



24th April 2023.

Land Use, Planning & Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC



Re:

**Permission sought for Residential Development at
Lucan Newlands Road / Esker Hill, Lucan, Co. Dublin,
for Nacul Developments Ltd.**

ADDITIONAL INFORMATION

REF. SD22A/0390

Dear Sir/Madam,

1.0 Introduction

On behalf of our client, Nacul Developments Ltd., we wish to respond to your letter dated 7th December 2022, requesting Additional Information (hereafter "AI") in respect of a proposed development, under planning application Ref. SD22A/0390, proposing a residential development consisting of 7 no. dwellings on a site of c.0.3 hectares, located at a site known as "Clonbrone", on Lucan Newlands Road / Esker Hill, Lucan, Co. Dublin, K78 Y5C2. Our response to same is set out below.

2.0 Additional Information Response:

The following sets out the items that require AI and our response to same.

1. Architectural Revisions

The Applicant is requested to provide revised Site Layout, Plan, Sectional, Elevational and Contiguous Elevational drawings of the proposed development, which demonstrate the following revisions:

- (i) *Re-site proposed House no. 7 to increase the separation distance between this dwelling and existing houses to the east.*



Response 1 (i):

Crean Salley Architects (CSA) have prepared the submitted drawing no. 85675-RFI-004 which illustrates that the proposed house no. 7 and its separation distances between itself, and the existing housing located to the eastern boundary. As previously submitted at planning stage (figure 1 below), proposed house no. 7 was at a separating distance between c. 18.6 – 22.7 metres away from the existing houses to the east. The submitted revised site layout plan (drawing no. 85675-RFI-004) of the proposed development illustrates that the separation distance between proposed house no. 7 and the neighbouring houses to the east has been increased to c. 20.1 – 24.2 meters. The purpose being that house no. 7 is pulled back from the neighbouring boundary to the east with the current side gable of the proposed dwelling no. 7 being a further c. 2 meters away from the rear of its nearest neighbour. This is due to a revision whereby the widths of the proposed houses have been reduced by 125mm, and the separation distance between the proposed houses being reduced from 2,500mm to 2,350mm. This allows houses 2 to 7 to migrate towards house 1, giving greater separation of 1,475mm laterally to the houses in Esker Lawns to the east. In addition, CSA have prepared the enclosed drawing no. 85675-RFI-030 that details the proposed north elevations of the proposed development and proposed house no.7 and its separation distance between the existing neighbouring Esker Lawns housing to the east – please refer to same.

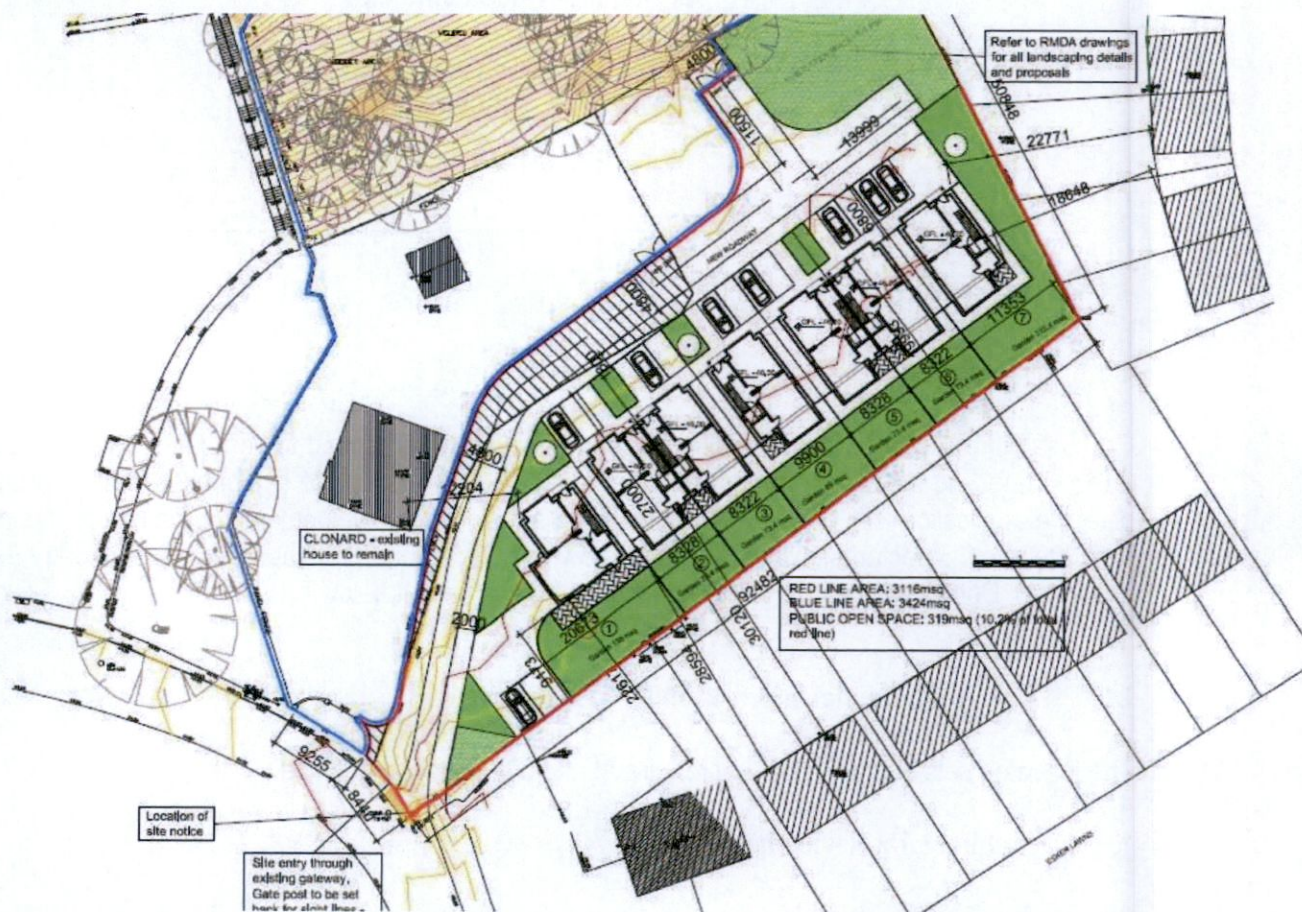


Figure 1: Site Layout Plan Submitted at Initial Planning Stage (prepared by CSA)



(ii) *Provide revised Site Layout drawings which accurately reflect the existing receiving context of the subject site to include any extensions to adjacent dwellings.*

Response 1 (ii):

Please refer to the submitted Crean Salley Architects (CSA) drawing no. 85675-RFI-004 "Site Layout Plan – Proposed" which illustrates the extensions to the neighbouring dwellings.

(iii) *Re-design the proposed vehicular access junction layout, having regard to the proposed Grand Canal to Lucan Urban Greenway scheme. In re-designing the proposed vehicular access, the Applicant should liaise with the Roads Department of South Dublin County Council.*

Response 1 (iii):

The project consulting engineers Downes & Associates have listed with Mr. John McGee of the South Dublin County Council (SDCC) Roads Department regarding this matter, and accordingly have prepared the enclosed drawing no.s 5006, 5007 & 5009 - please refer to same. In relation to the proposed Grand Canal to Lucan Urban Greenway, details of same are shown on the enclosed Downes & Associates drawing no. 5009, along with the entrance details to the proposed development to illustrate that the proposed development will have no impact on a future greenway.

(iv) *Having regard to the potential impact of the proposed development on the arboreal footprint of the subject site, it is considered that the proposed planting is insufficient to mitigate the loss, for example there are no street trees. In this regard, the proposed Site Layout and Landscape Plan should be revised to make every effort to retain existing trees and incorporate planting to mitigate the loss of existing trees.*

Response 1(iv):

Please refer to the enclosed Ronan Mac Diarmada + Associates (RMDA) Landscape Architects drawing no. 1576A "Landscape Plan" which details the proposed landscaping, including tree and hedge planting for the proposed development. Street trees are proposed along the right hand side of the entrance road, as well as tree planting inside the main entrance on the right hand side.

An existing wooded area is located north / northwest of the proposed development, which does not form part of the subject application site and therefore no changes to same are proposed. It is our understanding that the adjoining landowner privately maintains this wooded area and the proposed development does not seek to alter same. The proposed development facilitates pedestrian access to this wooded area, however, this is subject to agreement with the adjoining land owner.

The proposed public open space located in the north / northeast of the site will include a grass area with a new gravel path. The design will include shrub and hedge planting along the boundary to the north / northeast of the site. The space will include outdoor seating which welcomes future residents to utilise the space, as well as tree planting.

The proposed development will introduce trees of various types located at the entrance to the site. The proposed access road will be aligned with multiple street trees, shrub planting and hedgerows leading to the public space area at the north- east / east of the site. A line of proposed tree planting and hedgerows will be incorporated into the south / southeast of the site boundary. This ensures privacy and screening to the existing adjoining properties located to the south / southeast boundary. Please refer to the enclosed Drawing No. 1576A prepared by Ronan Mac Diarmada + Associates with a full planting list schedule on the submitted RMDA Landscape Plan, a total of



66 no. trees are proposed to be planted, in addition to the 21 no. trees are to be removed. A total of 66 metres of hedge is going to be removed while introducing 290 linear metres of hedging throughout the site.

2. Traffic measures

- (i) *The Applicant shall submit a revised layout of not less than 1:200 scale, showing:*
- *The proposed access junction layout in relation to the proposed Grand Canal to Lucan Urban Greenway scheme.*
 - *The speed limit sign relocated away from the access point so as not to create a traffic hazard.*
 - *The removal/relocation of the telecom utility box and pole away from the access to a suitable location.*

Response 2(i):

Please refer to the enclosed documents and drawings prepared by Downes Associates Consulting Structural & Civil Engineers:

- We submit Drawing No. 5009 which illustrates the proposed access junction layout in relation to the proposed Grand Canal to Lucan Urban Greenway Scheme. The drawing shows the linkage between the proposed development and the proposed greenway scheme on the Lucan -Newlands Road. The scheme includes an upgraded shared street which consists of a car share, bicycle lane and upgraded pedestrian paving linking into Brookvale Park, north-west of the subject site. Downes Associates have discussed this matter with Mr. John McGee of the Roads Department of South Dublin County Council.
 - In response to traffic hazard measure, we submit Drawing No.s 5001 & 5007, prepared by Downes Associates which illustrate the location of the road safety signage and markings for the development. These include a "Caution – Children At Play" sign located at the entrance of the proposed site, which will be set in place to protect future residents within the proposed development. A "30km Speed Limit" sign will be introduced to control the speed of private vehicles within the development thus creating a safe street for residents and complying with traffic calming measures as per SM6 Objective 10 of the South Dublin County Development Plan 2022-2028. A "T-Junction" sign will be erected for the safety of vehicles when approaching the proposed junction. A "STOP" sign will be provided at the proposed junction to warn vehicles to stop and avoid traffic hazards near the site. A priority controlled stop junction road marking will be introduced at the access of the proposed development.
 - Drawing no.s 5001 & 5006 , prepared by Downes Associated detail the removal and relocation of the telecom utility box and pole away from the proposed access as requested, please refer to same. The applicant has also engaged with Eir, the owner of the utility box, and subject to the applicant paying the costs associated with any necessary relocation of same, there is no objection in principle to the relocation of the box – refer to enclosed letter from Eir.
- (ii) *The Applicant shall submit a revised Road Safety Audit which takes account of the revisions to the proposed Site Layout.*

Response 2 (ii):

Downes & Associates, Consulting Engineers have liaised with Mr. John McGee of the SDCC Roads Department and it has been confirmed that a revised Road Safety Audit is not required as there is no redesign of the junction.



3. Landscape Visual Impact Assessment

Provide the following to facilitate a complete assessment of the potential visual impact of the proposed development:

- (i) *Provide a Landscape Visual Impact Assessment of the proposed development, to be carried out by an appropriately qualified consultant.*

Response 3 (i):

A "Townscape and Visual Impact Assessment" has been prepared by Macroworks, a qualified consultant. The enclosed LVIA assesses the proposed development consisting of the demolition of an existing dwelling and replacement with 7 no. two storey dwellings and associated site development works at Clonbrone in Lucan Village, Co. Dublin. The enclosed document finds that the proposed site is being contained in the "Urban Fringe / Periurban Landscape Character Type". The subject site is in close proximity to the "Historical Urban LCT associated with the core of Lucan Village". The LVIA has also identified the subject site within a "geographically specific landscape character area" such as the LC1 Liffey Valley LCA.

Section 3 of the report includes a "Townscape Impact Assessment" that details the impact of the proposed development to the land use zoning which concludes that the development "*will not adversely impact the wooded open space to the north / northwest of the site and take advantage of the sylvan setting*". This section also concludes that the proposed development "*is not considered to have any material detrimental impact on the landscape of the open space or the visual amenity*" in relation to the location of the subject site.

Section 4 of the report identifies 6 no. viewpoints (VP) that cover a range of angles, distances and context surrounding the subject site. This section gives detailed information relating to each viewpoint, its receptor sensitivity and the significance of visual impact in view of the proposed development. Please refer to the enclosed report for further information of same.

Macroworks concludes in the townscape and visual impact assessment that the "*proposed development will not result in any significant townscape or visual impacts and is considered to be appropriate scale and design for the site*".

Please refer to the submitted "Townscape and Visual Impact Assessment", prepared by Macroworks for more details.

- (ii) *Provide contiguous elevations of the proposed development to include adjacent dwellings.*

Response 3 (ii):

We submit the following Drawing No. 85675-RFI-030 "Site Elevations" prepared by CSA detailing revised contiguous elevations of proposed development and its relationship with the adjacent dwellings located to the south / southeast and east of the site boundary. It is illustrated that the proposed development has been carefully positioned to avoid overlooking and overshadowing to the existing properties. The design of the proposed dwellings respects the privacy and security of the existing dwelling thus introducing appropriate screening through proposed tree planting to the rear of each proposed private amenity space.



4. Sustainable Drainage Measures

(i) The proposed attenuation provided of 30m³ is undersized by approximately 75%. The applicant is required to submit a revised drawing and report showing additional surface water attenuation provided by means of SuDS systems (Sustainable Drainage Systems). SuDS features could include but are not limited to Permeable paving and Other such SuDS.

Response 4 (i):

In response to Item 4(i), Downes Associates state that a stormwater modelling analysis has been undertaken where calculations and results of same are included in the previously submitted planning stage report. The enclosed cover letter prepared by Downes Associates asserts that "this accounts for the volume of storage achieved via surcharging of the underground network and also includes the volume of both the swale and the underground attenuation tank". To conclude, Downes Associates do not agree that the attenuation is undersized.

(ii) The use of concrete attenuation tanks is not accepted by SDCC (South Dublin County Council) Drainage section. The applicant is required to submit a drawing and report providing alternative means of attenuating surface water through the use of an arched type of attenuation system or equivalent.

Response 4 (ii):

In response to Item 4 (ii), we refer the Planning Authority to Drawing No. 5008, prepared by Downes Associates which details the proposed arch type of attenuation system.

5. Green Infrastructure (GI)

(i) Provide a Green Infrastructure Plan (to be coordinated with the proposed Landscape Plan and SuDS Plan) that 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 steppingstone.

Response 5 (i):

A "Green Infrastructure Plan" (GI Plan) has been prepared by RMDA (please refer to submitted A3 booklet). The GI Plan includes several objectives set out by RMDA in relation to the protection and restoration of existing on-site GI assets. The GI plan includes a map of "existing GI in the area" which details the existing green infrastructure on-site and surrounding the proposed development. Objectives set out by RMDA include the connectivity to the surrounding GI corridors and introduces linkages to act as steppingstones throughout the site and further connects the surrounding green infrastructure. A map is provided in the GI Plan titled "GI in our site" detailing the green infrastructure in and around the proposed development. The map shows the secondary green linkages within the proposed site to the strong green buffer (wooded area) north / northwest outside of the site. The site will introduce public street trees and "Miyawaki" areas to contribute to the local GI corridors surrounding the site.

The GI Plan includes details of SuDs incorporated into the proposed development via permeable paving through the proposed pedestrian paving and car parking spaces. This section includes the provision of 2 no. trees requiring a tree pit thus contributing to SuDs standards within the proposed development.



(ii) A query arises in relation to the calculation method for the Green Space Factor Worksheet provided by the Applicant, in particular it is noted that the arborists report shows one tree being protected whose canopy lies partly within the site, yet a proposed surface area of 695m² is shown for preserved trees. The Applicant is therefore requested to provide a revised Green Space Factor worksheet which provides an accurate calculation of the greening factors on the subject site.

Response 5 (ii):

Please refer to the enclosed "Additional Information" document (A3 booklet) prepared by RMDA. A revised "Green Space Factor Worksheet" has been provided within same which includes a green factor numerator of 0.5 within the proposed site. This is calculated through two no. plans, the first being at the initial stage where new trees are proposed and the second being shown after 2 years when the trees are established and existing.

3. Conclusion & Request that Permission be Granted

3.1 This application for permission proposes the development of 7 no. dwellings on lands zoned objective RES: "To protect and/or improve residential amenity", therefore, the principle of the proposed development is acceptable. The proposed development has been designed in accordance with the policies and objectives of the South Dublin County Development Plan in order to provide for traditional family housing that is compatible with the land use zoning objective attached to the site and is of a scale that maintains the established character of the receiving environs.

3.2 The type and scale of development put forward for permission has been judiciously considered in terms of the planning history attached to the site, the receiving environs, the character of the area and the size, configuration and orientation of the site. A high quality of architecture has been applied to the scheme, with the submitted verified views and the townscape and visual impact assessment confirming that the proposed development will not result in any significant townscape or visual impacts and is considered to be appropriate scale and design for the site.

3.3 Sufficient public and private open space has been provided thus catering for good quality, residential amenity. The proposed dwellings are also sufficiently separated from adjoining properties thus ensuring existing and future residential amenity for all.

3.4 We consider that the proposed development is a reasonable proposal for the subject site, considering its size, the size and scale of other dwellings in the immediate environs, the SLO for the protection of views on the site to the west and the traditional pattern of development in this area. It is evident from all of the details contained in this planning application that the proposed development will have no impact on the environment or any adjoining dwellings through its scale, sympathetic design and setbacks. We are satisfied that the development is acceptable in terms of use, residential density and design and complies with the policies and objectives of both the South Dublin County Development Plan 2022-2028 and the Sustainable Residential Development in Urban Areas Guidelines 2009, along with the best principles of urban design.

3.5 Having regard to the policies and objectives of the Development Plan, the land use zoning of the site, the pattern of permitted development in the area, and the scale and design of the proposed development, it is put forward that the permission being sought is acceptable, will not impact on the character of the receiving environs, will have no impact on existing residential amenity in the area and is in accordance with the proper planning and sustainable development of the area.



3.6 We consider that all the items that required Additional Information have been fully addressed. We trust that the Planning Authority will give due consideration to the merits of the subject application, and we look forward to a favourable decision in due course. Please refer to the pages over for a full list of enclosures.

Yours faithfully,

A handwritten signature in blue ink that reads "Tracy Armstrong". The signature is written in a cursive style and is positioned above a horizontal line.

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



Enclosures:

We enclose six copies of the following in support of this submission of Additional Information:

Prepared by Crean Salley Architects (CSA):

Drawing/ Document No.	Title	Scale
85675-RFI-004	Site Layout Plan Proposed	1:500 @ A3
85675-RFI-010	House 1 – Plans	1:100 @ A3
85675-RFI-011	House 1 – Section & Elevations	1:100 @ A3
85675-RFI-012	House 2 & 5 – Plans	1:100 @ A3
85675-RFI-013	House 2 & 5 – Section & Elevations	1:100 @ A3
85675-RFI-014	House 3 & 6 – Plans	1:100 @ A3
85675-RFI-015	House 3 & 6 – Section & Elevations	1:100 @ A3
85675-RFI-016	House 4 – Plans	1:100 @ A3
85675-RFI-017	House 4 - Sections & Elevations	1:100 @ A3
85675-RFI-018	House 7 – Plans	1:100 @ A3
85675-RFI-019	House 7 - Sections & Elevations	1:100 @ A3
85675-RFI-030	Sections Elevations	1:100 @ A3

Prepared by Downes Associates Consulting Structural & Civil Engineers:

Drawing/ Document No.	Title	Scale
20047	Civil Engineer Response for Request for Additional Information	A4 Report
5001	Proposed Site Layout and Water Services	1:250 @ A1
5004	Proposed Swept Path Analysis Refuse Vehicle	1:250 @ A1
5005	Proposed Swept Path Analysis Fire Tender	1:250 @ A1
5006	Proposed Sightlines & Entrance Works	As Shown @ A1
5007	Proposed Signage & Road Markings	1:250 @ A1
5008	Attenuation Details	NTS @ A0
5009	Proposed Site in Context of Future Planned Greenway	1:250 @ A1

Prepared by Ronan Mac Diarmada + Associates Ltd:

Drawing/ Document No.	Title	Scale
N/A	Additional Information	A3 Document
N/A	Green Infrastructure Plan	A3 Document
1	Landscape Plan	As Shown @ A1

Prepared by Macroworks:

Drawing/ Document No.	Title	Scale
N/A	Townscape and Visual Impact Assessment	A4 Report

Prepared by Eir:

- Cover Letter

A