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The Secretary
Planning Department
South Dublin County Council
County Hall

9 May 2023

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**HW Planning** 

5 Joyce House, Barrack Square, Ballincollig, Cork P31 KP84

www.hwplanning.ie info@hwplanning.ie +353 (0)21 487 3250

Company Reg. No. 486211

Accreditations ISO 9001:2015 ISO 14001:2015 ISO 45001:2018 Re: South Dublin County Council Planning Reference: SD22A/0401

Demolition of existing shed structures, retention and conversion of Scholarstown House (Protected Structure) into two residential units, construction of an apartment block ranging in height from 3 to 5 storeys containing 74 apartment units and all anciallary works nessecary to facilitiate the development at Scholarstown House, Scholarstown Road, Dublin 16.

Dear Sir/Madam,

We act on behalf of Emmaville Limited, who wish to respond to a Request for Further Information (RFI) dated 15<sup>th</sup> December 2022 regarding the above proposed development. The following are the plans and particulars that accompany this response:

- 6 no. copies of this cover letter prepared by HW Planning;
- 6 no. copies of the Childcare Assessment prepared by HW Planning;
- 6 no. copies of the revised Architectural Drawings prepared by C+W O'Brien Architects;
- 6 no. copies of the RFI Response prepared by C+W O'Brien Architects;
- 6 copies of the updated Landscape Plan prepared by Cunnane Stratton Reynolds;
- 6 copies of the LVIA Addendum prepared by Cunnane Stratton Reynolds;
- 6 copies of Photomontages prepared by 3DDB;
- 6 copies of Daylight/Sunlight Assessment prepared by 3DDB;
- 6 no. copies of the revised Engineering Details prepared by Horgan Lynch Consulting Engineers; and,
- 6 no. copies of the revised Traffic Engineering Details prepared by Martin Hanley Consulting Engineers.

In the interests of clarity, we will address each of the matters raised in the order in which they appeared in the letter dated 15<sup>th</sup> December 2022.



# 01. Site Zoning

The applicant is requested to submit additional information to clarify the land use zoning of the site. The existing and proposed site layouts and boundaries should be overlayed with the SDCC County Development Plan 2022-2028 zoning maps.

A drawing has been prepared by C+W O'Brien (Drawing No. PE21023-CWO-ZZ-ZZZ-DR-A-0045) which overlays the application boundary with the zoning objectives of the site. We can confirm that the site is primarily zoned 'RES' – Residential with a small sliver of land to the east zoned 'OS' – Open Space which does not form part of the residential element of the development.

#### 02. Impact on Scholarstown House

The applicant is requested to submit additional information addressing the following concerns of SDCC's Architectural Conservation Officer:

(a) The majority of the work appear to have modest/minimal impacts. However, there are some areas of alterations and revisions to the original layout and insertion of additional services where negative impacts are likely.

The following items need to be addressed: -

- -It is considered that where original windows are proposed to be blocked up alternatives should be considered, or alternative designs considered in order to provide a solution and the retention.
- Removal of original architectural features is not acceptable and where this has been indicated, mitigation measures or alternative floor plans should be provided in order to negate the removal of architectural features.
- -Where additional services are proposed details shall be provided on how services i.e., bathrooms and w/c will be integrated and how these will be ventilated etc.
- The Conservation Methodology provides details on the architectural elements for repair which is very helpful in directing the works in accordance with best conservation principles and practice.

There are no details included on any proposed energy efficiency works to the protected structure. Clarification should be sought with regard to any such works.

It is considered that in addition to the Conservation Methodology a Schedule of Works should be provided for each floor in order to specify all the works to include; interventions/revisions, conservation repairs and routine maintenance. A Schedule of Works and Method statement for the specific elements should also include how the items listed above will be dealt with as part of the entire scope of works to the protected structure.

Amendments have been made to the proposed development in order to ensure that as much of the original fabric of the building is retained. The changes made to the design include the reconfiguration of the floor plans to allow for the retention of the original window openings in the rear return (3 storey extension) which will allow light to penetrate into the proposed stairwell. All



other interventions to the protected structure are unchanged from the original design. Please refer to the *Built Heritage Response* prepared by John Cronin and Associates for further information.

In relation to measures to improve energy efficiency, the following interventions are proposed:

- Historic timber sliding sash windows (not modern replacement), while not of remarkable
  historic significance, will be refurbished and upgraded to hold slim, double-glazed units
  (<12mm thickness) with discreetly installed draft-proofing in accordance with the previously
  submitted conservation methodology.</li>
- It is proposed to replace the existing ground floor with an insulated concrete slab containing all required service ducting for the ground floor-level in order to minimise the chasing of masonry walls to bring services down from the first floor-level.

These works are considered acceptable given they are reversable should the building ever revert back to use as a single dwelling, which is considered best practice in terms of the conservation of protected structures.

A schedule of works for the installation of services and interventions has also been prepared by John Cronin and Associates and is included in Appendix 1 of the submitted *Built Heritage Response*.

(b) On assessing the existing Outbuildings and details provided, it is felt that the Building D should be re-examined with regard to its retention and adaptive reuse as part of the overall development. It is considered that the retention of an original early 19th century outbuilding would provide additional architectural interest and character to the site and will support the association with Scholarstown House and the overall setting of the original site. The original outbuildings should be considered with regard to possible retention for reuse or using the footprint and architectural elements of the outbuildings in the design of the new build allowing a sensitive building type and visual link and association with the Protected Structure.

We note the concerns of the Council with regard to the retention of the existing outbuildings on site. However, following heritage investigation studies for the re-development of the site, it is considered that as the buildings have been extensively altered over the years, such that there is little merit in retaining these on site.

The project Architects C+W O'Brien have however, in the revised design ensured that elements of the outbuildings are incorporated into the fabric of the new building. This will provide for a visual link and association with the Protected Structure and the sites past by where it was in use as a farm. Selected use of corrugated sheeting has been incorporated into the overall design which will have a positive impact on the setting of the protected structure which is considered acceptable at this location.

(c) Although separation has been provided in providing limited but designed setting to the Protected Structure, it is considered that by virtue of the height of the proposed apartments the Protected Structure is completely overshadowed. The mass and scale



of the apartment block which completely surround the Protected Structure to the rear as a backdrop and to the side, is overbearing and causes negative visual impacts. In order to less the visual impact the overall height, scale and mass of the 5 storey element needs to be reduced and overall design revised.

(d) It is considered that the overall design, mass and height should be reconsidered and revised in order to find a greater balance between the existing and new development. It is noted that the height has been reduced where the new block forms a backdrop to the protected structure, however, not enough has been done in relation to the overall design to the adjoining block to provide a building type that doesn't completely overshadow and dominate the entire site.

In response to points 2 (c) and (d) please refer to the RFI Response prepared by C+W O'Brien Architects. The proposed apartment building has been re-designed to ensure that there is no impact on the setting of the protected structure, and the materials have been updated to further reduce the perceived massing of the building. The changes made to the overall design of the apartment block in response to this point is outlined below:

- Reduced massing to rear/west of Scholarstown house including the further set back of the 4th floor and stepping back of the third floor element.
- Reduced massing to south of Scholarstown house including further set back of the 4<sup>th</sup> floor element at this location and the removal of bay windows on the 3<sup>rd</sup> floor.
- Use of an alternative façade material<sup>1</sup> in order to reflect on the sites historic use as a farm.

The revised design was shared with the Council's Heritage officer on the 6th of March 2023, prior to the submission of the RFI response, who confirmed that it consisted of an improved and satisfactory response to the setting of Scholarstown House.

It is considered that the proposed building forms and heights respond to the varying site setting elements resulting in the protection of the vista to the front of Scholarstown House, the creation of a suitable backdrop to Scholarstown House which allows the protected structure to stand out amongst the wider site context and the creation of a new urban edge which respects the building heights of the surrounding properties. Through the consideration and design evolution of the proposed development, the scheme has been carefully considered and to ensure a gradual and appropriate increase in massing and articulation of form is achieved between the three storey block to the eastern side and the four storey with fifth storey set back level to the western side creating an urban edge onto Orlagh Grove road which is considered acceptable for the redevelopment of this site.

(e) As previously advised during pre-planning discussions the block form needs to be broken up in different heights and different treatments with some separation between to provide separate block forms. The outbuildings should be considered with regard to adaptive reuse and reflecting the outbuildings in the design ethos of one or two blocks or using the original footprint to provide additional new building where the existing corrugated shed is located. The elevational treatment and materiality should reflect a

<sup>&</sup>lt;sup>1</sup> Metal cladding.



more rural and agricultural style of building type that would connect visually to the existing protected structure and provide high quality design and character to the site.

In response to this point, a number of design changes have been made in order to break up the built form of the proposed apartment block. The changes now proposed include the following:

- The use of variety of material finish to different facade elements offers the visual connection from new and old. The corrugated iron cladding of the old agricultural buildings reinterpreted into the facades of the new building creating a resonance with the past.
- The recess of the block form to the junction of the three storey block and the four storey block in combination with a change of facade material creates a visual break offering the view of separate block forms. The location of this recess and materiality change also aligns with the front elevation of the existing Scholarstown house offering a pleasing alignment and respect of the existing house central within the composition.

It is considered that these changes respond to the requests of the Council, and in turn enhance the high-quality design of the proposed development which respects the character of Scholarstown House.

## 03. Density

(a) The submitted Housing Quality Assessment states that the site area used to calculate residential density includes the letter of consent areas. This includes the public footpath along the eastern and northern boundaries of the site, which should not be included in the net developable area. The applicant is requested to advise the net developable area of the site and based on this, the proposed net residential density.

In response to this point, the residential density has been re-calculated to exclude the public footpath as requested and is included in the updated Housing Quality Assessment prepared by C+W O'Brien. The density calculated using the net developable area have been calculated at 102 units per hectare which is only slightly above the figure of 96 units per hectare which was calculated based on the gross developable area.

(b) The revised proposed development submitted in response to other additional information items herein may lower the net residential density. Additional consideration of the proposals with reference to Appendix 10 Building Height and Density Guide of the County Development Plan is warranted.

The proposed development has been assessed against the guidance included in Appendix 10 and Density Guide as included in the County Development plan 2022-2029 and a response to this is included in the submitted RFI Response prepared by C+W O'Brien Architects<sup>2</sup>.

<sup>&</sup>lt;sup>2</sup> Pages 12-15.



## 04. Housing Mix

The submitted Statement of Housing Mix references the permitted development of 590 residential units to the north-east of the site, ABP Ref. TA06S.305878. This permitted development should be taken into consideration in the assessment of dwellings by number of rooms within 1km of the subject site. It is noted that this assessment is based on CSO 2016 census data. Further consideration should be given to permitted development in this assessment. A revised statement should be submitted addressing this.

Please find enclosed an updated Statement of Housing Mix prepared by HW Planning which has been updated to include further assessment of the 590 units under construction to the north-east of the site (Two Oaks Development). Please note that due to the Census 2022 data not being fully available at the time of updating this report, it has been updated where possible using the 2022 data, but still includes assessment under the 2016 data where the 2022 data is still not available. It is further noted that the Council's own HNDA for the recently adopted Development Plan is based on 2016 census data.

In any case, it is still concluded that due to the prevailing unit types located in the area including those under construction to the north-east of the site that the housing mix as proposed is appropriate at this location, and that the number of 3 bedroom units proposed is acceptable given the site context and the wording of policy H1 Objective 12 which states that proposed unit mix should meet the specific demand required in the area.

#### 05. Architecture

The applicant is requested to submit a revised proposed development addressing the following:

(a) The approach to height should be reconsidered in relation to impact on the Protected Structure and residential amenity. The Planning Authority would have concerns about where within the site, taller elements are proposed. The four storey element would be less than 1m from the south-western boundary, adjoining RES zoned lands. Windows to habitable rooms would be in close proximity to this boundary. The applicant is requested to submit a revised design at this boundary, including providing an increased separation distance of the higher elements of the building from this boundary and improved boundary treatment, to help mitigate any overbearing impact.

We note the concerns of the Council with regard to the residential amenity and impact on the protected structure. The design has been updated to increase the separation distances from the south western boundary to a minimum of 4m at second and third floor level. In addition, the building form has been further stepped back and this combined with the inset brick detail and opaque windows offers further articulation to this elevation and reduces the perception of any overbearing, which is considered acceptable.

With regard to the proximity of the proposed development to the south western boundary, the project Architects C+W O'Brien have prepared a sketch masterplan 'Potential Future Condition'



illustration and 3D massing which illustrates how the adjoining site could be potentially developed in the future and the application Scholarstown House without the need to greatly alter the proximity of the development at this location. We note that the units to the east are currently in commercial use, and have no associated amenity areas, nor are there any windows on the east façade which look out towards the proposed development. The development as proposed, provides a strong response to both the current condition of the two storey with pitched roof buildings while providing a strong precedent for future development of these lands. It is likely that any future development of these lands will propose to bring forward the building line to ensure that the site is developed in an efficient manner. It is therefore considered that the proposed development will not have an impact on the future development potential of the lands to the south, as to do so will weaken the street frontage onto Orlagh Grove and will reduce the design quality of the overall scheme where the intention was to create a strong urban street edge at this location.

(b) The ground floor terraces for Apartment Nos. 0008 and 0009 are not considered to be afforded sufficient privacy. An appropriate boundary and/or 'privacy strip' to these terraces should be provided to ensure privacy.

A privacy strip has been included to the south facing terrace of units 0008 and 0009 along the boundary with the adjoining footpath and also dividing the private open space of each of the two units. The privacy strip will provide a 1.5m opaque glass barrier with climbers in front to provide sufficient privacy while not blocking sunlight to the terrace space. Please refer to the Landscape Masterplan (Drawing No. 22159-2-100) prepared by Cunnane Stratton Reynolds Landscape consultants for further details.

(c) No analysis of the proposed development in relation to the Childcare Facilities Guidelines for Planning Authorities (2001) has been provided.

As the amended proposal is for 72 apartments, the proposed development does not meet the criteria by where a Childcare Facility needs to be provided on site. We note that the Apartment Guidelines (2022) exclude in whole 1-bedroom units and in part 2-bedroom units when calculating childcare provision needs, therefore excluding all 1-bedroom units in the scheme, only 42 no. units of a total of 72 no. units can be deemed to generate childcare demand which is significantly below the threshold.

Nevertheless, a Childcare Demand Assessment has been prepared by HW Planning which concludes that there is sufficient capacity in the existing and proposed creches within 1.5km of the site to accommodate any requirement for childcare generated as a result of the proposed development.

(d) Any revised design to Scholarstown House should be assessed in terms of daylight/sunlight accessibility. The proposed apartment building may need to be revised in relation to sunlight/daylight impact on Scholarstown House and its proposed gardens.

A Daylight/Sunlight Assessment has been prepared by 3DDB which assesses the impact of the updated apartment block design on Scholarstown House. This report concludes the following in relation to daylight:



"The results have shown that most of the spaces of Scholarstown House would not meet the BRE Guidelines in its existing state. This is mostly due to the historical nature of the structure, which presents features that limit the amount of natural light that can penetrate the interior. In the proposed state a reduction in the levels of daylight, particularly within the single aspect rooms facing the proposed apartment building to the South, has been recorded. Efforts have been made to modernise the interior of the house while preserving its historical integrity as a protected structure. Whilst the increasing of the glazing is not a feasible option to increase daylight levels in the units, the internal re-arrangement of the spaces has shown daylight improvements in certain instances."

It is considered that the Daylight and Sunlight received into the units proposed in Scholarstown House are acceptable given its protected structure status, and the need to minimise any interventions to the existing window openings. The proposed apartment block has been stepped back further to allow for further daylight penetration into Scholarstown House, which will ensure that the conversion of this house into 2 no. apartments will ensure the longevity of the use of the house for residential purposes. There will therefore be no perceptible impact on Scholarstown House arising from the proposed development in terms of Daylight/Sunlight.

## 06. Landscape and Ecology

(a) Given the extent of existing trees and vegetation onsite and the number proposed for removal, the applicant is requested to assess the full ecological impact assessment of the proposed development as appropriate. This might include a breeding bird survey and other assessments.

An Ecological Impact Assessment (EcIA) has been prepared by Alternar Marine and Environmental Consultants to assess the full ecological impact of the proposed development on the site.

This report concludes:

"It is considered that cumulative effects on biodiversity, with other existing and proposed development in proximity to the application area, would be unlikely, neutral, not significant and localized. It is concluded that no significant effects on biodiversity will be seen as a result of the proposed development alone or in combination with other projects."

We note the above request states that additional survey work might include breeding bird survey. The issuance of the RFI request did not correspond with an appropriate season for such survey work to be completed<sup>3</sup>. Notwithstanding this, we can confirm that this survey work has now commenced to coincide with the appropriate survey period. The applicant is happy to furnish the Council with a copy of this survey work once complete which can be secured by way of applied planning condition. Based on the site walkovers undertaken to date by the project Ecologist, nothing has been identified which would preclude a grant of planning permission.

<sup>3</sup> And having regard to the associated statutory RFI response period.



(b) Additional tree planting should be provided as part of the landscape proposals in order to ensure that there is a positive net gain in terms of new tree proposed compared to those being removed. As a minimum existing tree lost should be replaced on a 3:1 ratio basis. Full details of all proposed tree planting should be provided on a detailed planting plan. This planting plan will include planting and maintenance specifications, including cross-section drawings, use of guards or other protective measures and confirmation of location, species and sizes, nursery stock type, supplier and defect period.

Cunnane Stratton Reynolds, the project Landscape Architects engaged with Oisin Egan of SDCC Parks department on the 11<sup>th</sup> January 2023 to discuss the net gain to make up for the shortfall of proposed tree removal necessary to facilitate the proposed development. It was clarified by SDCC that for every tree removed on site the Council would require tree planting at a ratio of 3:1 and should this not be possible due to site constraints, that such compensatory planting may be provided offsite.

The revised Landscape Masterplan prepared by Cunnane Stratton Reynolds (Drawing No. 22159-2-100) clearly indicates the proposed tree quantities across the site including a total of 146no. trees. Given the ratio of tree planting required to overcome the removal of trees to make way for the proposed development, there is a shortfall of the planting of 94 no. trees. We would like to highlight to the Council that there is no policy requirement for this compensatory tree planting standard included in the County Development Plan and is therefore perceived as a Council request. The applicant is happy to collaborate with the Council to satisfy this request which will establish a positive partnership between SDCC and the applicant and will further improve the amenity areas surrounding the site by providing further tree planting. The applicant is therefore willing to accept a condition outlining that further engagement to agree on the number of trees and planting locations of such compensatory tree planting following a grant of planning permission for the re-development of the site.

## 07. Traffic Management

The Roads Department request the following additional information:

(a) The proximity of access to the Scholarstown Road roundabout may present risks. There is a raised pedestrian crossing at the access. To achieve the sight lines when exiting the development motorists will need to stop closer to the intended stop line, this will mean stopping on the pedestrian crossing. There is no elevation detailing the access location, a detailed visibility splay is required to ascertain if boundary treatment, street trees etc will limit forward visibility from the development. The road safety audit notes that on street parking on one side of Orlagh Grove if allowed to continue will obstruct visibility to and from the development and compromise safe unobstructed two-way movement on the road. The proximity to the access point of the neighbouring retail units could cause visibility issues when used simultaneously leading to traffic hazard. Because of the nature of the neighbouring retail units, they would have a high frequency traffic use, resulting in an increased risk. The applicant is requested to move



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the proposed access location away from the other access or provide some mitigation to reduce the frequency of use of the other access.

The access point proposed off Orlagh Grove is the existing entrance into the site and is considered the most appropriate given the overall design of the proposed development and the need to protect the heritage value of Scholarstown House. This access point has been redesigned. A sight distance of 24m measured 2.4m back from the road edge is in full compliance with the Design Manual for Urban Streets and Roads. This updated access arrangement is outlined in the drawings prepared and submitted by Martin Hanley Consulting Engineers (Drawing No's. SH-DA-P01 and SH-DA-P02). This arrangement was discussed with Graham Murphy of the Transport Section on the 3<sup>rd</sup> of February 2023, who agreed this approach in principle subject to review of the final proposals which are now being submitted with the RFI response.

(b) This development would be considered in zone 1 for parking as the near by public transport is not high frequency nor multidirectional, and the nearest LUAS stop is over 5km away (the transport assessment notes the development is in close proximity). A ratio of 0.64 has been applied to other developments in the area and would be considered appropriate for this, therefore the roads department consider the parking rate of 40no. a little low and would request additional parking closer to 49no. spaces. A revised layout of not less than 1:200 scale showing the location and number of parking spaces to be provided at the development should be submitted. Please refer to Table 12.25: Maximum Parking Rates (Residential) – from the SDCC County Development Plan 2022-2028.

Efficiencies have been found within the site layout as submitted at application stage which has allowed for the inclusion of 4 no. of additional car parking spaces. We would like to highlight that there has been a net reduction in proposed units from 76 to 72 which also increases the ratio of car parking per apartment. The ratio of car parking spaces per apartment has been increased to 0.61 no. car parking spaces, which is considered acceptable as it will encourage future occupants of the scheme to use more sustainable modes of transport such as walking, cycling and public transport. We note that the Board Inspector when assessing the Two Oaks Development to the north west of the site (ABP Ref: 305878-19) noted that the location is suitable for lower car parking standards given its proximity to public transport. It was stated:

"I am satisfied that most of the ingredients are in place to encourage existing and future residents to increase modal shift away from car use to more sustainable modes of transport and this can be achieved by the implementation of the mobility management plan and car parking strategy submitted by the applicant".

We also note that the standards included in Table 12.26 of the County Development Plan are maximum standards and are provided to ensure that car dependency in the County is reduced. It is therefore considered that the provision of 44 no. of car parking spaces to serve the site is considered acceptable.



(c) A revised layout not less than 1:200 scale showing the pedestrian routes within the development.

All footpaths shall be a minimum of 2.0m wide.

(d) A revised layout not less than 1:200 scale of the elevation of the access location detailing the boundary walls and gates at vehicle access points shall be limited to a maximum height of 0.9m, and any boundary pillars shall be limited to a maximum height of 1.2m, in order to improve forward visibility for vehicles.

A drawing has been prepared by Martin Hanley Consulting Engineers (Drawing No. SH-DA-P01) which demonstrated the visibility for vehicles. Boundary walls are reduced down in height to provide a dwarf wall with railings over which will aid in improving visibility for vehicles, and proposed pillars are kept at to a maximum height of 1.2m. Please refer to Drawing No. PE21023-CWO-ZZ-ZZ-DR-A-2601 prepared by C+W O'Brien for further details on the vehicle access point.

- (e) Details of discussions with Public Realm in resolving Tree conflict with access point.
- (f) A revised layout of not less than 1:200 scale a swept path analysis showing how the cars can safely access and egress the parking spaces for the development.
- (g) Accurate plans demonstrating the provision of a visibility splay with 2.4 meters set back at a 1.05 meter height from ground level and 49 meters sight lines in both directions from the entrance. Sight lines should be shown to the near side edge of the road to the right-hand side of entrance and to the centreline of the road to the left-hand side of the entrance (when exiting). The visibility shall consider the proximity of the vehicle access to the south.
- (h) A revised layout of not less than 1:200 scale detailing a cycle route from the proposed access to the existing cycle infrastructure on the Scholarstown Road.

Please refer to the Development Access Drawings prepared by Martin Hanley Consulting Engineers (Drawing No's. SH-DA-P01 and SH-DA-P02), the Landscape Masterplan and Cycle Route drawings (Drawing No's. 22159-2-100 and 22159-2-102) prepared by Cunnane Stratton Reynolds which outline the details as requested by the Council with regard to points 7 (e), (f), (g) and (h).

(i) Internal access should be provided to the bicycle store at ground floor within the proposed apartment building.

Due to fire safety concerns, it was not possible for the Project Architects C+W O'Brien to include this access as requested, therefore no change is proposed to the access points at ground floor level of the proposed apartment block.

(j) It is not clear where all the external bicycle parking spaces are, in order to meet the 183 no. total stated. The applicant is requested to clarify this.

The revised Landscape Masterplan prepared by Cunnane Stratton Reynolds (Drawing No. 22159-2-100) clearly indicates the proposed cycle parking locations for the proposed development.



#### 08. SuDS

(a) Proposed surface water attenuation calculations are unclear. The applicant is requested to submit a report showing surface water attenuation calculation in table format. Show the site area in m2, and areas of different surface types in m2. Examples of surface types are buildings, green roofs, roads, pathways, permeable paving, green areas and their respective run off coefficients. Show in a report the SAAR (Standard annual Average Rainfall) value and green field run off rate in litres/second/hectare for the proposed development site. Use Met Eireann rainfall figures for the site when calculating the surface water attenuation required.

(b) The applicant is requested to submit a drawing showing the capacity in m3 of surface water attenuation provided in m3 of each SuDS (Sustainable Drainage System) system

The proposed Surface Water Attenuation results were prepared by Micro Drainage. This testing for infiltration rate of the site determined that the site was unsuitable for the inclusion of soakaways. As a result of this, the SuDS strategy used in the calculations submitted at application stage did not include any infiltration into the ground. The following strategy for SuDS was therefore considered the most appropriate:

Surface water drainage is to be dealt with onsite with the use of a number of SuDS features including swales, detention basins and permeable paving which have been incorporated into the Landscape Strategy for the site. The capacity of surface water attenuation being provided is included in Table 1 of the submitted Response to RFI letter prepared by Horgan Lynch Consulting Engineers which also provides further information in relation to the SuDS strategy proposed.

We consider this response addresses each of the matters raised in the RFI and we look forward to a positive decision in due course.

Please do not hesitate to contact us if you have any gueries.

Yours Sincerely

Kayleigh Sexton HW Planning

Kayleigh Sudson