT BE ACHIEVED, PIPES SHALL BE SURROUNDED IN LEAN MIX CONCRETE.

PVC-U PIPES TO BE USED FOR FOUL SEWER UNLESS OTHERWISE SPECIFIED. WHERE 1.2m COVER TO THE ROADWAY CANNOT BE ACHIEVED, PIPES SHALL BE SURROUNDED IN LEAN MIX CONCRETE.

NOTES:

WATER MAINS LAYOUT TO BE INSTALLED IN ACCORDANCE WITH IRISH WATER STANDARD DETAIL STD-W-02 REGARDING GENERAL LAYOUT.

WATER MAINS LAYOUT TO BE INSTALLED IN ACCORDANCE WITH IRISH WATER STANDARD DETAIL STD-W-11-1 REGARDING SEPARATION DISTANCES.

ALL WORKS TO CARRIED OUT TO IRISH WATER CODE OF PRACTICE DOCUMENT IW-CDS-5020-01

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LEGEND

SITE BOUNDARY INDICATED THUS

PROPOSED NEW LOCAL FOUL DRAINAGE

PROPOSED NEW LOCAL FOUL DRAINAGE

PROPOSED NEW FOUL SEWER

PROPOSED NEW FOUL SEWER MANHOLE

EXISTING STORM SEWER

EXISTING FOUL SEWER

EXISTING STORM SEWER MANHOLE

EXISTING FOUL SEWER MANHOLE

PROPOSED WASHOUT HYDRANT TO IW-STD-W-30A

PROPOSED WASHOUT HYDRANT TO IW-STD-W-30A

PROPOSED BULK WATER METER

PROPOSED WATER SUPPLY CONNECTION

PROPOSED 100mm Ø HDPE WATERMAIN

EXISTING WATERMAIN

PROPOSED SLUDGE VALVE

PIPES TO BE SURROUNDED WITH LEAN MIX CONCRETE

PROPOSED ACO DRAIN

PROPOSED WATER BUTTS

EXISTING LEVELS

PERMEABLE PAVING

PERMEABLE PAVING CONVEYANCE PIPE

Site Area:-
843m², 0.2083 Acres, 0.0843 Hectares
ITM Co-Ordinates of site:-
711636, 727432
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OS Sheet No.3390-15

P.02	Planning Issue	SL	MF	23.02.23
P.01	Planning Issue	SL	MF	26.10.22
rev.	modifications	by	chkd	date

Layout Ref.:

file: P:\Jod-jobs\6902-Apt Block Knocklyon\700 Drawings\703 Planning\01 WWPFeb 2023 Appeal WP Dwg66902-JOD-001.dwg

client
PATHWAY HOMES LTD.

project
PROPOSED RESIDENTIAL DEVELOPMENT AT SITE, KNOCKLYON ROAD, DUBLIN

stage
PLANNING

title
PROPOSED FOUL, STORM AND WATERMAIN SITE LAYOUT PLAN

scale
1:250 @ A3

surveyed	drawn	checked	date
	SL	MF	Oct 2022

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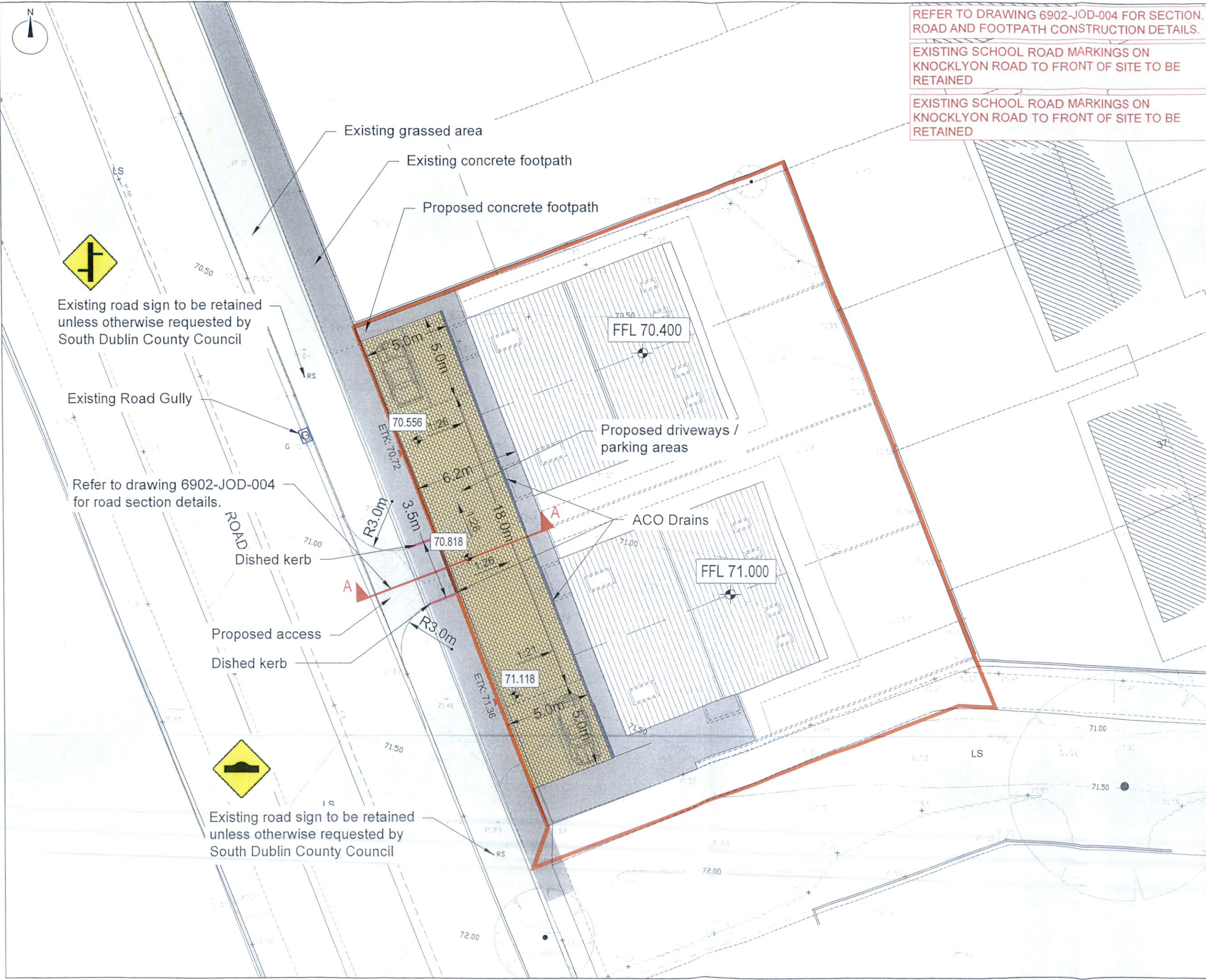
drawing no.
6902-JOD-XX-ZZ-DR-C-001

revision
P.02

FOUL PIPE SCHEDULE

PIPE REFERENCE	SIZE Ø (mm)	SLOPE	LENGTH (m)	PIPE TYPE
FP1	150	1:60	14.47	PVC-U
FP2	150	1:60	16.40	PVC-U

NOTE: CONTRACTOR IS TO REFER TO REVISION 4 OF THE IRISH WATER STANDARD DETAILS DATED JULY 2020 FOR WASTEWATER INFRASTRUCTURE DETAILS.



REFER TO DRAWING 6902-JOD-004 FOR SECTION, ROAD AND FOOTPATH CONSTRUCTION DETAILS.

EXISTING SCHOOL ROAD MARKINGS ON KNOCKLYON ROAD TO FRONT OF SITE TO BE RETAINED

EXISTING SCHOOL ROAD MARKINGS ON KNOCKLYON ROAD TO FRONT OF SITE TO BE RETAINED

Existing road sign to be retained unless otherwise requested by South Dublin County Council

Refer to drawing 6902-JOD-004 for road section details.

Existing road sign to be retained unless otherwise requested by South Dublin County Council

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LEGEND

- SITE BOUNDARY INDICATED THIS
- NORTH SIGN INDICATED THIS
- PROPOSED LEVELS 30.60
- EXISTING LEVELS 24.30
- PERMEABLE PAVING, SEE DWG 6902-JOD-004 FOR ROAD BUILD UP.
- EXISTING FOOTPATH AREA TO BE REINSTATED AND RETAINED AS VEHICULAR ACCESS TO DWELLINGS
- EXISTING GRASSED AREA TO BE REPLACED WITH ACCESS ROAD
- EXISTING TOP OF KERB LEVEL TO BE RETAINED ETK: 70.72
- DISHED KERB

Site Area:-
843m², 0.2083 Acres, 0.0843 Hectares
ITM Co-Ordinates of site:-
711636, 727432

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client
PATHWAY HOMES LTD.

project
PROPOSED RESIDENTIAL DEVELOPMENT AT SITE, KNOCKLYON ROAD, DUBLIN

stage
PLANNING

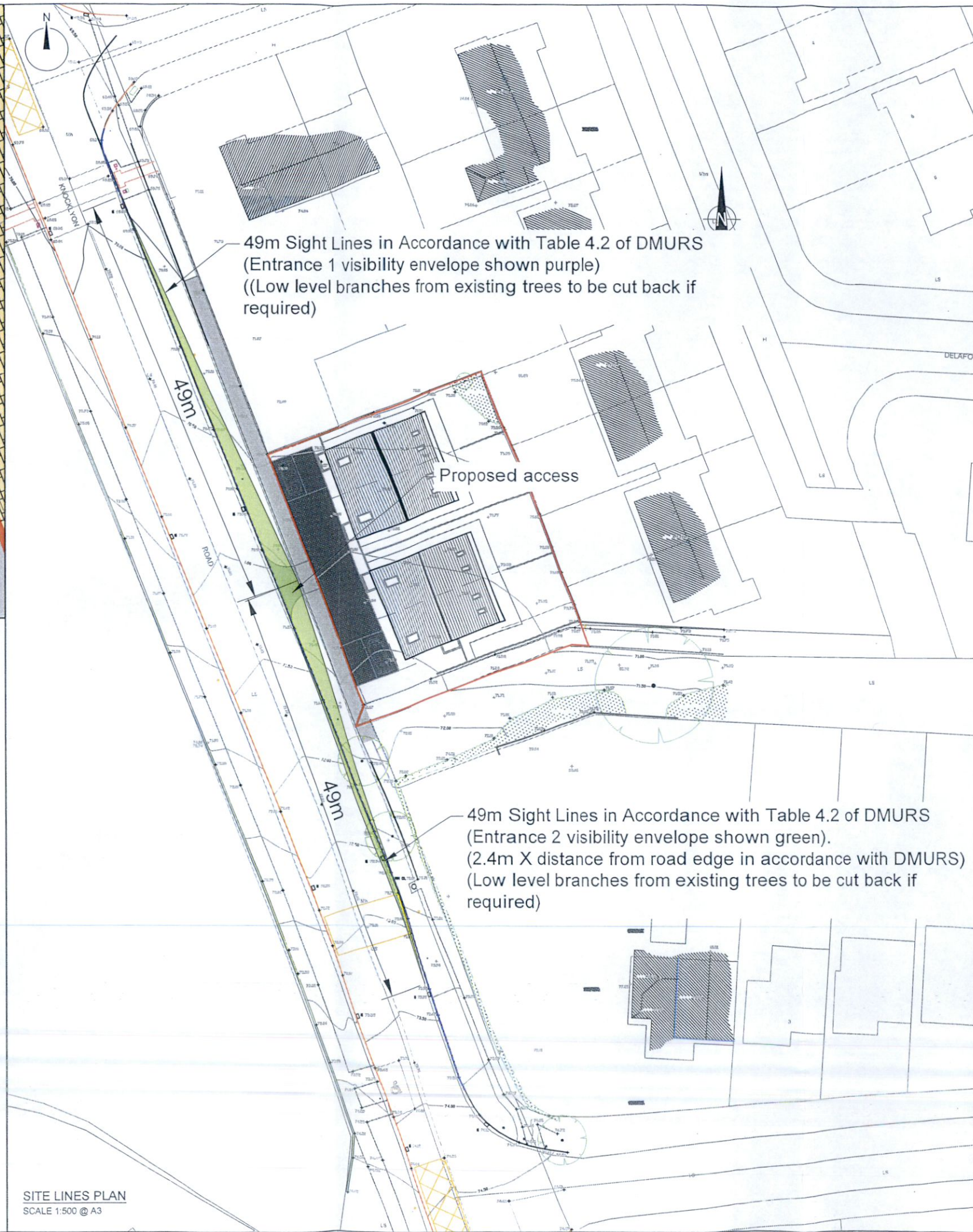
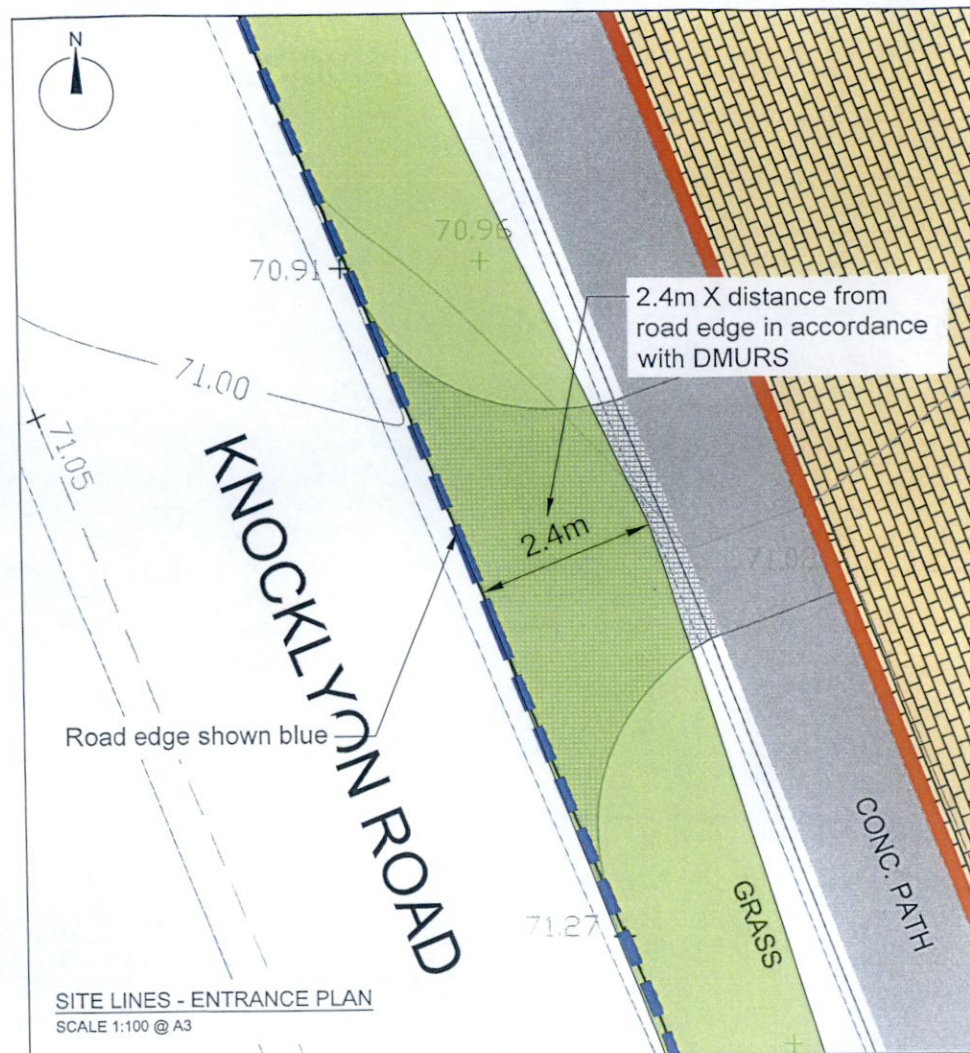
title
PROPOSED ROAD LAYOUT PLAN

scale
1:200 @ A3

surveyed	drawn	checked	date
SL	MF	MF	Oct 2022

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drawing no. 6902-JOD-XX-ZZ-DR-C-002 revision P.02



NOTES

GENERAL NOTES:

1. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THIS DRAWING.
2. ALL DRAWINGS TO BE CHECKED BY THE CONTRACTOR ON SITE.
3. ENGINEER/EMPLOYERS REPRESENTATIVE, AS APPROPRIATE, TO BE INFORMED BY THE CONTRACTOR OF ANY DISCREPANCIES BEFORE ANY WORK COMMENCES.
4. THE CONTRACTOR SHALL UNDERTAKE A THOROUGH CHECK FOR THE ACTUAL LOCATION OF ALL SERVICES/UTILITIES, ABOVE AND BELOW GROUND, BEFORE ANY WORK COMMENCES.
5. ALL LEVELS SHOWN RELATE TO ORDNANCE SURVEY DATUM AT MALIN HEAD.
6. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT DRAWINGS AND SPECIFICATIONS. CONTRACTOR TO VERIFY THE ACCURACY OF THIS PROPOSAL TO THE ENGINEER AND ALLOW FOR MINOR CORRECTIONS AS DEEMED NECESSARY WITH A REASONABLE TIMEFRAME.

LEGEND

SITE BOUNDARY INDICATED THIS

NORTH SIGN INDICATED THIS

Site Area:-
843m², 0.2083 Acres, 0.0843 Hectares
ITM Co-Ordinates of site:-
711636, 727432

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OS Sheet No.3390-15

P.02	Planning Issue	SL	MF	23.02.23
P.01	Planning Issue	SL	MF	26.10.22
rev.	modifications	by	chkd	date

Layout Ref.:

file P:\suo-jobs\6902 Apt Block Knocklyon\700 Drawings\703 Planning\01 WPFeb 2023 Appeal WP Dwg\6902-JOD-003.dwg

client
PATHWAY HOMES LTD.

project
PROPOSED RESIDENTIAL DEVELOPMENT AT SITE, KNOCKLYON ROAD, DUBLIN

stage
PLANNING

title
SIGHT LINES PLAN

scale
AS SHOWN @ A3

surveyed	drawn	checked	date
	SL	MF	Oct 2022

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revision
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