

South Dublin County Council
County Hall,
Belgard Square North,
Tallaght,
Co. Dublin
D24 A3XC



27th February 2023

Planning Ref: SD22A/0286

RE: ADDITIONAL INFORMATION Submission with respect to Planning Reference SD22A/0286 – Deane & Deane Ltd, - PERMISSION for the demolition of 2 no. sheds and the construction of 30 no. dwellings, at Main Street, Newcastle, Co. Dublin.

Dear Sir/Madam,

On behalf of our client, Deane & Deane Ltd, please find below our response to the request for additional information made by South Dublin County Council issued 23rd August 2022 with regard the above development.

Additional information items have been included within this letter in grey text. These items have been addressed in black text which follows each item, numbered Item 1 through Item 16. Where these items have not been directly addressed in this letter, please see the attached reports and drawings referenced within these responses that are attached as part of this additional information submission. Please refer to the enclosed Schedule of Documents.

Responses to Items 1-16 of the Additional Information request are outlined as follows:

Item 1

The applicant is advised that the South Dublin County Development Plan 2022-2028 is now the relevant Development Plan. The applicant is advised that the Planning Authority has concerns in relation to the provision of public open space associated with residential development on the Rural (RU) zoned lands. Section 8.7.3 of the Development Plan requires an overall standard of 2.4ha per 1,000 people, including a minimum provision of 15% on site and details that there are options at the discretion of the Planning Authority in relation to the provision of some of the overall standard (2.4ha per 1,000) off site. As such, under the Development Plan, there may be scope for the Rural zoned lands to be used as public open space as part of an off-site/ outside zoning provision. The applicant is requested to review Section 8.7.3 and address the following:

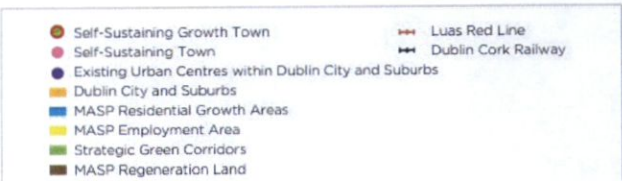
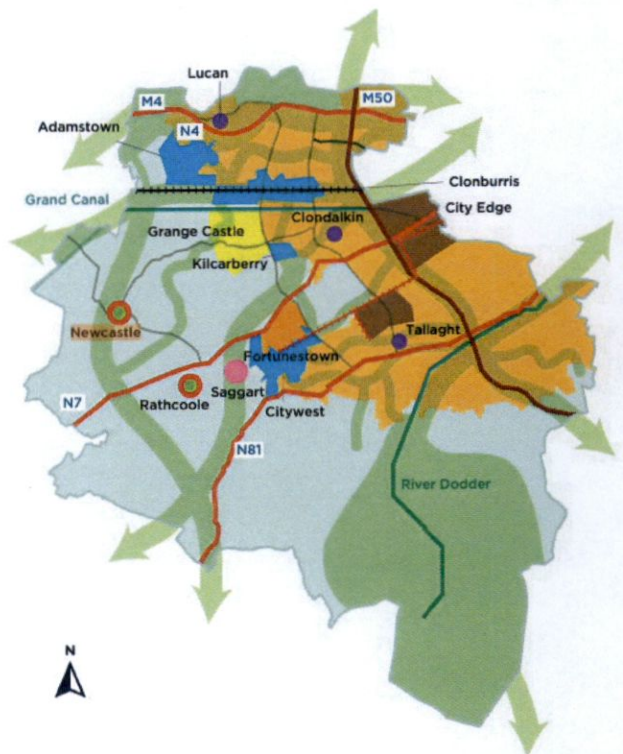
- a) submit a clear breakdown of the area (in hectares) of the site zoned Residential, Rural and Village Centre.
- b) a public open space calculation based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.
- c) a minimum of 15% of the RES-N lands provided as public open space.
- d) demonstrate compliance with Section 8.7.3: and

- e) The west and northwest elements of the site is zoned 'RU' - To protect and improve rural amenity and to provide for the development of agriculture'. It is noted that an area of public open space as well as an element of car parking and roads infrastructure are proposed to be located within this zone, which could be considered ancillary 'residential' in nature. Residential is open for consideration within the RU zoning 'In accordance with Council policy for residential development in rural areas. The applicant is requested to demonstrate that these elements of the proposal are consistent with the referenced Council policy and consider amending the proposal.

Response to Item 1:

Background – South Dublin County Development Plan (SDCDP) Policy:

Newcastle is a designated Self-Sustaining Growth Town in the SDCDP. The Newcastle LAP, as extended, is in effect until December 2022



Newcastle - Self-Sustaining Growth Town


The Newcastle settlement had a population in 2016 of 3,093 which is targeted to grow between the period 2022-2028 by 1,094 persons (35%) to 4,187 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 of 935 people this equates to an overall growth of 2,049 (65%) persons over the period 2017 to 2028. On this basis, the settlement can be categorised as a medium sized town. The jobs to residents ratio in 2016 was 0.215¹² which indicates a net-outflow commuter-based settlement which is dependent on other areas for jobs. However, as set out in the asset-based analysis in Appendix 2B, the nearby Greenogue and Baldonnell Business Parks provide local jobs within close proximity to the settlement increasing this ratio to circa. 2.25.

The growth in Newcastle is mainly focused on the adopted Local Area Plan.

The overarching principle for the town is to improve the social and physical services to provide for the growing population. A phased sequential approach to development from the village core to the north and south recognises the ongoing construction activity and the delivery of key infrastructure identified in the Newcastle Local Area Plan.

Policy CS9: Newcastle

Support the sustainable long-term growth of Newcastle by focusing development growth within the current settlement boundary and based on the ability of local services to cater for sustainable growth levels.

<p>CS9 Objective 1: To ensure that development proposals provide for infrastructure including community buildings, sports pitches and service provision in line with population growth as set out in the Newcastle LAP (2012 extended to December 2022) or any succeeding plan.</p>
<p>CS9 Objective 2: To support well designed infill and brownfield development on zoned lands along the main street, in particular where it provides for improved services, commercial, retail or mixed use provision to meet the needs of the growing population. </p>
<p>CS9 Objective 3: To proactively support and promote the highest appropriate levels of services, social infrastructure, facilities, retail, open space amenity and economic activity to meet the needs of current and future growth in line with the scale and function of Newcastle within the settlement hierarchy.</p>
<p>CS9 Objective 4: To facilitate and commit to the delivery of new residential development in a coordinated manner, ensuring alignment with investment infrastructure and supporting amenities and services. Such measures shall be delivered through appropriate phasing in line with CS9 SLO1, SLO2, SLO3 and SLO4.</p>
<p>CS9 SLO1: To facilitate and commit to the delivery of Phase 1 residential lands at Burgage North in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</p>
<p>CS9 SLO2: To facilitate and commit to the delivery of Phase 1 residential lands at Burgage North to the north of St. Finian's Community Centre which reserve suitable lands to facilitate the extension of the existing community centre.</p>

The proposed development provides residential accommodation in accordance with the above objectives of the SDCDP.

In the context of the development's contribution to Community Infrastructure including Open Space, the full extent of Chapter 8 of the SCDP should be taken into account. The proposed development is supported by two elements of Community Infrastructure – the provision of land in the applicant's ownership for expansion of the St Finnian's Community Centre on Main Street and Open Space substantially located on RU land, as a small residential amenity located within 100m of all houses as provided for within Ch 8 of the SDCDP.

Chapter 8 includes the following: -

8.4 Social / Community Infrastructure

The Council recognises that the provision of good quality social and community facilities in existing and developing areas is a key element in placemaking and in the creation of sustainable and socially cohesive communities. Social / community infrastructure is a vital part of all neighbourhoods and contributes greatly to the social fabric and quality of life. Community facilities serve as focal points for the neighbourhoods they serve and provide

opportunities for interaction through local community, sporting, cultural, the arts, educational and social events. These activities increase personal well-being and add to our sense of place and local identity. Good quality community facilities can also boost the attractiveness of an area for those who choose to live, work or invest in it.

The contribution to Community Facilities is significant, providing 509m² to facilitate an extension scheme prepared by SCDD Architects Department. Section 8.4 of the SDCP sets out objectives for collaboration with stakeholders/developers in the provision of community infrastructure, as follows:

<p>Policy COS2: Social / Community Infrastructure</p> <p>Support the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities, close to the communities they serve, consistent with RPO 9.14 of the RSES. (See also Chapter 5: <i>Quality Design and Healthy Placemaking</i>)</p>
<p>COS2 Objective 1:</p> <p>To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for a period of review to adapt to the needs of an increasingly multi-cultural and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.</p>
<p>COS2 Objective 2:</p> <p>To continue to work closely with the Health Service Executive, Department of Education and the relevant public bodies and state agencies to meet the necessary provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.</p>

Open Space calculation in accordance with section 8.7.3 is explained herein. The scale and function of the primary Open Space is consistent with the Smaller Residential Open Space category on Table 8.1 of the SDCP.

Where there is a combined offer of Community Space and Open Space a compensatory approach is normally taken. In this case Community Space, located on land owned by the applicant, outlined in Blue, is offered to SDCC. It is within the rights of SDCC to impose conditions in respect of this land under the provisions of section 34(4)(a) of the Planning and Development Act (PDA), insofar as appears to the planning authority to be expedient for the purposes of or in connection with the development authorised by the permission.

Also, section 34(4)(m) of the PDA applies where public facilities in excess of the immediate needs of the proposed development are conditioned, subject to the planning authority paying for the cost of additional works and taking them in charge or otherwise entering into an agreement with the applicant with respect to the provision of those public facilities.

Item 1 a). submit a clear breakdown of the area (in hectares) of the site zoned Residential, Rural and Village Centre.

The Gross Site Area (red line) is 1.33 ha.

A breakdown of the zoning areas is as follows:

Lands Zoned RES	0.04 ha
Lands Zoned RES-N	0.83 ha
Lands Zoned Rural Amenity (RU)	0.39 ha
Lands Zoned Village Centre (VC)	0.04 ha

Please refer to the Site Zoning Plan prepared by JFOC Architects for an illustration of these areas.

Item 1 b). a public open space calculation based on an occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms;

The revised proposal provides 2 no. 2-bed units and 27 no. 3-bed units.

Based on the above, the occupancy rate is calculated as follows: -

2 x 1.5 = 3 persons
 27 x 3.5 = 95 persons
 Total = 98 persons.

Table 8.2 of the SDCDP requires an overall standard of 2.4ha of open space per 1,000 population. The proposed development will provide c.10% of that population and therefore will require 0.24ha (2,400m²) of open space. 0.36ha (3,600m²) of open space is provided as part of the subject application, which is greater than the requirement set out in Table 8.2.

Item 1 c). a minimum of 15% of the RES-N lands provided as public open space;

The area of the site in RES-N is 0.83ha. 15% of that area equals 0.1245ha. As shown in the site layout extract below, some of this allocation is provided on land zoned RES-N and some in lands zoned RU. 12% of the RES-N lands are provided as public open space and the remainder of the total 3,600m² of public open space is provided on RU lands. 27% of the overall site area is provided as public open space.

It is considered that, in the context of the subject site, primarily providing the public open space in one useable area on the lands zoned RU is the most efficient use of the overall landholding, with the open space readily accessible to the resident population. The residential development is confined to the lands zoned RES-N (0.83ha in area) in order to provide a development with a sustainable density of c.32.3 units per hectare on zoned and serviced urban lands. The overall application site is not confined to lands zoned RES-N and while the open space is not entirely provided within the RES-N zoning, the open space is fully provided within the application site area.

With all of the open space provided on-site, the applicant is not reliant on the less satisfactory provisions of Section 8.7.4 of the SDCDP, which provides the following guidance: -

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.

This subject proposal provides 3,600m² of accessible and usable open space on RU zoned lands. The area of open space provided greatly exceeds the minimum area required in the SDCDP.

The SDCDP provides a Specific Local Objective (SLO) for the lands zoned RES-N within the application site as follows: -

CS9 SLO2: To facilitate and commit to the delivery of Phase 1 residential lands at Burgage North to the north of St. Finian's Community Centre which reserve suitable lands to facilitate the extension of the existing community centre.

The proposal is consistent with this specific objective in addition to the generous on-site open space allocation.

Item 1 d). demonstrate compliance with Section 8.7.3: and

Section 8.7.3 of the SDCDP includes Table 8.2, which includes the standards for public open space.

Table 8.2: Public Open Space Standards

Land Use	Public Open Space Standards (minimum)
Overall Standard	2.4 Ha per 1,000 Population
New Residential Development on Lands Zone RES-N	Minimum 15% of site area
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area

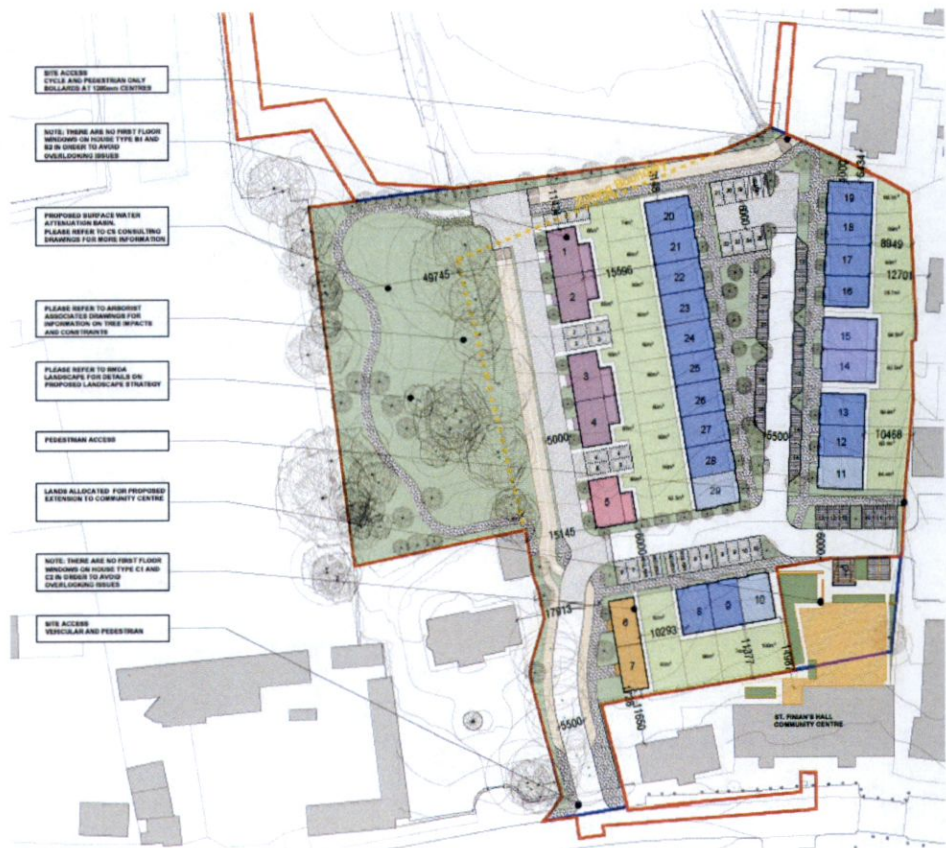
Details of compliance with the overall standard and the standard for new residential development on lands zoned RES-N are provided above under part b) and c). The remaining two standards in Table 8.2 are not applicable to the subject proposal.

Item 1 e). The west and north west elements of the site is zoned 'RU' - To protect and improve rural amenity and to provide for the development of agriculture'. It is noted that an area of public open space as well as an element of car parking and roads infrastructure are proposed to be located within this zone, which could be considered ancillary 'residential' in nature. Residential is open for consideration within the RU zoning 'In accordance with Council policy for residential development in

rural areas'. The applicant is requested to demonstrate that these elements of the proposal are consistent with the referenced Council policy and consider amending the proposal.

The subject proposal primarily provides the public open space within the lands zoned RU. Open space is permitted in principle on lands zoned RU and it is therefore considered that the location of the public open space is in accordance with the zoning objective. Locating the open space in the location proposed allows the RES-N lands located in the centre of the Self-Sustaining Growth town to be developed to their full potential and achieve a sustainable residential density.

As shown in the extract from the Site Layout Plan below, a very small area of roadway (hammerhead turning area) and car parking (part of 1 bay) is located outside of the RES-N zoning line and within the RU zoning area.



Extract from Site Layout Plan prepared by JFOC Architects

As noted in the request for further information, 'residential' is 'open for consideration' under RU zoning and the roadway and car parking located within the RU zoning are ancillary to the residential development provided on RES-N lands. The residential accommodation has been designed to be contained within the RES-N zoning and it is considered that the proposal is in accordance with the zoning objective for both the RES-N lands and the RU lands.

Item 2

- a) It is noted that Objective PN6 of the LAP requires the provision of a connection between the rear of St. Finian's Hall (community centre) with Newcastle Glebe in the form of an 'extended vehicular cul-de-sac'. The proposed development provides for a vehicular connection from the subject site to Newcastle Glebe as required by the objective. It is noted that the objective refers to an extended vehicular cul de sac. Vehicular permeability to the Main Street from the Glebe is provided and as such, a cul de sac arrangement is not provided. The applicant is requested to provide an extended vehicular cul de sac arrangement with the Glebe in accordance with Objective PN6 of the LAP. This is likely to require omission of vehicular connection to the Main Street.
- b) Concerns are raised in relation to the implementation of the vehicular connection to the Glebe and sufficient legal interest. The street in Newcastle Glebe appears to be Taking in Charge, however, third parties have questioned same. The applicant is required to clarify that sufficient legal interest and relevant consents are in place.
- c) Objective PN5 of the LAP states to include for a through route to the rear of Main Street and St. Finian's Hall and upgrade such as a pedestrian and cyclist green link with the Village Core via Market Square off Main Street (West). The subject application has included an indicative connection from the subject site to Market Square. Given the ambition to provide a community centre extension with pedestrian access/entrance from the north, it is considered that the connectivity sought by the objective is required. The applicant is required to demonstrate sufficient legal interest to complete the connection, provide clarity on grounds levels and provide appropriate design amendments adjacent to the connection (appropriate public realm areas at proposed car parking area).

Response to Item 2:

- a) While it is acknowledged that the Newcastle LAP (NLAP) contains an objective to provide a cul-de-sac within the application site, it is submitted that the NLAP was first implemented in 2012. While the NLAP has been extended until December 2022, many of the objectives contained within it are outdated and not in line with the most recent guidance, such as DMURS in this instance.

DMURS encourages permeability and Section 3.3 deals with Permeability and Legibility and notes that street networks should:

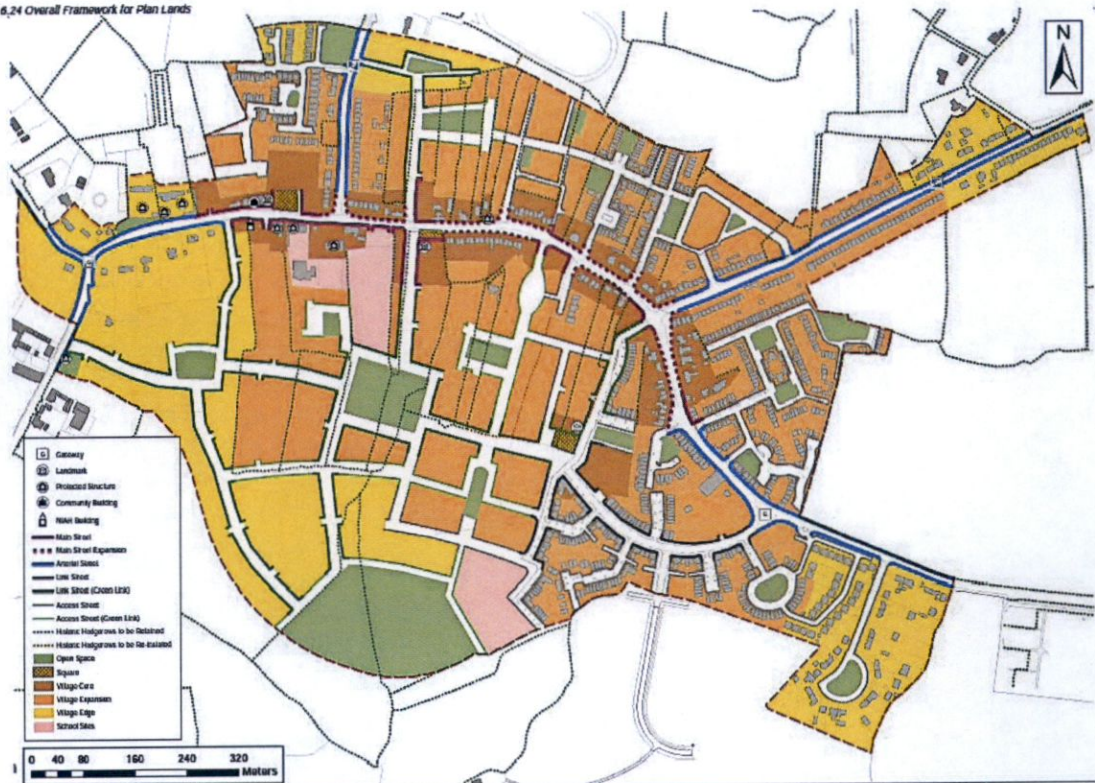
- *be based on layouts where all streets lead to other streets, limiting the use of cul-de-sacs that provide no through access.*
- *maximise the number of walkable/ cyclable routes between destinations*

Design Principle 1: To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.

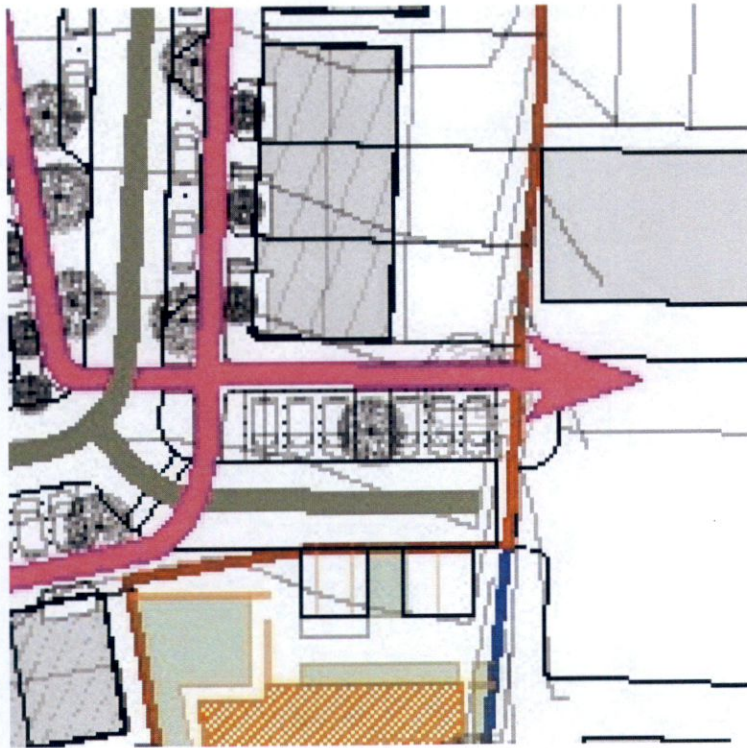
Cul-de-sac arrangements are discouraged in DMURS and therefore it is considered appropriate to retain the vehicular connection through to the Main Street as provided for in the application. The connection through to Main Street will improve permeability and access to the proposed




residential development. It is noted, in terms of accessibility, that there is a more frequent availability of permeability to the east of the arterial street on the north side of Main Street (4 accesses), there are none to the west of the arterial street as far as the Celbridge Road exit from Newcastle. Therefore, permeability is poor from lands to the west of the arterial street and access to facilities on Main Street is circuitous.

Fig 6.24 Overall Framework for Plan Lands



- b) It is submitted that the street in Newcastle Glebe is taken in charge and consent was received from SDCC. Please refer to the SDCC Taken in Charge Map and Letter of Consent submitted with planning application documents
- c) A potential future connection is indicated in the application, to the extent of the applicant's ability. Therefore, the objective has been facilitated and has not been hindered by the application. It is clear from documentation provided with the application that there is no proposal to provide a physical connection as part of this planning application, as the land required for such connection is not within the applicant's ownership. Please see extract from the Architectural Design Statement and the Site Permeability Plan prepared by JFOC and submitted with the planning application below indicating a 'potential future pedestrian link' to the east.



-  Pedestrian
-  Cycle
-  Vehicular

Item 3

It is noted that the applicant has identified a portion of land to the rear of the existing St. Finian's Community Centre to facilitate the delivery of an extension to this centre as required by Objective LUD12 of the Newcastle Local Area Plan and CS9 SLO 2 of the Development Plan. It is noted that objective LUD 12 requires the provision of the community floorspace at, or adjoining, the existing St. Finian's Community Centre and/or the payment of development contributions towards the provision of community floorspace at this location. CS9 SLO 2 states 'To facilitate and commit to the delivery of Phase 1 residential lands at Burgage North to the north of St. Finian's Community Centre which reserve suitable lands to facilitate the extension of the existing community centre'. It is noted that Objective LUD12 requires the provision of the community floorspace (or financial contribution) and the SLO requires the reserving of suitable lands to facilitate the extension to the existing community centre.

- a) In this regard and to satisfy the relevant objectives, the applicant is advised that the Planning Authority considers that the lands for the community centre should be clearly outlined on the site layout plan for transferring to the Council for the community centre.
- b) The subject site layout and lands for the future community centre extension are not considered to be suitable to facilitate the extension in accordance with the SLO. The area of land identified to the rear of the existing Newcastle Community Centre is significantly smaller than the initial site identified and would negatively impact the proposed planned extension. The applicant is requested to contact the SDCC Architect's Department and the Planning Authority regarding the above.

Response to Item 3:

- a) Refer to the enclosed updated site layout drawing no. 19.134F11003 which shows the lands that are to be transferred to the Council for the community centre
- b) We have engaged with the SDCC Architect's Department to determine the extent of the works to the Newcastle Community Centre and adjusted our proposed site layout accordingly. Refer to the enclosed updated site layout drawing no. 19.134F11003 that reflects this in line with the proposed works to the Community Centre. Refer to the enclosed Appendix B: St. Finian's Community Centre Preliminary Design SDCC for drawings received from SDCC Architect's Department.

Item 4

- a) The Design section of the Architectural Design Statement seeks to address the urban design manual requirements. It is noted that the applicant has not addressed 'Public Realm' as one of the required themes and is requested to do so.
- b) It appears that there are significant level changes in some instances. The applicant is requested to set out details of cut and fill, as well as details of any retaining structures
- c) The proposed residential dwellings are sited closer to the community centre than previously indicated in pre-planning - the applicant is requested to provide sections indicating the potential relationship between the community centre / extension and the dwellings.
- d) The developer does not appear to have considered or allowed for future pedestrian access to the rear of the community centre site i.e. from the proposed carparking to the north, which is critical to the success of the future community centre extension development (for staff access, fire escape route, service entrance etc.). This is further complicated by the following observations, which the applicant is requested to address:
 - i. The applicant is proposing to significantly reduce the existing ground levels to

- the rear of the community centre site. Contiguous Elevation View 2-2 indicates a change in level, between the FFL of the community hall and the proposed access road to the north, of 2.478M, which seems excessive, unnecessary and requires explanation. This reduction in ground level will make universal access into the community hall site very difficult to achieve.
- ii. The applicant has not provided a site section cutting through the rear of the community hall site and the proposed car parking area to the north, which will be required to review the proposed level changes
 - iii. The applicant appears to be proposing to build a retaining wall along the north boundary of the community hall site and to completely infill the north face with 'shrub planting' and trees, which will make future pedestrian access in this area difficult /impossible to achieve.
- e) Clarification is required regarding fire tender access to the north of the site.
 - f) There is little provision in terms of passive overlooking to the proposed car parking spaces to the north of the site, which may be required to deter loitering and anti-social behaviour. The applicant is requested to address this.
 - g) The applicant has indicated a pedestrian link into the Market Square site, however, the existing Market Square ground levels are not indicated and require clarification. Also, no footpath is provided, and pedestrians are required to walk through the main carriageway which is not acceptable. The applicant is requested to address this and should note that this connection is required in the LAP.
 - h) Regarding finishes to the boundary walls between the community hall site and the proposed residential development. SDCC have a preference for full brick faced boundary walls. The walls will be overlooked by the ground floor of the community hall extension and highly visible. The applicant is requested to address this.
 - i) The proposal provides for 7 different house types, 2no 2bed and 28no 3bed. 56.6% are terraces / end of terrace. 12 (40% are semi-detached) and 1 is detached. Whilst the mix is noted, it is not considered that the type proposed is 'largely terraced', in accordance with PN12. The percentage of dwellings that are terraced should increase to ensure they are the majority, with sporadic semidetached / detached dwellings. The applicant is requested to address this.

Response to Item 4:

- a) Refer to the enclosed 'Appendix A to the Architectural Design Statement – Public Realm' which addresses this.
- b) Refer to CS Consulting drawing NCA-CSC-ZZ-SI-DR-C-0021 for Cut & Fill analysis to achieve proposed finished floor levels and finished ground levels throughout the development. Based on the analysis, retaining structures are alleviated from the proposed design. The majority of cut on this site is located at the proposed detention basin.
- c) Refer to the enclosed drawing no. 19.134.FI1006 – Site Sections which includes the indicative position of the Community Centre extension based on the design received from SDCC
- d) Refer to the enclosed updated site layout drawing no. 19.134FI1003 which is amended to accommodate the extension of the Newcastle Community Centre and future pedestrian access to the Community Centre
 - i. Refer to the attached additional site sections showing the relationship between the proposed dwellings and the Newcastle Community Centre no. 19.134FIXXX in terms of existing and proposed level changes.
 - ii. Refer to the attached additional site sections showing the relationship between the proposed dwellings and the Newcastle Community Centre no. 19.134FIXXX which cuts through the rear of the Community Centre and the proposed car parking.

- iii. Refer to the revised site layout drawing no. 19.134FI1003 and the revised landscape proposals by RMDA Landscape Architects.
- e) Refer to CS Consulting drawing NCA-CSC-ZZ-SI-DR-C-0016 for swept path analyses of fire tender and refuse collection vehicle movements through the development. These illustrate that both types of vehicles can effectively access all necessary areas within the development.
- f) Refer to the enclosed updated site layout drawing no. 19.134FI1003 which addresses this concern by moving the car parking area at the north to an area which is overlooked by house no. 18-21.
- g) As shown on CS Consulting drawing NCA-CSC-ZZ-SI-DR-C-0004, a continuous footpath link is provided up to the development's eastern boundary, to the location of the proposed pedestrian access connection with the adjacent Market Square development. The footpath at this boundary location within the proposed development shall be at a level of 87.3m AOD. Based on compliance drawings submitted for the neighbouring development a level of 87.25 is indicated on the opposite side of the boundary treatment along the footpath and therefore a pedestrian link between both developments can be achieved. Refer to the enclosed drawings and documents by CS Consulting that address this.
- h) Refer to the enclosed boundary treatment plan prepared by RMDA Landscape Architects.
- i) Refer to the enclosed updated site layout drawing no. 19.134FI1003 of the revised proposal where there are 21 no. terraced dwellings out of the total proposal of 29 no. dwellings. Terraced dwellings amount to 70% of the proposed dwellings. Most dwellings proposed are terraced in accordance with PN12.

Item 5

- a) It is noted that the closest properties are No12 and No 30/29. These are approximately 17m apart. However, it is noted that the buildings are not directly opposing as the terrace (Nos 21-30) gradually moves away from the opposing dwellings as it moves further north). The distance between the central terrace and the dwellings to the west is also approximately 18m. It is noted that there are opaque windows on the rear elevations of Nos 1-5 inclusive. To the south, dwelling Nos 6 and 8 are approximately 8m apart but it is noted that there are no windows on the side elevation of No8. No 10 is approximately 18m from the side elevation of No 30 and given the location of windows, there may be potential for overlooking. No6 is approx. 16m from No 5, however it is noted that there are no side windows on No6. Overall, there are some minor concerns regarding potential overlooking, which the applicant is requested to address this
- b) It is noted that for houses 1-5, the depth of the rear garden is a maximum of 8m and that this decreases to 4m where the rear return is. The depth of the garden for Nos 6 and 7 is also 8m and Nos 16 and 20 also appear to be about 8m. The Planning Authority is concerned regarding the functionality of these private amenity areas, particularly where the area has reduced to 4m. The applicant is requested to address this.

Response to Item 5:

- a) Refer to drawings no. 19.134.FI1005 and 19.134.FI1006 which amends the overlooking issue at house no. 29 by removing the upper floor window on the side elevation.
- b) Refer to the enclosed Schedule of Accommodation which outlines the compliance with garden sizes across all houses proposed.

Item 6

NCBH20 Objective 8 states 'To ensure that all planning applications for new developments within or immediately contiguous to an ACA include an Architectural Impact Assessment and Design Rationale addressing design considerations such as urban structure and grain, density and mix, scale, height, materials, landscape, views and landmarks and historic development'. The applicant is requested to address this.

Response to Item 6:

Refer to the enclosed Architectural Impact Assessment and Design Rationale report prepared by JFOC Architects.

Item 7

1. The applicant is requested to submit a Public Lighting Design for the development.
2. The applicant is requested to submit a stage one Road Safety Audit
3. The applicant is requested to submit a revised layout of not less than 1:100 scale, showing accurate visibility splay with 2.4 meters set back, at a 1.05 metre height from ground level and 49 meters sight lines in both directions from the entrance. The visibility shall consider the public parking along the Main Street Newcastle.
4. The applicant is requested to submit a revised layout of not less than 1:100 scale, showing boundary walls at vehicle access points limited to a maximum height of 0.9m, and any boundary pillars limited to a maximum height of 1.2m, to improve forward visibility for vehicles.
5. The applicant is requested to submit a revised layout of not less than 1:200 scale detailing the permeable paving to be taking in charge, showing a concrete retaining strip between at least three parking bays or 6.0m.
6. The applicant is requested to submit a revised parking arrangement highlighting if the parking bays are to be private or public.
7. The applicant is requested to submit a traffic assessment detailing the results of analysis of the existing road network capacity, to ensure the development is under the threshold for further analysis. And an analysis detailing the junction capacity of the Newcastle Glebe/Peamount Road junction, the junction at Main Street/Peamount Road and the Junction of Athgoe Road/R405, the analysis should include any recent developments to the south of Main Street Newcastle.
8. The applicant is requested to submit a layout plan indicating a segregated cycling along the proposed link street, in accordance with the National Cycle Manual. The applicant is requested to confirm with Cycle South Dublin any connections to proposed infrastructure in the area.

Response to Item 7:

1. Refer to the enclosed public lighting proposals prepared by Sabre Electrical Services Ltd.
2. An independent Stage 1/2 Road Safety Audit (RSA) of the proposed development layout has been conducted by Roadplan Consulting, on behalf of CS Consulting. The Roadplan RSA report is provided as an appendix to the Traffic and Transport Assessment report submitted separately as part of a response to this Request for Additional Information. Design changes made in response to recommendations raised in the RSA are identified on CS Consulting drawing NCA-CSC-ZZ-SI-DR-C-0016 and NCA-CSC-ZZ-SI-DR-C-0017.
3. Refer to CS Consulting drawing NCA-CSC-ZZ-SI-DR-C-0019 for details of unobstructed sightlines at the proposed development's access on Main Street. An unobstructed visibility splay of 49m in either direction is achieved, from a setback of 2.4m from the public road edge, in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS). These sightlines are not obstructed by the existing recessed public parking spaces present on Main Street, to the east

- of the access junction.
4. Refer to the attached revised boundary treatment plan prepared by RMDA Landscape Architects which addresses this.
 5. Refer to the enclosed drawings prepared by CS Consulting Engineers
 6. Refer to the enclosed drawings no. 19.134.FI1003 Taking In Charge, and 19.134.FI1004 Parking Allocation.
 7. The accompanying Traffic and Transport Assessment report provides a detailed assessment of the proposed development's vehicular trip generation and distribution, as well as operational analysis of the 3no. requested junctions under both Do-Nothing and Do-Something scenarios.
 8. Refer to the enclosed updated site layout drawing no. 19.134FI1002 by JFOC Architects which shows a segregated cycle lane along the proposed link street. Refer to CS Consulting drawing NCA-CSC-ZZ-SI-DR-C-0004 for details of the proposed development's internal layout, including bicycle facilities. Raised off-road cycle tracks are provided through the development, between Main Street and Newcastle Glebe, in accordance with LAP objectives. The proposed arrangement takes on board the recommendations of the independent road safety audit carried out for the scheme.

Item 8

- a) Arboricultural Impact of the Proposed Development
 - i. The extent of the proposed tree and hedgerows removals - 68 % of trees (32 of 47 No.) and 110m of hedgerow including those following field and townland boundaries is not acceptable. The applicant is requested to re-design the proposed development to locate development away from existing hedgerows and significant stands of trees and or integrate this proposed development into the existing trees and hedgerows on site more sensitively ensuring that the majority of the existing vegetation on site is retained and protected. Every effort should be made to retain existing trees and hedgerows where possible as this network of existing trees and woodlands provides corridors for biodiversity and habitats for existing flora and fauna.
 - ii. The applicant is requested to provide revised proposals to include an updated Arboricultural Impact Report and Plan, Tree Protection Plan and Arboricultural Method Statement.
- b) Impacts on bat commuting and foraging routes and roosts: Green infrastructure used for commuting and foraging bats and trees with potential bat roosts identified in the Faith Wilson Bat Survey Report, May 22 are proposed for removal. There is a lack of integrated design – the landscape proposals do not integrate the recommendations of the Bat Report. The applicant is requested to amend the proposal.
- c) Ecological Impacts: There is a lack of integrated design – the landscape proposals do not integrate the recommendations of the Ecological Impact Assessment

Response to Item 8:

Refer to the enclosed updated drawings and documents by RMDA Landscape Architects and Arborist Associates which addresses these concerns.

Item 9

The applicant is advised that all planning applications shall demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application submission, having regard to the following:

- i. In the case of small-scale developments this may consist of a simple landscape plan which includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone
- ii. Where the development site is located within or close to a Core or Corridor the development should, at a minimum, protect any existing GI assets and enhance same (for example, not breaking a GI Corridor but enhancing same with a connecting piece of planting, retaining hedgerows or woodlands)
- iii. The characteristics and assets of the proximate GI Core, Corridor or Stepping Stone should be reflected within proposed development, for example continuation of hedgerows, tree planting, waterways
- iv. Development should seek to enhance or restore features that act as ecological corridors, particularly water features, hedgerows, tree lines, areas of un-cultivated land. These, or some element of them, should be incorporated into the proposed development to create pathways for wildlife and / or increase amenity value
- v. Development sites which are not located proximate to designated GI Cores or Corridors should identify the nearest designated GI Core, Corridor or Stepping Stone and make provision for GI interventions on the site which could eventually provide a link to local Stepping Stones, Cores or Corridors;
- vi. Developers should be aware that ecological corridors can also act to quickly spread non-native invasive species. Therefore, identification and control of invasive species site should be included in planning applications and the GI Plan.
- vii. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County
- viii. Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County
- ix. Site survey and analysis, identifying existing GI Infrastructure and key assets within the site
- x. Indicate how the development proposals link to and enhance the wider GI Network of the County
- xi. Proposed GI protection, enhancement, and restoration proposals as part of the landscape plan, where appropriate, for the site
- xii. Proposals for identification and control of invasive species.

Response to Item 9:

Refer to the enclosed report and drawings prepared by RMDA Landscape architects that address this.

Item 10

The applicant shall provide details of the Green Space Factor associated with the proposed development and calculated in accordance with GI5 Objective 4 of South Dublin County Council 2022-2028

Response to Item 10:

Refer to the enclosed report and drawings prepared by RMDA Landscape architects that address this.

Item 11

SuDS have four pillars: attenuation, water quality treatment, amenity, and biodiversity. The proposals are lacking in source control such as further bioretention, SuDS street trees, swales, channel rills that can be used for multifunctional benefit including attenuation. There are only three SuDS tree pits and one small bioretention area. Street trees should be provided, and they should all have bioretention SuDS tree pits that attenuate water.

The proposed attenuation basin and primary swale requires the removal of existing townland boundary hedgerow and trees earmarked for retention in Newcastle LAP (Peamount Neighbourhood). These are important routes for foraging and commuting bats. The existing ditch identified in the ecological report should be investigated for use in sustainable drainage measures, as required by the Newcastle Local Area Plan.

- i. A SuDS proposal that complies with SDCC SuDS Explanatory Design and Evaluation Guide, the Newcastle LAP and SDCC County Development Plan 2022-2028.
- ii. The SuDS proposals should be a collaboration between landscape architect and the drainage engineer to integrate the SuDS into the landscape design proposals providing amenity, biodiversity, water quality treatment as well as quality and attenuation.
- iii. The proposals shall include existing and proposed flows and comply with objective GI15: Objective GI 15 That existing natural swales, ditches, and hedges shall be retained to form an integral part of the overall SUDS network.
- iv. Details on how each SuDS component function as part of the overall treatment train.
- v. Swales should be used for attenuation not just for conveyance of overland flow.
- vi. A comprehensive SUDS Management Plan shall be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation.
- vii. Additional natural SUDS features shall be incorporated into the proposed drainage system for the development such as SuDS Street Tree Pits, further swales, rain gardens, detention basins, filter drains, etc.
- viii. Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage and landscape design for the proposed development.
- ix. Provide detail of the SuDS systems that show how they work.

The applicant is recommended to contact the Public Realm and Water and Drainage Department to discuss.

Response to Item 11:

- i. Please refer to CS Consulting drawings NCA-CSC-ZZ-SI-DR-C-0002 Drainage Layout and NCA-CSC-ZZ-SI-DR-C-0012 SuDS and Contributing Areas which have been updated as per discussions with SDCC and Landscape Architect. The SuDS proposal fully complies with SDCC SUDS Explanatory Design and Evaluation Guide, the Newcastle LAP and SDCC County

Development Plan 2022-2028

Item 12

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 a fully detailed landscape plan with full works specification and a fully detailed planting plan that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include:

- i. Full works specification, that accords with the specifications and requirements of the Council's Public Realm Section.
- ii. Hard and soft landscape details including levels, sections and elevations, detailed design of SUDs features including swales and integrated tree pits.
- iii. Play area(s) designed around the principles of natural and nature-based solutions, to provide informal, impromptu, and spontaneous play opportunities combined with play equipment that provides appropriate challenges for multiple age groups.
- iv. Details of boundary treatments
- v. Planting and hardscape details for public open space to be detailed and agreed
- vi. Street Trees shall be planted in public open space with suitable tree pits that incorporates SuDS features.
- vii. Details of tree planting pits to include SUDS features in urban trees pits and use of urban tree soils.
- viii. On-street car parking shall be combined with regular tree planting and a high standard of kerbing and paving compliant with DMURS (2019). Street trees to be provided every 2 parallel or 5 perpendicular car park spaces to reduce the hard urban impact of the proposed development; as traffic calming; for biodiversity; green infrastructure; air quality and sustainable water management.
- ix. Detailed design of all other SUDs features such as swales, permeable paving, green roofs etc.
- x. Details of Public Lighting and other underground services shall also be included on the landscape drawing to ensure that proposals are realistic, and planting is not precluded by the location of underground services and lighting and to ensure there is no conflict dark corridors for commuting bats.
- xi. A revised open space layout shall be provided which includes proposals for informal kickabout areas.
- xii. A plan which clearly delineates public, communal, and private spaces to be provided, as well as a detailed breakdown of the total area of same. A minimum of 0.0681ha of open space should be indicated.
- xiii. Proposed pedestrian connections to adjoining lands should be clearly indicated on plans.

The applicant should show how public open spaces in the wider area will link in and integrate with the proposed development. The public realm should be integrated into the adjacent development areas, creating continuous green infrastructure connections that form both physical and biodiversity links. Access off main street is to be pedestrian/cycle and this area to be designed to create significant threshold area that could be considered as Public Open Space.

Response to Item 12:

Refer to the enclosed report and drawings prepared by RMDA Landscape architects that address this.

Item 13

There are no play proposals: The applicant is requested to provide the following information with respect to play:

- i. Clarification shall be provided as to the total number and location of play opportunities, the age range they are appropriate for and whether they are universally accessible. An emphasis shall be on active, accessible play throughout the development.
- ii. Fully detailed play proposals including universally accessible equipment. All play equipment shall be of predominantly natural materials with unstructured play included in the proposed design.
- iii. The applicant shall consider the use of engineered woodchip as playground surfacing material.

Response to Item 13:

Refer to the enclosed report and drawings prepared by RMDA Landscape architects that address this.

Item 14

1. Water services estimate that proposed attenuation of 580m³ is undersized by approximately 8%. It is unclear how much attenuation is provided by tree pits, biodiversity areas and swales for proposed development.
 - i. The applicant is requested to submit a drawing and report to clearly show all surface water attenuation provide in m³. Show how much surface water attenuation is provide by all SuDS (Sustainable Drainage System) such as biodiversity, tree pits, Swales and all other SuDS systems in proposed development.
2. The applicant is requested to re-examine surface water discharge /outfall location, such that it does not discharge at actual pond at Glebe house. Confirm ownership of lands where surface water network discharge pipe is located, to allow determination of need for a wayleave for South Dublin County Council.
3. The proposed gradients of surface water network are very steep at 1:30. The applicant is requested to review the gradients proposed Surface Water Sewers.
4. The applicant is requested to include additional SuDS to attenuate surface water and examine how underground attenuation systems can be replaced with overground SuDS attenuation systems.
5. Prior to submission of additional information, the applicant is requested to contact Water Services (SDCC - South Dublin County Council) and Public Realm (SDCC) to discuss revised surface water and SuDS submission.

Response to Item 14:

1. Please refer to CS Consulting drawings NCA-CSC-ZZ-SI-DR-C-0002 Drainage Layout and NCA-CSC-ZZ-SI-DR-C-0012 SuDS and Contributing Areas which provides the attenuation storage volume information for the swales, bioretention and permeable paving. Total attenuation storage provided through the site is 620m³.
2. Please see drawing NCA-CSC-ZZ-SI-DR-C-0002 Drainage Layout which highlights that the stormwater does not discharge to the pond at Glebe house but instead a ditch adjacent to the pond. This ditch then subsequently discharges to another ditch further north. It should be noted that the pond outfalls to the same ditch.
3. Stormwater sewer gradients have been reviewed but given the site constraints the storm water pipe gradients are required to have steep falls. It is worth noting that the illustrated stormwater pipe gradients are in line with the GSDSDS guidance documentation.
4. Please refer to CS Consulting drawings NCA-CSC-ZZ-SI-DR-C-0002 Drainage Layout and NCA-CSC-ZZ-SI-DR-C-0012 SuDS and Contributing Areas which have been updated as per discussions with SDCC and Landscape Architect. The proposed development site layout has incorporated SuDS elements within the design where feasible based on-site constraints.
5. Brian Harkin from SDCC and the applicant had a meeting on 12th October 2022 coming to an agreement in principle on all drainage related items.

Item 15

The gradients of foul water sewers/drains are steep at gradients of 1:30 and 1:48 and do not comply with Irish Water Standards. The applicant is requested to obtain a confirmation of Feasibility Letter from Irish Water for Proposed Development.

Response to Item 15:

Foul water sewer gradients have been reviewed but given the site constraints the foul water pipe gradients are required to have steep falls. It is worth noting that the illustrated foul water pipe gradients are in line with the Irish Water Wastewater Code of Practice. The applicant has obtained a confirmation of feasibility letter from Irish Water dated 9th November 2021.

Item 16

1. The applicant is required to engage the services of a suitably qualified Archaeologist to carry out an Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Geophysical Survey and Archaeological Test Excavation to respond to this request for Further Information. No sub-surface work shall be undertaken in the absence of the archaeologist without his/her express consent.
2. The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site (consulting appropriate documentary sources) and review all cartographic sources and aerial photographs for the area.
3. The Archaeological Geophysical Survey must be carried out under licence from the National Monuments Service and in accordance with an approved method statement; note a period of 2-3 weeks should be allowed to facilitate processing and approval of the licence application and method statement.
4. The Archaeological Test Excavation must be carried out under licence from the National Monuments Service and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application

and method statement.

5. Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings and the results of the Archaeological Geophysical Survey. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from the Department. Please note that all features/archaeological surfaces within the test trenches are to be hand cleaned and clearly visible for photographic purposes.
6. Having completed the work, the archaeologist shall submit a written report to the Department and the Local Authority describing the findings of the AIA including the results of the geophysical survey and test excavations. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.
7. Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate. This Department will advise the Local Authority with regard to these matters. No decision should be made on this application until this Department and the Local Authority have had the opportunity to fully evaluate the findings of the AIA.

Response to Item 16:

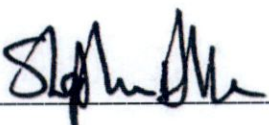
An Archaeological Impact Assessment is in the process of being prepared by ICON Archaeology. Licences from the National Monuments Service is being processed for approval. Refer to the enclosed correspondence from the National Monuments Service for evidence of this.

Summary and Conclusion

Additional information was requested by decision dated the 23rd August 2022 for a proposed residential development at Main Street, Newcastle Co. Dublin. In addressing this request, the Applicant has engaged with the Planning Department of South Dublin County Council.

It is respectfully submitted that the concerns of the County Council have been comprehensively addressed. We trust you have sufficient information to determine this application for planning permission. Do not hesitate to get in contact should you have any queries on the above. We look forward to your decision in due course.

Yours Sincerely,



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