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The Planning Section
South Dublin County Council
County Hall
Belgard Square North
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Co. Dublin

29 March 2023

Re: Clarification AI Response for Tay Lane, Rathcoole Age-Friendly Development (Pl. Ref. SD22A/0342)

Applicant: Riverside Projects Limited

Address: Lands located to the east of Tay Lane, Newcastle Road, Rathcoole, Dublin 24

Dear Sir/Madam,

KPMG Future Analytics, 1 Stokes Place, St. Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants), have been instructed by our client, Riverside Projects Limited, 8 Herbert Place, Dublin 2, Ireland to prepare and submit this Additional Information (AI) Clarification Response in respect of the planning application (Pl. Ref. SD22A/0342) for an age-friendly housing development with associated shared amenity facilities, high quality open space and parking at the above-referenced site address.

On 25th January 2023, the Planning Department of South Dublin County Council (SDCC) issued a Clarification of AI in relation to the Proposed Development. This Clarification AI comprises of 6 no. items.

The materials included in the response pack – prepared by PAC Studio, CORA, Martin Rogers Consulting Ltd and Gannon and Associates form the basis of the AI Clarification response. Importantly, this covering letter should be read in conjunction with these other materials.

In support of this AI Clarification Response, please find the following plans and particulars enclosed:

Requirement	Author	Copies
PLANNING PARTICULARS		
Cover Letter	KPMG FA	6
DRAWINGS		
Architectural Drawings	PAC Studio	6
Architectural Drawings Schedule	PAC Studio	6
Landscape Drawings	Gannon & Associates	6

Requirement	Author	Copies
Landscape Document Issue Sheet	Gannon & Associates	6
Engineering Drawings	CORA	6
Engineering Drawings Schedule	CORA	6
REPORTS		
CORA AI Response Letter (28 th March 2023)	CORA	6
Traffic and Transport Assessment (March 2023)	Martin Rogers	6
Green Factor Calculator	Gannon & Associates	6

1.0 Summary of Changes

In response to the AI Clarification, a series of relatively minor changes were made to the Proposed Development. These are principally comprised of:

1. Modifications to the pedestrian access point on Eaton Drive to reduce the height of boundary pillars to 1m and replace a section of the boundary wall with a 1.0m fence to improve forward visibility for vehicles and pedestrians.
2. Provision for a new 1,120 sqm green roof on the apartment building.
3. Provision of a 2m wide footpath within the Site running along the eastern side of the excavated watercourse running along the western side of Tay Lane from the northern to the southern site boundary.
4. Widening the existing footpath along the western side of Tay Lane to a minimum dimension of 1.8m.
5. Widening internal pedestrian paths within the Site to 2m.
6. Provision of a shelter for all external cycle parking stands located adjacent to the car park.
7. Various modifications to the internal apartment building layout to maximise universal accessibility to the greatest extent possible, modifications are as follows:
 - a) A 1500x1500mm entrance lobby space is provided in each apartment
 - b) Dual WC access is provided for within 92.6% of bedrooms – a soft spot in the wall is provided in the WC adjacent to the primary bedroom to provide for en-suite access
 - c) Electric wheelchair charging / storage room at entrance, beside community facility
 - d) Enlarged lift to allow turning an electric wheelchair inside lift
 - e) 300mm space on leading edge of each door throughout development
 - f) 1800mm wide communal corridors with wheelchair passing places incorporated into design
 - g) It is also confirmed that the internal floor area of each apartment is at least 10% above the relevant minimum floor area as per the Apartment Guidelines.
 - h) In addition to the apartment block modifications, an Electric Wheelchair Charging facility is provided adjacent to the Community Facility and Bin Store block with independent entrance.

2.0 Item 1: Traffic and Transport Assessment

Clarification Item 1 stated and sought the following:

"The applicant is requested to submit a Traffic and Transport assessment of the nearby junctions,

to confirm that the development will have no impact on the traffic flows on the Rathcoole Main Street, showing the RFC results of all arms of the junction."

The enclosed Traffic and Transport Assessment (TAA) (March 2023) prepared by Martin Rodgers Consulting Ltd assesses the impact of the Proposed Development on the junction of Main Street and Forest Hill and the roundabout at the intersection of Beechwood Lawns and R120. The scope of surveys and assessment provided in the TTA was agreed with Mr. Graham Murphy of the South Dublin County Council during a site meeting on Friday 17th February. For further details refer to the enclosed CORA AI Response Letter.

The TAA results show the Proposed Development will have an insignificant impact on the local road network, increasing flows at the Tay Lane / Main Street / Forest Hills staggered priority junction by a maximum of 1.52%, and increasing flows at the R120 North / R120 east / Main Street roundabout by a maximum of 0.34%. In both cases, the assessed flows are well below the threshold for requiring full analysis of the junctions as per the 2014 TII Guidelines. However, a full junction assessment has been provided in this case as requested by the Council to fully evidence our previous conclusions that the Proposed Development will have a have an insignificant impact on the local road network.

3.0 Item 2: Pedestrian Entrance Boundary Details

Clarification Item 2 stated and sought the following:

"The applicant shall submit a revised layout of not less than 1:200 scale, showing boundary walls at pedestrian access point on Eaton Drive limited to a maximum height of 0.9m, and any boundary pillars limited to a maximum height of 1.2m, in order to improve forward visibility for vehicles and pedestrians."

The pedestrian access point on Eaton Drive has been modified to reduce the height of boundary pillars to 1m and replace a section of the boundary wall with a 1.0m fence to improve forward visibility for vehicles and pedestrians. Refer to architectural drawing no. RATH A5-01 for full details.

4.0 Item 3: Internal Pedestrian Layouts

Clarification Item 3 stated and sought the following:

"The applicant is requested to submit a revised layout not less than 1:200 scale showing pedestrian routes within the development.

- a. The minimum width of footpaths shall be 2.0m wide to aid mobility impaired users.*
- b. All external bicycle parking spaces shall be covered.*
- c. Footpath layout shall provide adequate connectivity around the development and to footpaths on the main road."*

In response to Item 3 all internal footpaths have been extended to 2.0m wide to provide a continuous 2m wide pedestrian access path from the main road (Tay Lane and Eaton Drive) to the building entrances. A shelter is provided for all external cycle parking stands located adjacent to the car park. Refer to architectural drawing no. RATH A1-20 for full details.

5.0 Item 4: Tay Lane Footpath

Clarification Item 4 stated and sought the following:

"The applicant is requested to submit a revised layout not less than 1:200 scale showing an improved footpath along the entire east side of Tay Lane connecting to Rathcoole Main Street, the

footpath must be 2.0m wide.”

The enclosed CORA AI Response Letter provides details of engagement with Mr. Graham Murphy of South Dublin County Council to agree pedestrian access arrangements from Tay Lane considering the existing site constraints. At the meeting on the Friday 17th February, it was agreed to carry out the following works as part of the development works:

- a) The existing culvert to the east of Tay Lane was to be opened as requested by the drainage department of South Dublin County Council.
- b) The existing footpath to the west of Tay Lane was to be widened to a minimum dimension of 1800mm.
- c) A provision for a 2.0m wide footpath within the site boundary of the proposed development is to be constructed to the east of the opened culvert. This would extent from the northern to the southern boundary.

All of the above works are shown and detailed on enclosed CORA drawing C.006 (Revision P2) and reflected in the enclosed architectural and landscape drawing packs.

6.0 Item 5: Universal Accessibility

Clarification Item 5 stated and sought the following:

“It is not considered that the applicant has designed a scheme that could be considered universally accessible to the greatest extent possible. The applicant asserts that the development could be used to house people on the Local Authority housing list who have mobility issues, however the floor plans provided do not appear to provide accommodation of any significant benefit in terms of accessibility, when compared with a standard apartment unit. On this basis, the applicant is requested to revise the layouts for a number of ground floor units to maximise their potential as totally universally accessible units, including dual access and/or en-suite bathrooms, and suitable storage for wheelchairs and other such necessary mobility equipment.”

Various modifications have been made to the internal apartment building layout to maximise universal accessibility to the greatest extent possible. The modifications are as follows:

- a) A 1500x1500mm entrance lobby space is provided in each apartment
- b) Dual WC access is provided for within 92.6% of bedrooms – a soft spot in the wall is provided in the WC adjacent to the primary bedroom to provide for en-suite access
- c) Electric wheelchair charging / storage room at entrance, beside community facility
- d) Enlarged lift to allow turning an electric wheelchair inside lift
- e) 300mm space on leading edge of each door throughout development
- f) 1800mm wide communal corridors with wheelchair passing places incorporated into design
- g) It is also confirmed that the internal floor area of each apartment is at least 10% above the relevant minimum floor area as per the Apartment Guidelines

In addition to the apartment block modifications, an Electric Wheelchair Charging facility is provided adjacent to the Community Facility and Bin Store block with independent entrance. For full details see architectural drawing no. RATH A2-20.

The accessible features of each apartment have been clearly annotated on architectural drawing nos. RATH A2-30, RATH A2-31, RATH A2-32, RATH A2-33. The drawings show adequate space is provided in each apartment to accommodate wheelchair turning circles in each room. It is

considered that the architectural design of the Proposed Development with the above modifications provides for universal accessibility to the greatest extent possible.

7.0 Item 6: Surface Water and SuDS

Clarification Item 6 stated and sought the following:

The applicant is requested to submit revised information based on the following:

"A. The applicant states a soakaway would be provided, noting a Wavin Aquacell attenuation area to the south of the site. It is not clear therefore that this is a soakaway. Soakaways are not generally permitted for apartments because soakaways must be individually owned and not shared – the applicant is requested to clarify what is meant by soakaway at this location and satisfy themselves that the proposal is in accordance with the SDCC SuDS Guidance Document

B. In exceptional circumstances underground attenuation systems are permitted but only if there is insufficient attenuation provided by SuDS (Sustainable Drainage Systems). The applicant is required to seek alternative attenuation solutions or provide a robust rationale for the provision of concrete underground attenuation at the site.

C. The applicant is to submit a drawing and report showing a flow route analysis of existing site. The development of the surface water flow routes throughout the site should correlate as closely as possible to the natural flow of surface water on site.

D. Submit a drawings showing all SuDS systems in plan and cross sectional view. Show the treatment train and conveyance of surface water above ground over the site. Show the capacity in m3 of proposed SuDS systems.

E. The use of concrete attenuation tanks is heavily discouraged by SDCC Drainage section. The applicant is required to submit a drawing and report providing alternative means of attenuating surface water through the use of Sustainable Urban Drainage Systems features. SuDs features could include but are not limited to: a. Green Roofs; b. Blue Roofs; c. Swale; d. Tree pits; e. Grasscrete; f. Raingardens Biodiversity areas; g. Detention basins; h. Green areas and i. Other such SuDS.

"F. The applicant is required to submit a drawing and report which give greater detail regarding the attenuation capacity provided on site. Details required will include the proposed attenuation capacity provided by drainage features given in units of m3. If 129m3 surface water attenuation is provided then the attenuation provided is undersized by approximately 300%. Any report and drawings submitted should show where and how much (in m3) surface water attenuation is provided on site. Prior to submission of revised drawings and reports contact water services in South Dublin County Council to discuss same."

The enclosed CORA AI Response Letter provides a detailed response to Item 6 including drainage calculations which should be read alongside the enclosed Engineering drawing pack. In response to Item 6, the following changes have been made to the design of the Proposed Development:

1. A new 1,120 sqm green roof is proposed on the apartment building which equates to c. 77% green roof coverage for the development. The green roof is reflected in the revised architectural and landscape drawing packs.

2. The design of the soakaway being provided as part of the SUDs strategy has been revised from Aquacell units to a Stormtech system at the request of South Dublin County Council.

The Green Factor Calculation has been revised to account for the new green roof area. As a result of this change the GI Score for the Proposed Development has increased from 0.52 previously to 0.72 which should be considered as a material improvement in the performance of the scheme as assessed under the SDCC Development Plan.

8.0 Conclusion

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

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

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

We trust that the enclosed plans and particulars are in order and look forward to receiving acknowledgement of this submission in due course. However, should you have any queries on the enclosed pack, please do not hesitate to contact the undersigned.

Yours faithfully,



Alan Crawford
Associate Director
KPMG Future Analytics
Chartered Town Planning and Development Consultants