

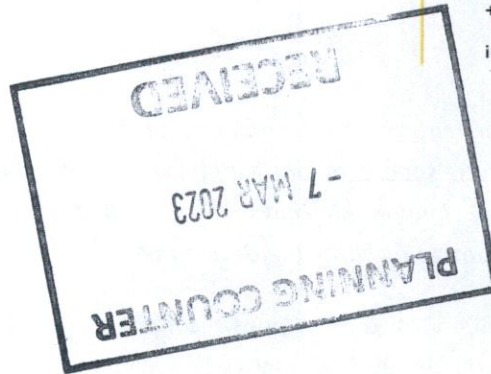
# DOWNEY

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7<sup>th</sup> March 2023.

**RE: Request for Additional Information, planning permission sought for residential development at the site of 0.57ha at Muldowney's Pub, Main Street, Rathcoole, Co. Dublin.**

**Planning Reg. Ref: SD22A/0096**

Dear Sir/Madam,

Please find enclosed a response to South Dublin County Council's request for additional information in relation to an application lodged under Reg. Ref. SD22A/0096 for planning permission for the provision of 23 residential units at Muldowney's Pub, Main Street, Rathcoole, Co. Dublin. The proposed development, as per the description contained within the statutory planning notice, provided for:

*"The residential development will consist of: (a) the demolition of some of the existing structures on site to include: a portion of an existing rubble wall; the rear extension of an existing cottage; existing structures, storerooms and sheds to the west and north of Muldowney's Pub. (b) the reconfiguration, renovation, and extension of the existing cottages on site to provide for 2 no. 2-bedroom units. (c) The reconfiguration and renovation of Muldowney's Pub and storage yard (d) The construction of 21 residential units within 2 no, 3-storey blocks to the rear and side of Muldowney's Pub as follows: Block A will provide 6 no. 1 bedroom units, giving a total of 6 no. apartments in this building. Block B will provide for a mix of 3 no. 1 bedroom and 12 no. 2 bedroom units, giving a total of 15 units within this Block.*

*Private open space will be provided in the form of balconies with communal open space provided in the centre of the site. The development will also include the provision of a pedestrian access from Main Street and a pedestrian and vehicular access via the existing*

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*car-park entrance to the rear of Muldowney's Pub. Provision of 32 carparking spaces and 44 bicycle spaces, all ancillary hard and soft landscaping, boundary treatment, ESB sub-station, signage, bin and bike stores and all engineering and site development works necessary to facilitate the development."*

The preparation of this response commenced following the Council's request for additional information on the 30<sup>th</sup> of May 2022 (deadline for response extended under Article 33(3) of the Planning and Development Regulations 2001 (as amended), to the 8<sup>th</sup> of March 2023).

DOWNEY have reviewed the proposals as submitted to the Council and the documentation in support of this additional information request and compiled this response. **We wish to highlight that the proposed development has been altered, which may be considered material and require further publication of the statutory notices.**

Please note that this additional information response document should be read in conjunction with all drawings, plans and documentation submitted by the design team in response to the Additional Information request.

The items contained within the Additional Information request are addressed below: -

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## 1.0 Additional Information Request No. 1

*"Traffic and Transport: The applicant is requested to submit a detailed Traffic and Transport Assessment (TTA) for the proposed development. The TTA should address a) any traffic and parking issues in respect to school drop-off/collection and masses and funerals at the church. The TTA should assume the delivery of the permitted school (SD21A/0231). b) the location and details of car parking for patrons of Muldowneys Pub (which should not be the same parking to be used for occupants or the proposed apartments)."*

### 1.1 Applicant's Response No. 1

The applicant has instructed NRB Consulting Engineers to prepare a detailed Traffic and Transport Assessment for the proposed development in response to the request by South Dublin County Council. Please find enclosed the TTA report and associated documentation. The TTA has addressed any traffic and parking issues in respect to school drop offs (including for the assumption of the delivery of the

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permitted school under SD21A/0231) and the masses & funerals at the church, and further information can be sought in the enclosed Traffic and Transport Assessment Report.

The revised development will still provide for 32 car parking spaces, these have been reconfigured to provide 15 allocated spaces for Muldowney's pub and its patrons, and 17 spaces are allocated for residents, including a disabled parking spot.

There is a total provision of 68 no. bicycle spaces provided on the site, with 24 no. bicycle spaces are located on the east boundary of the site opposite of the car parking area, and no. 44 bicycle storage spots are in a dedicated store area located adjacent to the developments central communal space.

It is important to note that this is a brownfield site in the centre of Rathcoole, the area proposed for re-development is currently occupied by an underutilised private, surface car-park. The car-park is currently for the use of the patrons of the Pub only. This car-park is not a public one and is solely for the use of the Pub patrons.

The current proposal will provide for a total of 32 car-parking spaces in line with development Plan standards. As outlined above, these spaces will be allocated for the commercial and residential use only. This area is not nor has ever been authorised for use by members of the public.

As outlined in the TTA given the fact that the car-parking proposal is minimal, no impact on the current road network is anticipated.

The TTA concluded with the following:

*"This report demonstrates that the proposed Development will have an absolutely negligible impact upon the established local traffic conditions and can easily be accommodated on the road network without any capacity concerns arising."*

Please refer to the TTA prepared by NRB Consulting Engineers and provided under separate cover for further details.

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## 2.0 Additional Information Request No. 2

**Residential Density:** *"The applicant should consider and address how the provision of residential development at this density in the village of Rathcoole accords with the regional*

and local settlement strategy, with special reference to the results of the Transport and Traffic Assessment.”

## 2.1 Applicants Response No. 2

The proposed design of the apartment block has been altered by DOWNEY through architectural design modification, in which a two-to-three storey singular L-block design approach has been taken to ensure that the building does not dominate the existing streetscape, particularly in regard to the single storey cottages. The design has had regard to the *Urban Design Manual – A Best Practice Guide (2009)* explored further within the design statement which forms a key component in the design and planning process.

Within the Chief Executive Report, the following is stated in regard to density:

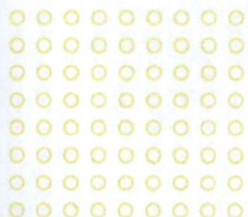
*“The portion of the site which will contain the residential blocks, residential parking, and the open space most clearly associated with that residential development, is the western half of the site. The eastern half contains the pub car park, the pub, and an area of open space which is detached from both the residential development and the pub, and shares a boundary with the lane to the rear (it is possible that the rear of the site could be redeveloped as an independent residential site with rear access). Excluding the eastern half of the site, the residential area measures approx. 0.26 Ha. or slightly less than half of the overall site area. The provision of 23 units on a 0.25 Ha. site gives a net residential density of approx. 90 dwellings per ha”.*

The scheme is made up of 23 units, in which the gross residential density on the site calculates as 40 units per hectare (23 units / 0.57 ha). However, this calculation does not take into consideration there is a commercial aspect of development occurring on the overall site area.

According to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) the following is stated in calculating the net density of a residential development within Appendix A:

*“A net site density measure is a more refined estimate than a gross site density measure and includes only those areas which will be developed for housing and directly associated uses. These will include:*

- access roads within the site;
- private garden space;



- *car parking areas;*
- *incidental open space and landscaping; and*
- *children’s play areas where these are to be provided.”*

Therefore, in order to calculate the net residential density of the proposed residential scheme, the proposed commercial pub area, associated pub car parking area and facilities are removed from the site area in the calculations for the net density. The total site area dedicated to the commercial pub is 764.8 sq. m (592 sq. m commercial pub structure and facilities, and 172.8 sq. m of parking space). This leaves a site area of 0.49 hectares.

This totals to a proposed net residential density of 47 units per hectare.

In which the location is set within a village centre, mid-to-high density ranges of 50 units per hectare would be expected in line with national policy guidance and referenced within the *South Dublin County Development Plan 2022 – 2028 Appendix 10: Building Height and Density Guide 2022*.

*“For the purposes of relevance to the predominant forms of development to which the contextual analysis process will apply, the illustrative examples concentrate on locations where **mid-to-high density and higher density ranges of 50 units per hectare would be expected in line with national guidance**. The selected indicative locations are: • I. District Centre; • II. **Village Centre**; • III. Town Centre; • IV: Suburban Infill (Medium); • V. Suburban Infill (Small); • VI. Local Centre; • VII: District Centre.” [South Dublin Development Plan 2022 – 2028: Appendix 10: Building Height and Density Guide 2022 pp. 43]*

Within the South Dublin County Development Plan 2022 – 2028, Rathcoole is classified as a ‘*Self-Sustaining Growth Town*’ within the local settlement strategy. There is no reference to the type of settlement hierarchy that Rathcoole falls under on a regional policy level within the RSES Settlement Hierarchy, so South Dublin County Council assigned the hierarchy category of ‘*Self-Sustaining Growth Town*’ to Rathcoole within the recently implemented South Dublin County Development Plan 2022 – 2028.

As Rathcoole is now classified as a ‘*Self-Sustaining Growth Town*’, the description of these within the RSES settlement hierarchy are described as ‘*Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining*’. This has led to a series of policies and objectives to guide the future development of Rathcoole as a self-sustaining growth town that is projected to have a population increase of 2,058 persons by 2028:



Year/Settlement Area	2016 Census Population	Population Growth	2028 Projected Population
Citywest/Fortunestown	8,238	7,662	15,900
Saggart	3,133	398	3,531
Newcastle	3,093	1,946	5,039
Rathcoole	4,351	2,058	6,409

Figure 1: Extract from South Dublin Development Plan 2022 - 2028 showcasing population growth of Rathcoole.

**Policy CS3: Settlement Strategy – Strategic Planning Principles outlines within Objective 3:** *To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).*

**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.*

**Policy CS10 Rathcoole:** *Support the sustainable long-term growth of Rathcoole by focusing development growth along the main street based on local demand and the ability of local services to cater for sustainable growth levels.*

**CS10 Objective 1:** *To facilitate the commencement and completion of development on zoned residential lands within and contiguous to the settlement boundary of Rathcoole which recognises natural heritage assets and facilitates connections to the village core and other areas to provide for active travel opportunities.*

**CS10 Objective 2:** *To support well-designed infill development along the main street and core village area of Rathcoole.*

The proposed development would therefore be in accordance with accommodating the growth of Rathcoole as a self-sustaining growth town with a modest design consisting of an overall addition of 23 units that are both individual and family friendly. This would be an appropriate density for a 'central and/or accessible location' as per the government's most recent density guidance, contained in 'Sustainable Urban Housing: Design Standards for New Apartments' (2022).



Section 2.7.2 states the following in regard to Self-Sustaining Growth Towns:

*“Rathcoole has limited public transport provision and social services to date. Some improvements will be made as BusConnects brings improved services and overall accessibility to Celbridge, Dublin City Centre, Grangecastle, Hazelhatch train station and Saggart Luas Stop. It is important that Rathcoole develops at an incremental pace, based on the delivery of social, physical and transport infrastructure and services. The capacity of zoned lands is considered to be sufficient to meet long term demand for the settlement.”*

DOWNEY submit that as Rathcoole is classified as a ‘self-sustaining growth town’ in the recently adopted Development Plan, it is established that Rathcoole has the potential capacity to further accommodate new residential development and improve on its established transport links and it was identified within the NRB Traffic and Transport Assessment that the proposed residential development of 23 units would not have an adverse impact on the traffic patterns of the area. We therefore are of the professional opinion that the area can absorb the proposed development and not be contrary to the proper planning and sustainable development of Rathcoole taking into consideration the regional and local settlement strategy and is zoned to accommodate for further residential development.

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### 3.0 Additional Information Request No. 3

**Architectural Character:** The applicant is invited to respond to the following items identified and set out by the SDCC Architectural Conservation Officer:

- A)
- (i) *“The southern block (Block A) is linked to the existing cottages to create two L-shaped plan block arrangements around two inner squares which form an urban edge to the western open space and church. It is felt at this area that some separation distance is required to the rear of the corner single-storey cottage allowing a variation of heights and sufficient setback. It is considered that having the 3-storey block directly onto the rear of the corner cottage allows the block to be imposing and completely dominate the single-storey cottages.*
  - (ii) *Differing heights and some separation to delineate the Main Street buildings from the rear block onto the Church site is required to minimise the visual impact. It is noted that the height of Block A is in line with the height of the existing church, however the block form of the proposed residential units is larger in mass and scale thereby creating more visual impact. The existing Church building although located setback off*

*Main Street still provides architectural interest and character within the village setting.*

- (iii) The new development at this location needs to provide a greater level of architectural interest and character. The proposed blocks need to achieve a backdrop of add architectural quality and interest to the rear of the existing single-storey cottages and existing public house.*

**B)**

- (i) It is considered that more consideration needs to be given to the materials and finishes in order to address the above. The height of the blocks needs to show different and varying levels and setback to reflect the different building heights, roof levels/types and architectural character and materials of the existing building stock along Main Street and the village core.*

- (ii) Block A should be re-designed to ensure the street frontage element is delivered along with achieved visual connection to Main Street at this location, therefore the design should provide variations in height, levels and roof profiles to reflect a typical streetscape which provides visual interest and variety in design/styles.*

- (iii) Block B requires re-design/revisions to once again provide an overall design that will provide architectural interest as a backdrop to Main Street. Some reduction in height and set back will support a varied design. The use of colour and perhaps different materials would also assist in providing architectural merit and quality defining the architectural quality required within the Village, as part of creating new design and architectural character within the Architectural Conservation Area.*

- C) A Method Statement and Schedule of Works should be provided detailing conservation repair and upgrading of the existing single-storey cottages to ensure the external appearance and retention of original materials are delivered."**

### **3.1 Applicants Response No. 3**

The applicant has retained DOWNEY to respond to the items raised in request no 3 with respect to the design of the proposed scheme. Please refer to their architectural drawings and associated documentation pack enclosed with this response for further details. This pack includes an architectural heritage impact assessment report outlining the method statement for the upgrading of the cottages.

The Design Statement illustrates the evolution of the design from its inception to the additional information stage. It has taken into cognization the recommendations suggested by South Dublin County Council in the further improvements of the design within multiple additional information requests, addressing the overall design of the proposed development. Please refer to the design





statement and updated CGIs of the proposed development for further details in the evolution of the proposed design since the initial planning application.

As shown in the figures below, the proposal has undergone some changes in response to the additional information request. Consideration was given to comments on own-door access, variance in height and commercial use on the ground floor. It was considered to current proposal is more appropriate in the context of the site.

The current proposal replaces the previous two apartment blocks with one, the height remains at 3 storey but it has been set-back from the cottages and main street as a result of the re-design. This provides a more sympathetic approach to the ACA. Own-door units have been provided on the ground floor opening into the communal open space. This provides controlled access to these units. Buffer planting have been provided throughout the scheme to ensure privacy for the end-users. The communal open space remains centralised within the scheme with controlled access to ensure privacy and security for the residents. Pedestrian access from Main Street will be controlled through the use of a key fob for residents only.

The commercial element is now totally separate from the residential use, bike and bin stores are clearly delineated, as are car-parking spaces and access points. The windows and door from the Public House opening onto the communal open space have been relocated.



*Figure 2: Extract of CGI of initial design proposed.*



Figure 3: Extract of CGI proposed development with proposed AI stage changes, demonstrating a reduction in the bulk of the design, as well as more appropriate material choices being made.

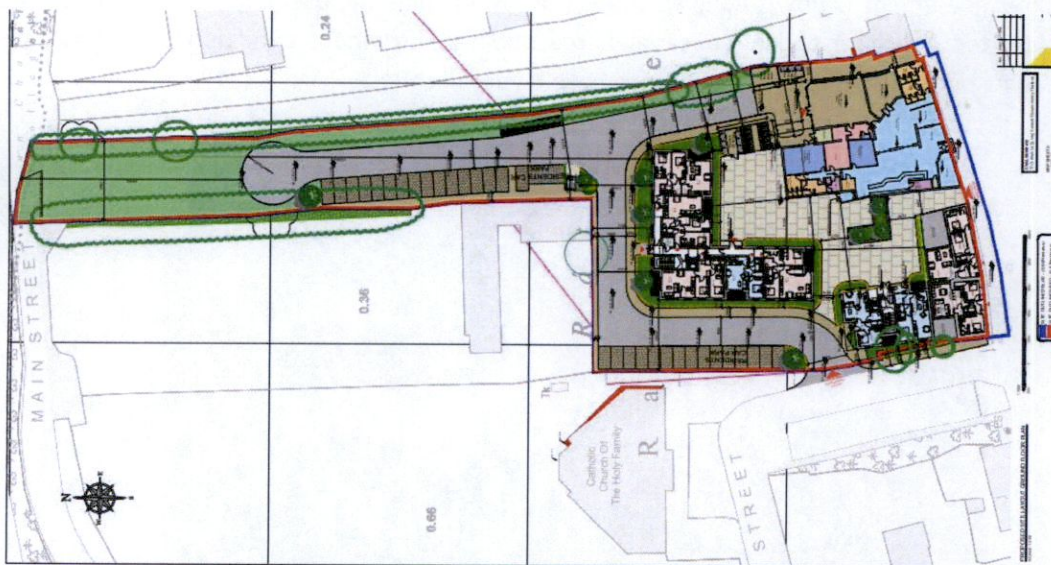
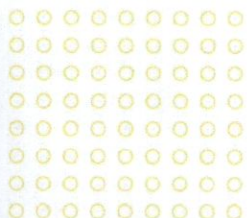


Figure 4: Extract of Initial Proposed Ground Site Layout Plan



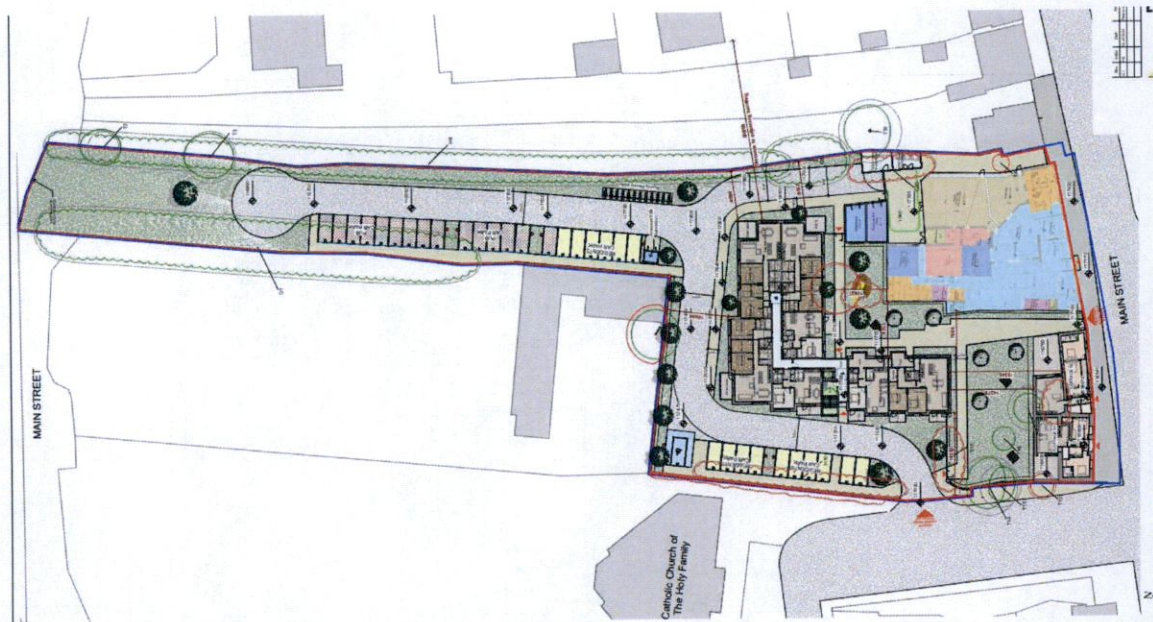


Figure 5: Extract of Ground Site Layout proposed for the AI stage.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site and its surrounding landscape, and it is therefore considered that the proposed development represents a high-quality design whilst optimising the appropriate use of the site. Due consideration has been given to the surrounding existing structures within the immediate environs of the site, particularly in regard to the material choices that are present within the Rathcoole Village ACA. The proposed development is respectful of the established character of the area in terms of heights, materials, finishes, etc., and is of a form and density that is compatible with the surrounding area. Please refer to the plans, sections and elevation drawings prepared by DOWNEY for further details on the design of the proposed development.

The proposed development has had cognisance with Section 3.6 of the South Dublin Development Plan, which states *"New buildings proposed within historic core areas of villages / towns and Architectural Conservation Areas, should not necessarily replicate existing buildings in design, appearance or materials."* The Design Statement provides a rationale to the design and material choices that were made for the proposed development and can be referred to for further details.

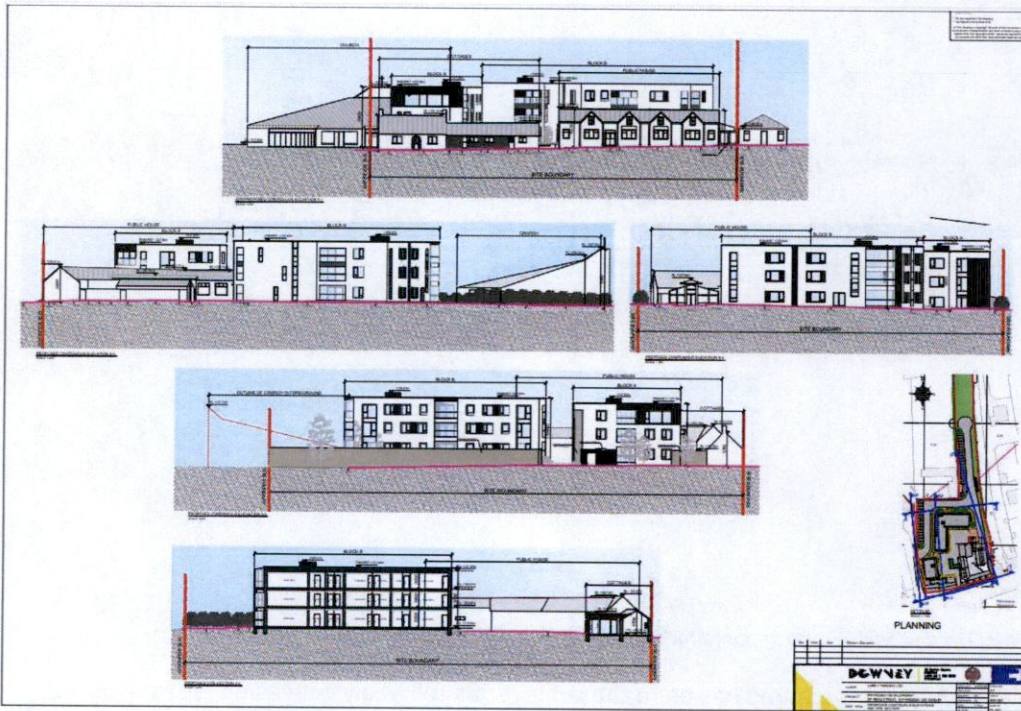


Figure 6: Extract of initial proposed development contiguous elevations of apartment blocks

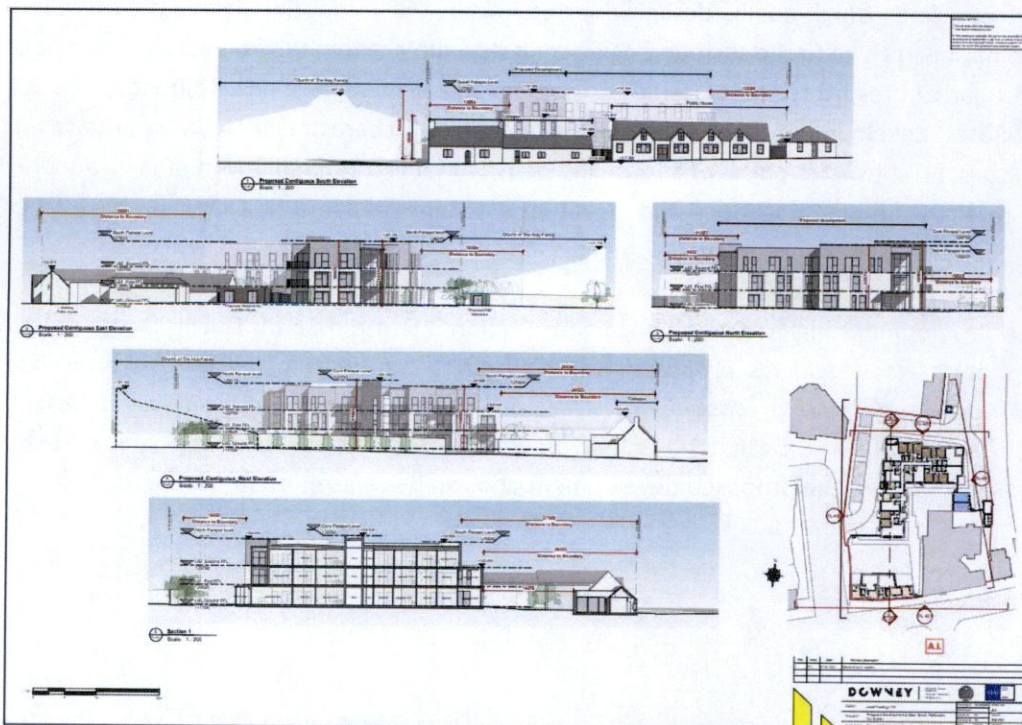


Figure 7: Extract of amended proposed development contiguous elevations at AI Stage.



A Method Statement and Schedule of Works have been provided by DOWNEY; which provide for the details of the proposed works for the cottages and how original materials are to be recycled in the case of demolition for the construction phase. Please refer to these documents for further information regarding the external appearance and the re-use of original materials.

DOWNEY submit that the revised design of the proposed development was made in regard to the set-out policies, objectives and guidelines within the *Apartment Guidelines 2022, South Dublin County Development Plan 2022 – 2028* and relevant ministerial guidelines for development. We are of the professional opinion that the proposed amendment to the design is more appropriate for the surrounding context of the subject lands and is a further improvement from the design that was initially proposed. The proposed development is in accordance with the proper planning and sustainable development of Rathcoole.

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#### 4.0 Additional Information Request No. 4

##### Courtyard:

- A) *"In terms of amenity and privacy, there are a few issues with the courtyard space.*
- (i) *As it is located adjacent to a public house, the open access to the courtyard from Main Street is problematic and may present a challenge to the residential amenity and enjoyment of the semi-private space for residents.*
  - (ii) *The provision of open accesses to the south and west also potentially provides a through-route for people walking to and from church or school. This also may compromise the ability of residents to enjoy the space.*
  - (iii) *The emergency access from the public house is a major risk, as the enjoyment of the space is dependent on the management of the pub adhering strictly to the conditions of any planning permission. Furthermore, the doorway would likely need to become a party boundary between the public house and the lands owned by an Owner's Management Company set up under the Multi-Unit Developments Act 2011. It is not clear that this would be a secure boundary and this may raise issues with obtaining insurance.*
  - (iv) *pub toilet windows fronting onto the courtyard space, allowing for noise and odours to filter into the courtyard, and additionally to detract from the sense of privacy or enclosure offered by the courtyard. It is noted that, at present, the minimum private open space is provided for each apartment unit (excluding cottages) as per the Apartment Guidelines. It should be possible to compensate for lack of quality communal space by providing the required communal space within private balconies*

and terraces (i.e. doubling them in size). The applicant is therefore asked to reconsider these aspects of the development layout, to clarify the purpose of the courtyard and to illustrate either that it is a communal amenity space with adequate privacy and amenity value, or otherwise that the lack of such dedicated community space can be made up for with more generous provision of private balconies and terraces, or alternative communal open space provision. This should be dealt with by additional information.

(B) The Acoustic Design Report notes that balconies on the top floor of the east façade of Block A, and on the southeast façade of Block B, will exceed desirable noise levels, but that this is offset by the desirable noise levels in the communal open space. The applicant should address therefore the noise levels on these balconies if measures to further secure privacy in the communal open space are not proposed to be implemented (as per above comments on layout)."

#### 4.1 Applicants Response to No. 4.

DOWNEY have carried out revisions to the overall proposed residential scheme, which has led to alterations to the proposed courtyard space and clearer boundary treatments. This has changed the courtyard context in regard to access points, the location and size of the proposed courtyard, the emergency access point of Muldowney's and the public toilet window. These can be viewed in further detail within the submitted revised drawings and design statement outlining justifications for the proposed changes in the design.

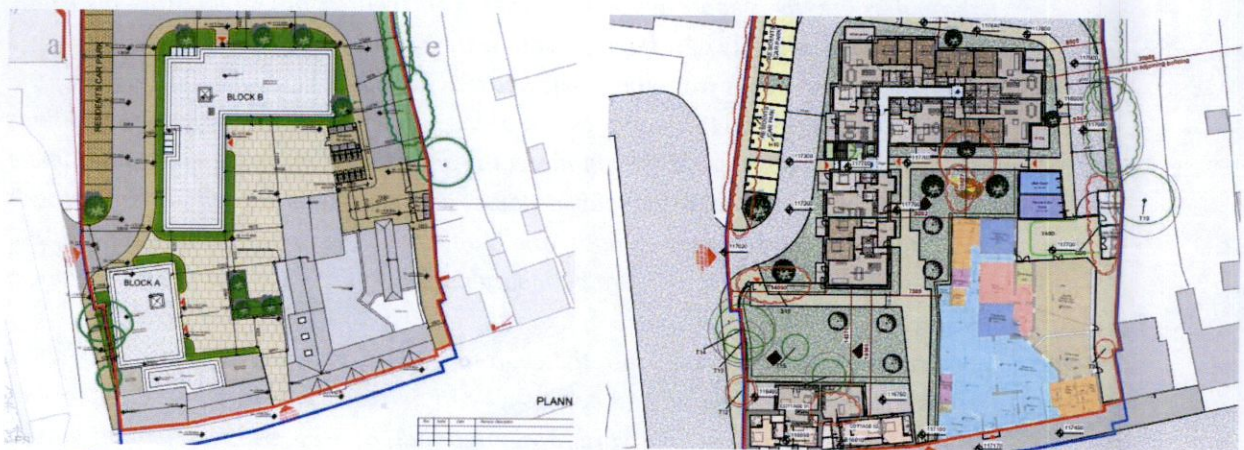


Figure 8: Extracts from initial site layout and proposed site layout after changes made in the AI stage.

- (i) The access point from the courtyard to Main Street will now be controlled by key fob for residential use only. This is to be implemented through an electronic key fob access

system. This will address the issue of providing for a through-out route that would potentially disrupt the residential amenity and enjoyment of the communal area for the residents. As a result, this will lead to the protection of residential amenity for the proposed development.

- (ii) The residents of the proposed development will have communal open space of 633 sq. m, which exceeds the minimum standards set out within the apartment guidelines (2022). The communal space within the courtyard is to consist of a small child play area, in which the apartments will provide passive surveillance for safety. Access from the south and west, will now also be controlled access points for residential use only. Again, this will be implemented through electronic key fob access.
- (iii) The emergency access from the public house has been altered so that it does not open onto the communal area of the residential development. DOWNEY have consulted with a fire consultant who has advised on the re-design of the internal layout of the Pub to provide for an alternative emergency access point. Please refer to the revised drawings prepared by DOWNEY and submitted under separate cover for further information.
- (iv) The windows facing onto the courtyard space are to be removed and replaced with skylights, to ensure that the issue of noise and odours will not harm the residential amenities offered by the courtyard. This allows for the uninterrupted use of the communal space by the residents and reduces the need to provide additional balcony space which may not be as flexible a use.

(B) Regarding the acoustic design, an updated Acoustic Design Report prepared by Amplitude Acoustics has been enclosed with this additional information response under separate cover. The revised report assessed the air and traffic noise within the vicinity of the site.

The report concludes that the proposed developments open communal courtyard area has sufficient noise levels due to the apartment block acting as a screening measure. This communal space will provide a usable flexible space for the residents with seating and informal gathering and play areas. The Public House will be screened with planting to enclose the space and provide a sense of community in the area.

The proposed balconies to the north elevation of the development did not achieve desirable noise levels. As a mitigation measure, winter gardens have been implemented on units 0.4, 0.5, 1.4, 1.5, 2.4 and 2.5 which are 13.5 metres from the northern site boundary and 9.0 metres from the eastern

boundary. This will act as a further screening measure in regard to noise pollution. This was deemed as acceptable by Amplitude Acoustics in regard to mitigation measures in addressing noise concerns.

DOWNEY submit that the proposed revisions to the design has ensured for the protection of the residential amenities of the residents, while also ensuring for a high-quality scheme to be delivered.

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## 5.0 Additional Information Request No. 5

### **Residential Floor Area Standards:**

*“As per sections 3.8 – 3.15 of the 2020 Apartment Guidelines, a 10% uplift on the minimum standards should be provided for either in a majority of units, or spread out more evenly over a larger number of units. The applicant has not complied with sections 3.8 – 3.15, and should show compliance with this part of the 2020 guidelines by way of additional information”*

### 5.1 Applicants Response No. 5

In response to additional information request no. 5, DOWNEY have enclosed the revised floor plans and design statement which provide for the schedule of accommodation and details the revised proposed floor plans against the specified requirements stated within the *Sustainable Urban Housing: Design Standards for New Apartments (December 2022)*. Please refer to these for further information into the proposed floor areas (2<sup>nd</sup>, 1<sup>st</sup>, and Ground Floors) and how they meet national guidelines.

The proposed units within the development meet the threshold of the 10% uplift of the minimum standards as per the apartment building standard guidelines 2022, spread over a larger number of the units.

As per section 3.12, it states the following:

*‘The requirement for more than half of the apartments in relevant schemes to generate additional floorspace that would exceed the minimum floor area standard by at least 10%, may be applied differently to schemes of 10 up to 99 units. In such schemes, it is acceptable to redistribute the minimum 10% additional floorspace requirement throughout the scheme, i.e. to all proposed units, to allow for greater flexibility.’*

DOWNEY submit that the applicants proposed development meets the apartment building standard guidelines of allocating an extra of minimum 10% extra floorspace uplift throughout the residential





scheme. The revised residential scheme reflects the criteria of Sections 3.8 – 3.15 of the *Sustainable Urban Housing: Design Standards for New Apartments 2022*.

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## 6.0 Additional Information Request No. 6

### Village Centre.

(a) *“The proposed development features ground floor units fronting onto streets in Block B which are not provided with own-door access. It is considered appropriate given the village centre setting, that the units fronting onto the internal access street or the internal courtyard are provided with own-door access, and the circulation areas at ground floor can consequently be reduced. The applicant is invited to consider and respond to this.*

(b) *It may be appropriate that units 02 (Block A) and 07, 08, 09, 10 and 11 (Block B) should be delivered as convertible units, with a floor-to-ceiling height that would be potentially appropriate for small-scale retail, retail services or niche retail units, subject to later planning. The applicant is invited to consider and respond to this.”*

### 6.1 Applicants Response No. 6

The applicant has taken into consideration the recommendations contained within request item 6 of the additional information response.

- (a) In response to the own-door access comment, DOWNEY consider this to be appropriate in some instances within the revised scheme. It was considered appropriate to provide own-door access units fronting onto the internal access street via the courtyard. A revised layout plan showcasing the new own-door access areas for the ground level units No. 01 and No. 02 have been provided, with an apartment entryway entrance being provided facing the courtyard area to ensure the remaining ground and upper floor units have access to the open communal areas.
- (b) With regard to floor-to-ceiling height adjustments to units within the apartment block, the residential scheme has been modified to provide for a singular ‘L-shape’ apartment block design. The floor-to-floor height of the proposed ground units stands at 3.125 metres. We submit that a small-scale retail, retail services or niche retail units would be an inappropriate use of land in this location as it is designated for resident access only. It is considered that the

conversion of the ground floor units in the future would conflict with the residential amenity of the communal courtyard and the setting of the cottages on main street within the ACA.

DOWNEY submit that the proposed changes have been made in cognisance with the suggestions that were provided by South Dublin County Council, and it was deemed that this was the most appropriate design to adopt in this instance.

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## 7.0 Additional Information Request No. 7

### Aviation Safety:

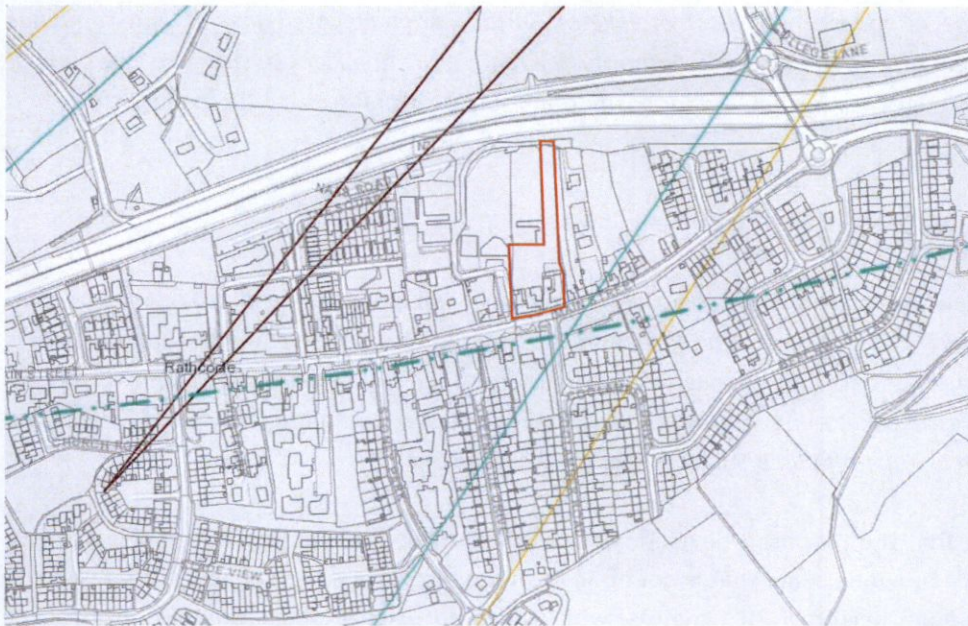
(A) *"The site is located in the 'critical safety zone', underneath the runway approach to runway 05. Section 7.8.1 of the County Development Plan identifies runway 05/23 as being a secondary runway. The site is not located in the inner approach zone, where development is not permissible. As per Policy IE8 objective 3(c), and the County Development Plan maps, "the ICAO standards will not prejudice the development of zoned lands in Rathcoole". The applicant has not addressed the issue of aviation safety, either in terms of noise or building height/ obstacle limitations. They should provide comment by way of additional information. As per Section 11.6.6 of the Development Plan, the Planning Authority request the applicant to submit a longitudinal section through the relevant Approach Surface funnel. The section drawing shall include the following: - The Ordnance Datum (OD) of the relevant runway, - The approach surface slope for the relevant runway in accordance with Table 3 & 4 of the IAA Guidance Material on Aerodrome Annex 14 Surfaces (2015) The OD of the highest point and OD of the predominant height of the proposed development, - A range of OD reference points for the existing ground levels on the subject site, - The horizontal distance of the subject site from the Aerodrome, and - Heights of existing permanent obstacles in the vicinity of the site if applying the principle of shielding (see Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces, 2015). - The distance from threshold shall be taken into account in the section drawing.*

(B) *The Acoustic Design Statement has not taken into account aircraft noise. The applicant's acoustic design consultant should make a comment on this matter and submit a revised assessment report if necessary, by way of additional information"*

## 7.1 Applicants Response No. 7

DOWNEY submit to the council that the proposed development does not meet the criteria of requiring part (A) of this additional information request, due to the recently adopted South Dublin County Development Plan 2022 – 2028, and revisions to policies and objectives in regard to aviation safety. There has been revisions of policies and objectives in regard to Casement Aerodrome, in which we will provide a justification as to why this additional request is not relevant to the subject site as of present day.

The newly adopted South Dublin County Development Plan 2022 – 2028 also provides for revisions to the policies in regard to aviation safety since the Development Plan that this planning application was assessed under. The subject site falls neither under the 'Inner Public Safety Zone' nor the 'Outer Public Safety Zone' on the zoning maps, seen in Figure 6. The subject site falls within the 'Inner Horizontal Surface', 'Approach Surface', 'Take Off Climb Surface' and 'Noise Significant Boundaries'.



**Figure 9: South Dublin County Development Plan 2022 - 2028 Land Zoning Maps, with Aviation Overlay. Subject site denoted in red outline.**

DOWNEY submit that the proposed development does not fall under the 'critical safety zone' (known as the 'Inner Public Safety Zone' and 'Outer Public Safety Zone' in the recently adopted Development Plan) and is therefore not subject to revising the issue of aviation safety in this regard.

It is important to note that no objection was received on file from any aviation authority operating in the area.

In regard to Inner Horizontal Surfaces, the Development Plan states the following:

*“Under the Inner Horizontal Surfaces, development **may be permitted up to 45 metres above the elevation datum of the relevant aerodrome**, and the prevalent building height (and elevation OD) of the surrounding area will be taken into account. The Inner Horizontal Surface of Casement Aerodrome is at elevation 131.6m OD, and the Inner Horizontal Surface of Weston is at elevation 91.3m OD.”*

**Section 12.11.5** states the following in regard to development management:

*“The Planning Authority will consult with the Department of Defence (DoD) and the Irish Aviation Authority (IAA), as relevant, in this assessment. For development close to an aerodrome, or under an Approach or Take-off Surface, **or on elevated ground under an Inner Horizontal Surface**, the Planning Authority will require the applicant to submit a longitudinal section through the relevant ‘Obstacle Limitation Surface’ [for instance, Approach Surface, and so on].”*

**Section 11.8.7 Public Safety Zones** state the following:

*“These new Inner and Outer Public Safety Zones will apply at Casement and at Weston, and pending further review, will all be of the same size for all runways (in view of the broadly similar traffic figures at both aerodromes). Within these Inner and Outer Zones, development will also remain restricted to the maximum heights / elevations permitted under the runway’s Approach or Take-off Climb Surfaces (per ICAO specifications)”*

DOWNEY submit that the proposed development does not meet the criteria of the above, as the subject site is on a brownfield site that is not at an elevated height, and the proposed development stands at a maximum height of 10.1 metres, which does not exceed the maximum heights and elevations that are permitted.

The school planning application to the rear of the site under Reg. Ref. 21A/0361 granted permission sets a precedence for three-storey building units within the immediate area, in which it stands at a maximum height of 11.55 metres. The proposed development is adjacent to the school site and has a maximum height of 10.15 metres. DOWNEY submit that the proposal would be in accordance with the proper planning of aviation safety, subject to revised notes and conditions if deemed necessary.



(B) In response to Part (B) of the Additional Information request, the initial Acoustic Design Statement has been revised to include for the revision of aircraft noise, and an updated Acoustic Design Statement is enclosed within this additional information response. The report concludes with the following in regard to aviation noise:

*“The acoustic design guidance in this report mitigates both the aircraft noise levels and road traffic noise levels.”*

DOWNEY submit to the Council that the proposed design is in accordance with the policies and objectives guiding development in regard to aviation safety, and these have been responded to within this cover letter response and enclosed documentation.

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## 8.0 Additional Information Request No. 8

### Overlooking.

*“The school has objected to the possibility over overlooking from Block B into the school site. Reviewing the permitted plans (SD21A/0231) and the proposed development, it would appear that there is the possibility of overlooking into the front area of the school, though not necessarily a playground. This can be avoided by reorienting the living rooms and balconies of Block B at the northwestern corner to face west, rather than face north. The applicant can address this via additional information.”*

### 8.1 Applicants Response No. 8

DOWNEY have taken into consideration the issue of the possibility of overlooking from the proposed development into the recently permitted school site (Reg. Ref. SD21A/0231) adjacent to the site boundary. The submitted revised drawing plans in conjunction with documentation show that the apartment block has been re-designed to be set-back further from the party boundary, this has allowed for the provision of additional landscaping to be provided which will screen the development from the school site.

In addition to this, the balconies facing north have been adjusted to prevent potential adverse overlooking into the school from the north-west of the subject site. The yards and balconies on the north facing elevation of the proposed development are to have wintergarden private open spaces, which will act as a further screening method. The applicant would welcome a condition to provide obscure glass should the local authority consider it necessary.

From the north-west perspective of the balcony, the front yard (drop-off school area) will be slightly visible which will not cause the issue of overlooking, along with the proposed main entrance structure of the school (part of building which has windows facing the apartment block) which is at a distance of greater than 22 meters.



Figure 10: Extract from submitted south elevation plans under Reg. Ref. SD21A/0361. Note that section of building closest to boundary facing the proposed development does not consist of windows that will cause for direct overlooking between windows.



Figure 11: Extract from submitted landscape plans under Reg. Ref. SD21A/0361. Note the main play area is to be at the north of site, which is situated at a distance greater than 22 metres that it would not cause overlooking.



The main play amenity of the school granted under Reg. Ref. SD21A/0231 is to the north of the subject site at a distance greater than 22 metres. There is a small play area to the south-east of the subject site at the corner. To address potential overlooking into the smaller play area, the revised landscape plan has included for the provision of semi-mature and mature tree foliage screening along the boundary of the sites as an additional measure to reduce overlooking.

A wall at a height of 2.4 metres on the boundary will act as further screening from the ground level to ensure overlooking into the school will not occur from ground levels. Winter gardens are proposed on the northern elevations of the proposed development as private open spaces to act as further screening.

The operational hours of schools will be during daytime, in which we submit that it is unlikely that excessive overlooking into the school front area would occur from the bedroom windows of the north elevation of the apartment block which consist of the family units (3-bedroom units) which would likely have families with children occupying these rooms and attending school during similar functioning hours.

Regarding the revision of the design set-back from the cottages, overlooking will not occur into the rear private gardens. Cottage no. 1 has no windows facing the apartment block. Cottage no. 2 has 2 no. windows facing into the courtyard area. The distance of opposing windows from the cottages to the apartment block is 19.3 metres. As an infill development, we submit that this is a sufficient distance, and that adverse overlooking will not occur.

DOWNEY submit to the council that the revised design has taken into consideration the issue of overlooking and has adapted the design to ensure that adverse overlooking will not occur as a result and have implemented screening measures within the proposed apartment block and the landscape plan to reduce the possibility of overlooking from the north-west elevation of the apartment block.

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## 9.0 Additional Information Request No. 9

### Building Lifecycle Report:

*"The applicant should provide a Building Lifecycle Report by way of additional information, to fulfil the following recommendation of section 6.13 of the Apartment Guidelines (2020):*

*'6.13: Accordingly, planning applications for apartment development shall include a building lifecycle report which in turn includes an assessment of long term running and maintenance*

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*costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents.”*

### **9.1 Applicants Response No. 9**

The applicant has retained DOWNEY to prepare a building lifecycle report for the proposed development. Please find enclosed the building lifecycle report that addresses the additional information request. DOWNEY submit that the building lifecycle report has had cognizance with the recommendations of section 6.12 of the Apartment Guidelines (2022).

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## **10.0 Additional Information Request No. 10**

**Road Safety Audit:** *“The applicant is invited to provide a Stage 1 & 2 Road Safety Audit which should focus on the junction being created at the vehicular entrance to the site.”*

### **10.1 Applicants Response No. 10**

The applicant wishes to submit that the Traffic and Transport Assessment completed by NRB consulting engineers adequately responds to the potential traffic related concerns in regard to the proposed development, as part of the Additional Information Request No. 1. Please refer to Appendix F within the submitted Traffic and Transport Assessment which contains an independent Stage 1 & 2 Road Safety Audit for further information completed by Bruton Consulting Engineers.

It was observed that two potential problems arose as a result of the proposed development. These problems were identified with solutions, which the applicant has amended the design further to address these.

1. It was observed during the site visit that there is some vegetation to the right for drivers exiting the development. This vegetation could obscure sightlines during the summer months.
2. There is no existing pedestrian access along the ‘Old’ main street.

These identified problems have been addressed in the additional information stage of the proposed development and can be seen throughout architectural drawings submitted by DOWNEY.



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## 11.0 Additional Information Request No. 11

**Electric Charging of Vehicles:** *“The applicant is invited to revise their Site Layout Plan to show the provision of 10% of spaces with facilities for charging electric vehicles, both in the residential and pub car park areas.”*

### 11.1 Applicants Response No. 11

The applicant has retained DOWNEY to include for the revisions to the site layout plan in relation to the provision of electric charging of vehicles. Please refer to their architectural drawings pack enclosed with this response for further details. 7 spaces will have access to EV charging. We submit that the proposed development is in accordance with the updated South Dublin Development Plan 2022 – 2028, which under Section 12.7.5 recommends for a minimum of 20% provision of electric vehicle charging parking spaces.

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## 12.0 Additional Information Request No. 12

### Public Realm:

*There are concerns with the lack of information submitted in terms of a landscaping scheme and boundary treatment for the proposed development. The applicant is requested to provide a landscape design including details of boundary treatment for the proposed development. The applicant is requested to provide a detailed landscape plan with full works specification, that accords with the specifications and requirements of the Public Realm Section. The landscape Plan should include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including integrated/bio retention tree pits. In addition, the applicant is requested to submit a landscape rationale. The landscape proposals should be prepared by a suitably qualified landscape architect.*

### 12.1 Applicants Response No. 12

The applicant has retained DOWNEY to provide for a further detailed landscaping scheme plan, including for revised drawings and a landscape rationale report prepared by a qualified landscape architect which has been submitted as part of this additional information response. Please refer to

the updated drawings, landscape plan and the landscape rationale report for a holistic response to the requests made by South Dublin County Council providing further information on proposals.

The subject site is an infill brownfield site which is currently being used as an underutilized surface car-park at Main Street in the centre of the built-up area. The subject site is situated in close proximity to a number of public open spaces, most noticeably Rathcoole Park, which is assigned the hierarchy of being a Neighbourhood Park, which is situated at a distance of 550 metres from the subject site. Other amenity sites include the Four Districts Woodlands, Rathcoole Football Club, and the Citywest Health & Leisure Club.

We are therefore of the professional opinion that a requirement to provide for open space can be omitted in this regard due to the provision of a neighbourhood park in the locality (c. 550 metres) and the infill nature of the subject site leading to site constraints in which it is not feasible to provide for public open spaces that would be of high quality as per Section 8.7.4 of the South Dublin County Development Plan 2022 – 2028.

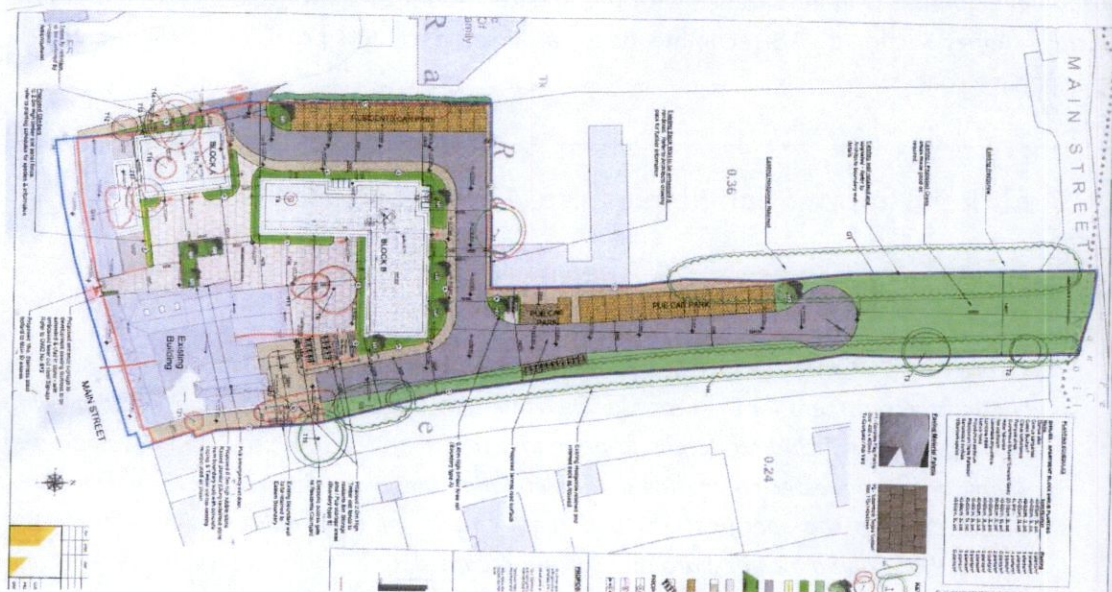
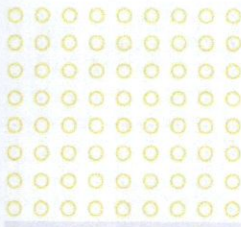


Figure 12: Initially proposed landscape plan



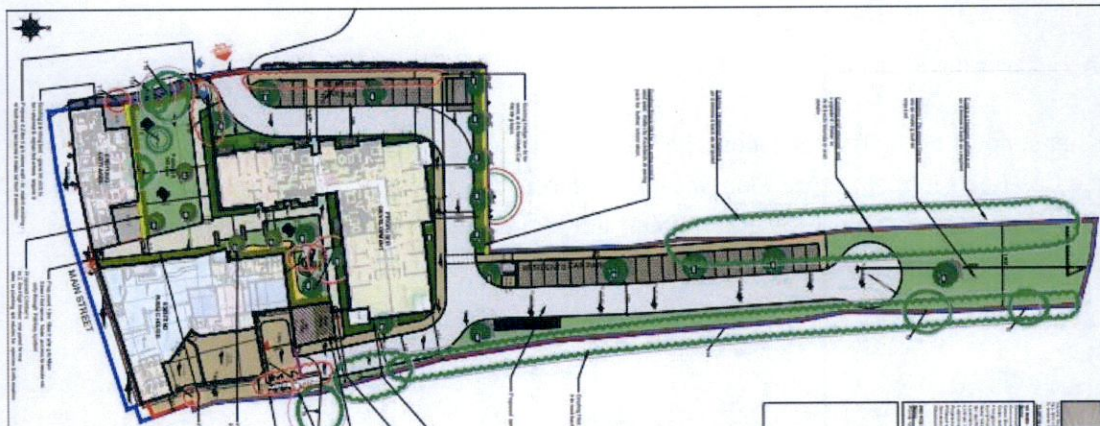


Figure 13: Extract from submitted landscape plan in response to additional information.

DOWNEY submit that the proposed development has included for revisions to the proposed public realm of the development, and that it reflects a scheme of higher quality. Existing hedgerows are retained where it is feasible to do so. A provision of tree planting is to be provided to make-up for the loss of natural vegetation which will result in a net increase provision of green infrastructure for the proposed development.

The landscape proposals indicate that the residents of the proposed development will have communal open space of 633 sq. m, which exceeds the minimum standards set out within the apartment guidelines (2022) which state a minimum of 171 sq. m of communal open space should be provided. The communal space within the courtyard is to consist of a small play area, in which the apartments will provide for active and passive surveillance for safety.

The landscape design has been modified on note with the South Dublin County Development Plan 2022 – 2028, the apartment guidelines (2022) and the South Dublin Green Space Factor Guidance Note.

## 13.0 Additional Information Request No. 13

### Green Infrastructure:

*“The applicant is requested to submit green infrastructure proposals to help mitigate and compensate for the impact of the proposed development on this green field site and the removal of a hedgerow. These proposals should include additional landscape details, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population. The response should include drawings.”*

### 13.1 Applicants Response No 13

In further support of the revised landscape plans and documentation submitted, DOWNEY have also enclosed a Green Infrastructure Plan within the landscape package which can be referred to for further information on landscaping and green infrastructure proposals, specifically within drawing 436-003-PL-617\_Proposed Green Infrastructure.



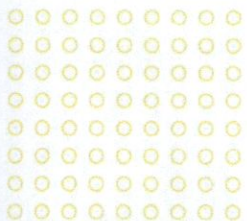
Figure 14: Photograph Evidence of the subject site not being a greenfield site, primarily an informal concrete car parking area.

DOWNEY want to reiterate that the subject site is **not** a green field site. It is a backland infill, brownfield site that is primarily used as an informal car parking area.

Attached to the Green Infrastructure Plan is a completed GSF (Green Scoring Factor) Score Sheet. The proposed development site is zoned a mix of residential and village centre and as such must achieve a minimum score of 0.5 to pass the GSF.

Given the fact that the site currently has minimal green infrastructure on-site given it's current use, it is submitted that the proposed development and associated landscaping plan is a vast improvement on the current and will provide ample vegetation and biodiversity within this urban area.

The site achieves a score of 0.46 and as such fails the GSF Scoring. As outlined within the GSF Guidance, the applicant is amenable to engagement with the SDCC Park Department to explore the offset of the GSF Scoring at and agreed off site location.



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## 14.0 Additional Information Request No. 14

### Sustainable Drainage Systems (SUDs):

*"The applicant has not proposed any SuDS (Sustainable Drainage Systems) features for the proposed development. The applicant is requested to submit a drawing in plan and cross-sectional views clearly showing proposed Sustainable Drainage Systems (SuDS) features for the development. a) The applicant is requested to show natural SUDS features for the development such as Green roofs, swales, tree pits, permeable paving, and other such SuDS and show what attenuation capacity is provided by such SuDS. b) The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details. c) SDCC Water Services estimate that the attenuation of 411m<sup>3</sup> proposed is undersized by 15%. The applicant should explore the possibility of installing SuDS devices such as grasscrete, and permeable paving in footpaths and road areas and this may reduce or eliminate the need to extend or use attenuation tanks as proposed. d) The applicant is requested to submit a revised drawing showing a petrol interceptor upstream of attenuation system close to entry point of same. The greater Dublin regional code of practice for drainage works states that petrol interceptors should be installed upstream of any attenuation systems. The drawing submitted by applicant shows the petrol interceptor installed downstream of the attenuation system and this should be corrected. Note: SUDs features include but are not not limited to the following: - Permeable Paving - Grasscrete - Rain Gardens - Planter boxes with overflow connection to the public surface water sewer. - Swales - Channel Rills"*

### 14.1 Applicants Response to No. 14

The applicant has retained EDPM Consulting Civil and Structural Engineers to prepare a revision of drawings and documentation in response to additional information no. 14. Please refer to their engineer's pack enclosed with this response for further details. EDPM have provided for a comprehensive response to the additional information in regard to SuDs, in which the following conclusion was assessed:

*"The attenuation storage calculations were reviewed and checked. The design operating volume of the attenuation storage is 472.3m<sup>3</sup>, not 411m<sup>3</sup> as stated in the request for Additional Information. Again, due to site shape etc, the 472.3m<sup>3</sup> volume caters for the 1 in*

*100-year event. SuDS features such as some open spaces and tree pits would be of some benefit but have not been taken into consideration (due to prevailing ground conditions.)"*

DOWNEY submit that an investigation into the feasibility of the SuDs potential for the subject site was carried out by EDPM, in which it was determined that the site context does not lend itself to conditions that enable for SuD measures to be implemented such as permeable paving and swales. For measures that were selected as SuD features for the proposed development such as tree pits, they have had cognisance with the SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022.

DOWNEY submit that the proposed SuDs for the proposed development is appropriate in this instance, subject to revised conditions and notes if deemed necessary.

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## 15.0 Additional Information Request No. 15

### Attenuation:

*SDCC Water Services estimate that the attenuation of 411m<sup>3</sup> proposed is undersized by 15%. The applicant should explore the possibility of installing SuDS devices such as green roofs, grasscrete, and permeable paving in footpaths and road areas and this may reduce or eliminate the need to extend proposed attenuation tanks.*

### 15.1 Applicants Response to No. 15

The applicant has retained EDPM Consulting Civil and Structural Engineers to prepare a revision of drawings and documentation in response to additional information no. 15. Please refer to their engineer's pack enclosed with this response for further details. EDPM have provided for a comprehensive response in which the following conclusion was assessed:

*"The Architectural Layout of the site has altered and as a result the areas of open spaces and hardstanding have altered. Irrespective of the above, this alters the surface water runoff volume and the attenuation. This results in an overall attenuation volume of  $16.3 + 345.5 = 361.8\text{m}^3$ . The attenuation volume on the revised drawings has been revised to reflect this."*

Section 12.11.1 (iii) of the Development Plan states the following:

*"In some exceptional cases and at the discretion of the Planning Authority, where it is demonstrated that SuDS devices are not feasible, approval may be given to install*

*underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort."*

The applicant has explored the possibility of installing SuDs devices, but however as identified, due to the site constraints as an infill development, urban consolidation, and poor infiltration, it is not feasible to implement further SuDs devices. This was also identified for the school site adjacent to the subject site under Reg. Ref. SD20A/0119 with a failed ground infiltration test. The school under Reg. Ref. SD21A/0231 is to provide for two attenuation storage tanks.

The proposed attenuation storage for the subject site has been reduced from 472.3m<sup>3</sup> to 361.8m<sup>3</sup> which is in accordance with the attenuation storage requirements of the proposed development in regard to stormwater management.

DOWNEY submit that the proposed attenuation for the proposed development is appropriate in this instance, subject to revised conditions and notes if deemed necessary. Please refer to the engineers pack provided under separate cover for further detail.

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## **16.0 Additional Information Request No. 16**

### **Operational Waste Management:**

*"The proposed development provides for refuse waste to be stored in the courtyard area, away from site accesses. The applicant should provide an Operational Waste Management Plan to show how waste will be stored and taken away during occupation, and if necessary, how refuse vehicles will access the waste. This should be undertaken by way of additional information."*

### **16.1 Applicants Response to No. 16**

We wish to note that pub refuse will be separate from the residential scheme refuse system. The initial drawings of visibility splays indicate that Heavy Goods Vehicles (HGVs) are able to navigate within the site, and this stands within the revised scheme due to no proposed changes to the road layout of the subject site. The width of the road stands at 5.5 metres wide, which enables for the access and egress vehicles to the subject site.

DOWNEY wish to submit that in response to Additional Information No. 16, the scheme has been designed to provide the appropriate level of refuse storage for the residential and commercial element of the scheme. As outlined above these refuse storage areas have been separated to ensure clear use for each element of the development. The management of the refuse storage and collection will be carried out by the management company. Detail of the operation of the process will be agreed in the formation of the management company contract.

The applicant has indicated that South Dublin City Council are invited to apply a condition that prior to the commencement of construction, an Operational Waste Management Plan is to be submitted to the Planning Authority for approval.

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## 17.0 Additional Information Request No. 17

### Taking in Charge / Management Company:

*The applicant has not provided a Taking in Charge Plan and has not indicated those parts of the development to be retained in private ownership, or to be taken over by an Owner's Management Company or similar acceptable body. The applicant should address this by way of additional information.*

### 17.1 Applicants Response to No. 17

It is the intention of the applicant to provide details for the proposed management company that will be in charge of the residential scheme prior to commencement of development. We invite South Dublin County Council to consider attaching a condition requesting that details regarding the management company will be agreed with the Council prior to commencement of development.

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## 18.0 Additional Information Request No. 18

*The applicant is requested to note that the South Dublin County Development Plan 2022-2028 plan making process is reaching a conclusion in the coming months. The applicant is advised that the Planning Authority is required to assess planning application having regard to the active Development Plan at the time. The further information response should provide a report demonstrating that the revised proposal is fully in compliance with the adopted new Development Plan (if relevant).*





### 18.1 Applicants Response to No. 18.

In response to additional information request no. 18, DOWNEY have carried out an assessment of the proposed development against the recently adopted development plan, which came into effect on the 3<sup>rd</sup> of August 2022. The revisions to the design of the proposed development have had cognisance with the following documents in conjunction with the updated Development Plan:

- Urban Design Manual – A Best Practice Guide, DEHLG (2009);
- The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
- Quality Housing for Sustainable Communities Guidelines, DEHLG (2007);
- Sustainable Urban Housing: Design Standards for New Apartments (2022).

The overall additional information cover letter response outlines the series of policies and objectives where relevant to the respective section. We submit that the revised design of the proposed development has had cognisance with the new South Dublin Development Plan 2022 – 2028 which has guided changes in the design process within the additional information stage.

### 19.0 Conclusion

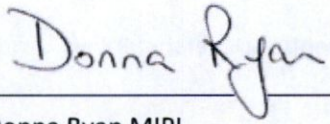
The applicant has sought to address in full the additional information requested by South Dublin County Council and has submitted a comprehensive response to the request. Accordingly, we respectfully request that planning permission is granted, subject to appropriate conditions, for the proposed development at the application site.

For clarity, please note the following list of documents which have been submitted with this response, as follows: -

- 6 no. copies of the architectural drawings and documentation prepared by DOWNEY;
- 6 no. copies of the design statement prepared by DOWNEY;
- 6 no. copies of the architectural heritage impact assessment prepared by DOWNEY;
- 6 no. copies of the landscape plan drawings and documentation prepared by DOWNEY;
- 6 no. copies of the traffic and transport assessment report prepared by NRB Consulting Engineers;
- 6 no. copies of the drainage drawings and documentation prepared by E.D.P.M Ltd.,
- 6 no. copies of the acoustic design report prepared by Amplitude Acoustics;
- 6 no. copies of the cover letter response to the additional information request prepared by DOWNEY.

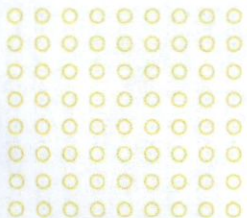
We trust that the particulars are in order for the response to the request for additional information. If there are any queries, please do not hesitate to contact the undersigned. We look forward to a favourable decision by South Dublin County Council in due time.

Yours sincerely,



Donna Ryan MIPI  
Associate Director

*For and on behalf of DOWNEY*



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