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D24 A3XC

Tuesday, 30<sup>th</sup> May 2023

To Whom It May Concern

**RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION FOR A DEVELOPMENT AT  
COTTBROOK, CASTLEKELLY, BOHERNABREENA, CO. DUBLIN, D24 YY42**

**SOUTH DUBLIN COUNTY COUNCIL REG. REF. 'SD22B/04,65'**

## 1.0 INTRODUCTION

### 1.1 Response to Request for Additional Information by Fingal County Council

This letter is submitted by Thornton O'Connor Town Planning<sup>1</sup> on behalf of Alida Stewart and John McGrane in Response to a *Request for Further Information* issued by South Dublin County Council on 8<sup>th</sup> December 2022 in respect of an extension to the rear of the existing dwelling at Cottbrook, Castlekelly, Bohernabreena, Co. Dublin.

In accordance with Article 33(3) of the *Planning and Development Regulations 2001* (as amended), an extension of three months to the period permitted to respond to the *Request for Additional Information* was sought and agreed with South Dublin County Council in respect of this Planning Application (Appendix A). The final submission date for this *Response to Request for Additional Information* is 18<sup>th</sup> September 2023.

### 1.2 Proposed Development

Permission, as described in the Statutory Notices submitted with the 'as-lodged' application and detailed below, has been sought by Alida Stewart and John for an extension to the rear of the existing dwelling at Cottbrook, Castlekelly, Bohernabreena, Co. Dublin:

*"The development will consist of an extension to the rear of the existing dwelling. This extension will be single storey and located at a half level above the ground floor of the existing dwelling to respect the site contours. The extension will have a four sided pitched roof with a central rooflight and will be linked to the existing house via a flat roofed element. This application includes for attendant works of drainage and landscaping to facilitate the above."*

<sup>1</sup> No.1 Kilmacud Road Upper, Dundrum, Dublin 14

The residential extension, as originally lodged with the Planning Authority, has been modified to address matters raised in the *Request for Additional Information*. The modifications are shown on the plans and particulars submitted with the key changes summarised below for ease of information:

- The floor area of the proposed house extension has reduced by 91 sq m (from 162 sq m to 71 sq m), removing the previously proposed master bedroom and en-suite in addition to the office proposed as part of the dwelling house;

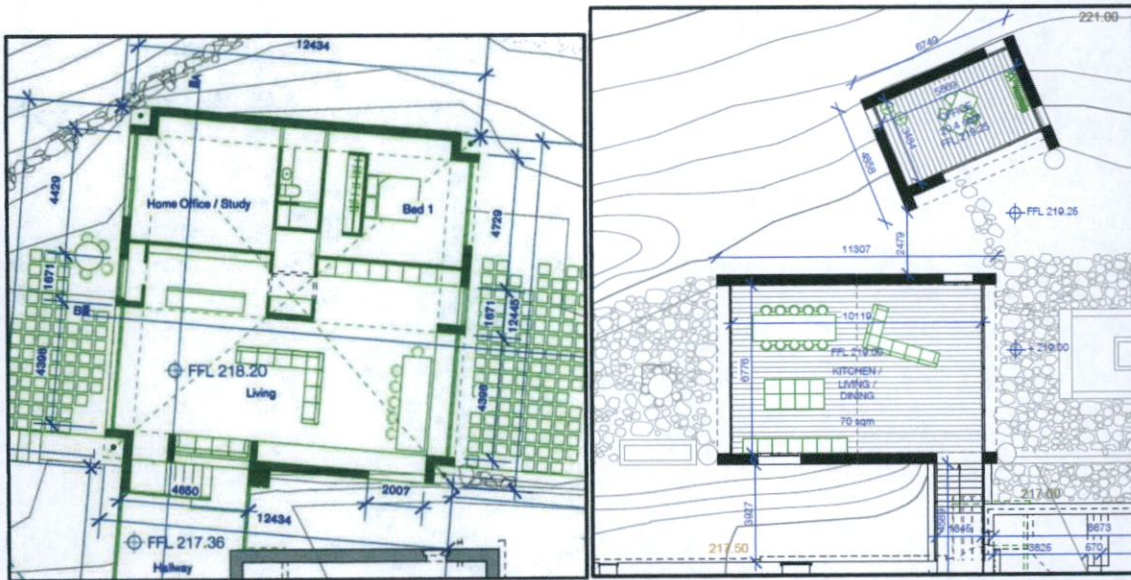


Figure 1.1: Proposed Extension as Originally Proposed (Left) and Revised RFI Scheme (Right)

(Source: Clancy Moore Architects)

- The addition of separate ancillary residential structure of 20 sq m to be used as a home office, located to the west of the proposed extension;

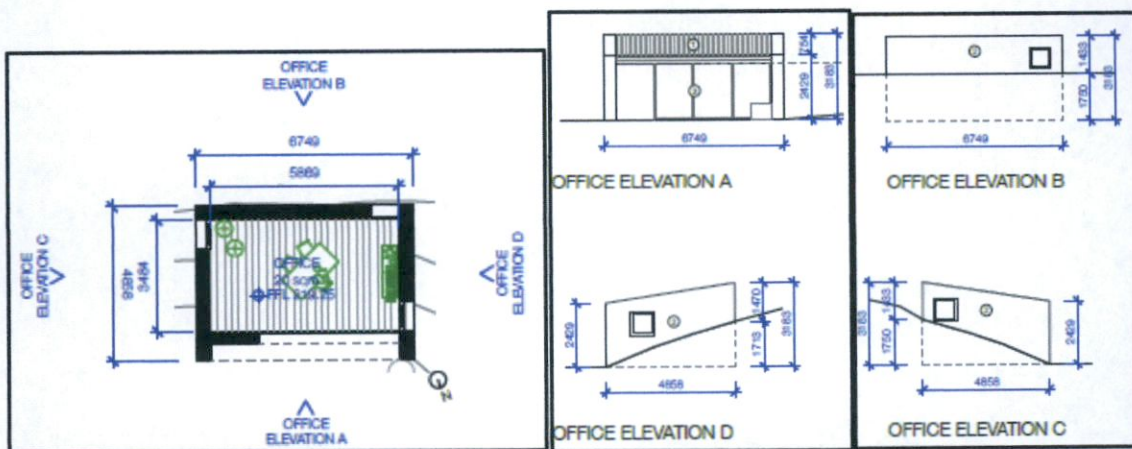


Figure 1.2: Proposed New Outbuilding to be Used as a Home Office

(Source: Clancy Moore Architects)

- The type of roof proposed has changed from large hipped roof to low hipped roof;

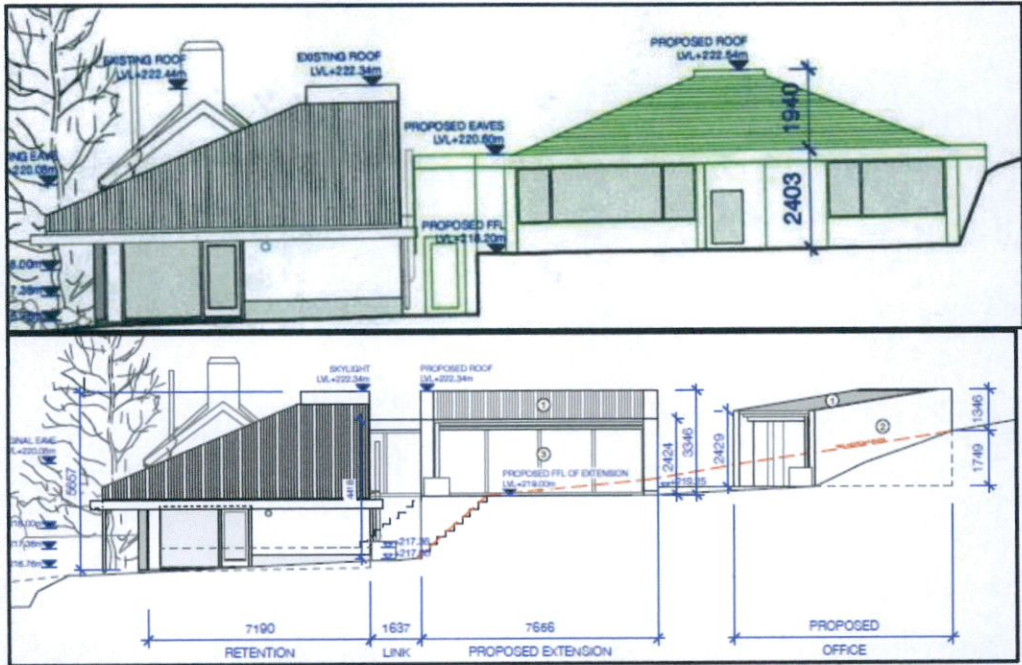


Figure 1.3: Side Elevation of the Proposed Extension Indicating the Type of Roof Originally Proposed (Top) and the Revised Type (Bottom)

(Source: Clancy Moore Architects)

- The removal of a separate ancillary residential structure of 24 sq m that was constructed as exempted development and has been used as a home office, located to the southwest of the existing dwelling.

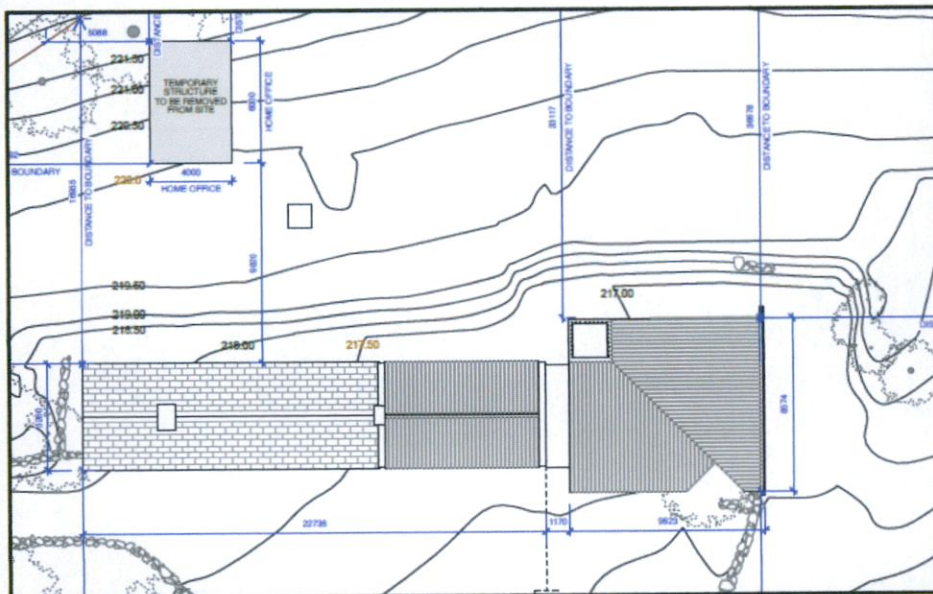


Figure 1.4: Extract from the Existing Site Plan Showing Position of Existing Home Office- Now Proposed to be Removed

(Source: Clancy Moore Architects)

The colour of the proposed extension is amended from the previously proposed white finish to the now proposed stone colour to aid in reducing its visual impact as viewed from the surrounding area.

The proposed development description has also been amended to reflect the Applicant now seeking retention permission for modifications and upgrades to part of the dwelling house. The development as reflected in the plans and particulars submitted with this *Response to Request for Further Information* is described as:

*'Permission for development comprising a single storey extension (71 sq m) to the rear of the existing dwelling house; and retention permission for development comprising the modification and upgrade of part of the dwelling house (57 sq m) including an increase in height of this structure from 3.4 to 5.5m and an increase in the area of this part of the building by 10 sq m including an increase in area to the connecting link to the adjacent building form.*

*The development also comprises the removal of an existing ancillary residential structure (24 sq m) in use as a home office; the provision of a new ancillary residential structure (20 sq m); and all associated drainage and landscape works on site to facilitate the above.*

*The gross floor area of the development now proposed comprises a dwelling of 211 sq m in addition to an ancillary structure of 20 sqm.'*

### 1.3 Documents Enclosed

The following are enclosed with this *Response to Request for Additional Information*.

#### 1.3.1 Planning

- 6 No. copies of this *Response to Request for Additional Information Cover Letter*, dated 30<sup>th</sup> May 2023, prepared by Thornton O'Connor Town Planning.

#### 1.3.2 Architecture

- 6 No. copies of the following Drawings prepared by Clancy Moore Architects.

Drawing No.	Drawing Title	Scale
135 P 001	Original Site Plan	1:200
135 P 010	Original GF Plan	1:200
135 P 030	Original Elevations	1:200
135 P 031	Original Elevations	1:200
135 P 020	Original Sections	1:200
135 P 101	Existing Site Plan	1:200
135 P 110	Existing GF Plan	1:200
135 P 130	Existing Elevations	1:200
135 P 120	Existing Elevation / Sections	1:200
135 p 201	Retention & Proposed Site Plan	1:200
135 P 210	Retention & Proposed GF Plan	1:200
135 P 230	Retention & Proposed Elevations	1:200

135 P 231	Retention & Proposed Elevations	1:200
135 P 220	Retention & Proposed Sections	1:200
P 157	Retention & Proposed Scheme W/ Topographical Survey > 20%	1:500
P 159	Original Scheme W/ Topographical Survey & Underlay of Appendix 5 Map	1:500
P 151	Proposed Site Sections (Drainage)	1:200
P 155	Original Scheme W/ Existing Topographical Survey	1:500
160	Proposed Site Location Map   100m Zone From Stream	1:1000
P 158	Appendix 5 of the Development Plan	NTS
P 135	Existing & Proposed Drainage Plan	1:250

### 1.3.3 Landscaping

- 6 No. copies of the *Landscape and Visual Impact Assessment* prepared by Áit Urbanism +Landscape Ltd., dated May 2023;
- 6 No. copies of the *Green Infrastructure and Landscape Plan* prepared by Enviroguide; and
- 6 No. copies of the following Drawings prepared by Enviroguide;

Drawing No.	Drawing Title	Scale	Size
P-01	Landscape Conceptual Plan	1:1200	A3
P-02	Landscape Plan Site Limits	1:500	A1
P-03	Landscape Plan	1:100	A3

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### 1.3.4 Ecology and Drainage

- 6 No. copies of the *Natura Impact Statement* prepared by Enviroguide; and
- 6 No. copies of a *Surface Water Mitigation Review* letter prepared by Enviroguide.

### 1.3.5 Verified Photomontages

- 6 No. copies of *Verified Photomontages* prepared by Digital Dimensions.

## 2.0 RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

The Planning Authority, in the *Request for Additional Information*, set out the following items requiring Additional Information:

### 2.1 Item No. 1 – Appropriate Assessment Screening

Item No. 1 states:

*“The development site is located within the 100m zone from streams, as per Appendix 5 of the Development Plan. This appears to provide a hydrological connection to the Bohernabreena Reservoir Catchment Area, the Glenasmole Valley SAC, the Glenasmole Valley pNHA. The site is also located proximate to the Wicklow Mountains SAC and the Wicklow Mountains SPA. The applicant has not provided an Appropriate Assessment (AA) Screening Report or Natura Impact Statement (NIS) to determine that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on the Natura 2000 network. It has therefore been determined that screening for AA is required and the applicant is requested to submit this as additional information. In the event that the development cannot be screened out for AA, an NIS will need to be submitted.”*

#### 2.1.1 Response to Item No.1

In response to Item No. 1 of the *Request for Additional Information*, a *Natura Impact Statement* has been prepared by Enviroguide Consulting and is submitted with this Response.

An Appropriate Assessment Screening was initially carried out to determine the potential for significant effects on relevant European sites, and to determine whether the proposed development would be appropriate in the context of the conservation objectives of such sites. The European sites that are to be of relevance, and that could possibly experience potential impacts as a result of the proposed development, are the Glenasmole Valley SAC, located c. 710 m northwest of the subject site, and the Wicklow Mountains SAC, located c. 105 m north of the subject site.

The Appropriate Assessment Screening concluded the following:

*“The Proposed Development at Cottbrook, Castlekelly, Bohernabreena, Co. Dublin, D24 YY42 has been assessed taking into account:*

- *The nature, size and location of the proposed works and possible impacts arising from the construction works.*
- *The qualifying interests and conservation objectives of the European sites.*
- *The potential for in-combination effects arising from other plans and projects.*

*Upon examination of the relevant information including in particular the nature of the Proposed Development and the likelihood of significant effects on European sites, the possibility may not be excluded that the Project will have a likely significant effect on any of the European sites listed below:*

- *Glenasmole Valley SAC (001209).*
- *Wicklow Mountains SAC (002122).*

*Accordingly, a NIS has been prepared for the Project and is included under separate cover."*

As such, a NIS has been prepared by Enviroguide Consulting which assesses the potential effects of the proposed development on the European sites. The potential effects the proposed development may have on the European sites were considered under the construction and operational phases.

Section 4.4 of the NIS provides a summary of the potential effects and how these can be avoided and what mitigation measures are to be taken. It was concluded that there would be no potential significant effects arising from the operational phase of the proposed development, however, the following provides the potential significant effects arising from the construction phase of the proposed development:

- *"Water quality impacts in designated sites arising from surface water run-off during the Construction Phase in particular during potential flooding events.*
- *Dust deposition in designated sites arising from earthworks.*
- *Disturbance impacts to otter within the Cottbrook stream or downstream waterbodies."*

The NIS provides measures that should be taken to ensure that these effects are mitigated during the construction phase. Once these mitigation measures are implemented, there will be no significant effects on the European sites as a result of the proposed development. The NIS concludes that:

*"Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, **once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European sites, individually or in combination with other plans and projects.** Where applicable, a suite of monitoring inspections have been proposed to confirm the efficiency of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.*

*As a result of the complete, precise and definitive findings in of this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Development will have no significant adverse effects on the Qis, SCIs and on the integrity and extend of Glenasmole Valley SAC and Wicklow Mountains SAC. Accordingly, **the Proposed Development will not adversely affect the integrity of any relevant European site.**"*  
[Our Emphasis]

It is considered that all information requested under Item No. 1 has now been addressed.

## 2.2 Item No. 2 – Reduction in Size of the Extension

Item No. 2 states:

*"The site is zoned within the Bohernabreena / Glenasmole Reservoir Restricted Area, per Appendix 5 of the Development Plan. H19 Objective 2 and IE3 Objective 5 state it is an objective of the Plan 'To generally prohibit development within restricted areas identified on the Bohernabreena / Glenasmole Reservoir Restricted Areas Map contained in Appendix 5.' It is not considered that this precludes the applicant from*

*developing at the site however, given the sites sensitivity, it is considered that the development as proposed is excessive in scale. Policy H2o Objective 1 restricts the scale of extension that would be acceptable in the HA-LV and HA-DV zones to no more than 50% of the original structure. This is considered an appropriate measure against which to assess the current proposal. In this regard, the applicant is requested to revise the proposal, significantly reducing the size of the proposed extension so as not to exceed the size of the current house by more than 50%. This would result in an acceptable size of development of approximately 70 sq.m. Revised plans, elevations and sections should be submitted as relevant, amending the proposal. In revising the scheme, the applicant should have regard to the existing dwellings vernacular style and reflect this in the design of any extension. In addition, development should reflect the topography of the site, reducing the need for hard engineered solutions. The applicant should have regard to Section 12.3.5 of the Plan which states that 'Proposals should ascend the contours of the site with unique design solutions such as lower density split level housing and sloping gardens with planted boundary treatments. Where changes in ground level between buildings are unavoidable, planted banks may be utilised.'*"

### 2.2.1 Response to Item No.2

Policy H2o Objective 1 is set out below for ease of reference and references the possibility of extending a dwelling house by not more than 50% of the original structure and also providing a separate structure where the use is incidental to the enjoyment of the house.

#### **H2O Objective 1:**

Within areas designated with the Zoning Objective 'HA-LV' (to protect and enhance the outstanding character and amenity of the Liffey Valley) and 'HA-DV' (to protect and enhance the outstanding character and amenity of the Dodder Valley) residential development will be restricted to:

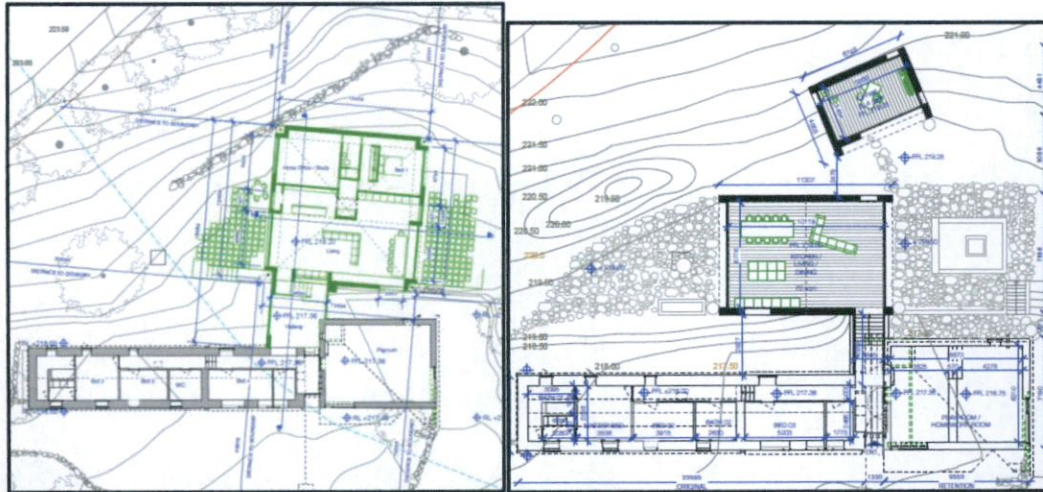
- The replacement of an existing structure by a structure of a similar size - see H21 Objective 1;
- The extension or alteration of an existing habitable structure - not to exceed 50% of the original structure
- The provision of a domestic garage, greenhouse, shed or similar non-residential structure where its use is incidental to the enjoyment of an existing dwelling house; and
- The preservation of the high amenity landscape, views or vistas of the valley, biodiversity and amenity.

In order to fully respect the policy and to comprehensively address this item of the *Request for Further Information*, the proposed house extension has been reduced in scale from a gross floor area of 162 sq m to 71 sq m, a total reduction of 91 sq m. Thus, the completed dwelling would have a gross floor area of 211 sq m if the RFI scheme is permitted.

Due to the need for a home office due to amended working practices emanating from the Covid 19 pandemic, it is proposed to remove the existing ancillary residential structure on site and replace it with a separate ancillary structure of 20 sq m to accommodate a home office. This structure, despite being within the exempted development limitations of 25 sq m is being included in the application for completeness.

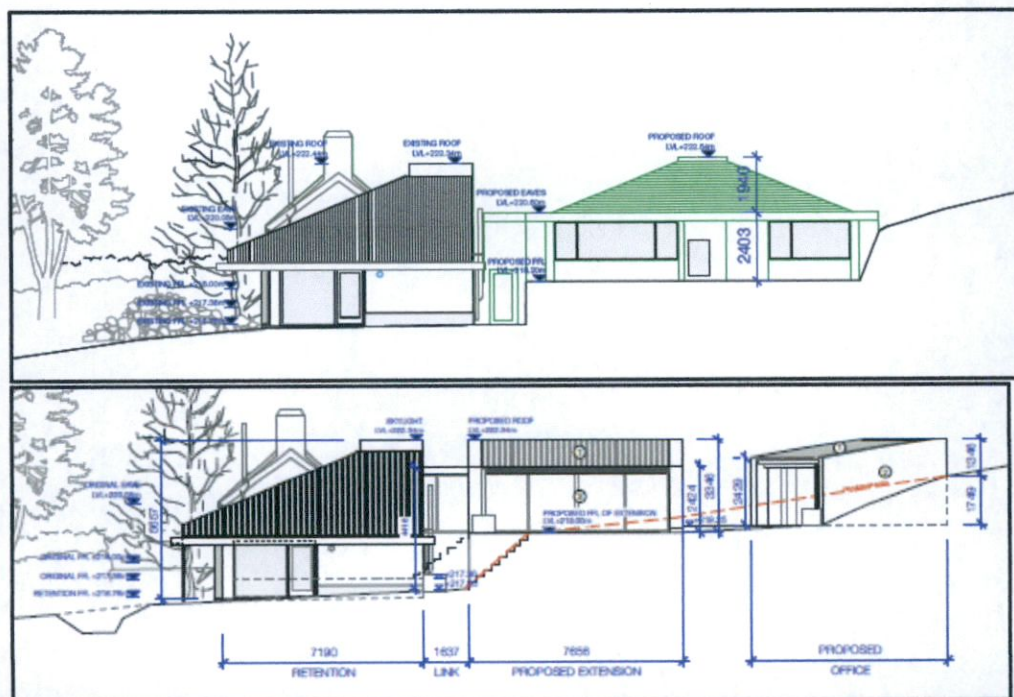


The height of the proposed extension has been reduced by 1 m, from 4.3 m to 3.3m in order to minimise its visual impact. The revised scale of the extension is shown in the re-submitted drawings prepared by Clancy Moore Architects, and are illustrated in Figure 2.1, 2.2 and 2.3 below.



**Figure 2.1** Ground Floor Plan as Submitted (left) and the Updated Ground Floor Plan (right)

(Source: Clancy Moore Architects)



**Figure 2.2** North-West Elevation as Submitted (top) and the Updated North-West Elevation (bottom)

(Source: Clancy Moore Architects)

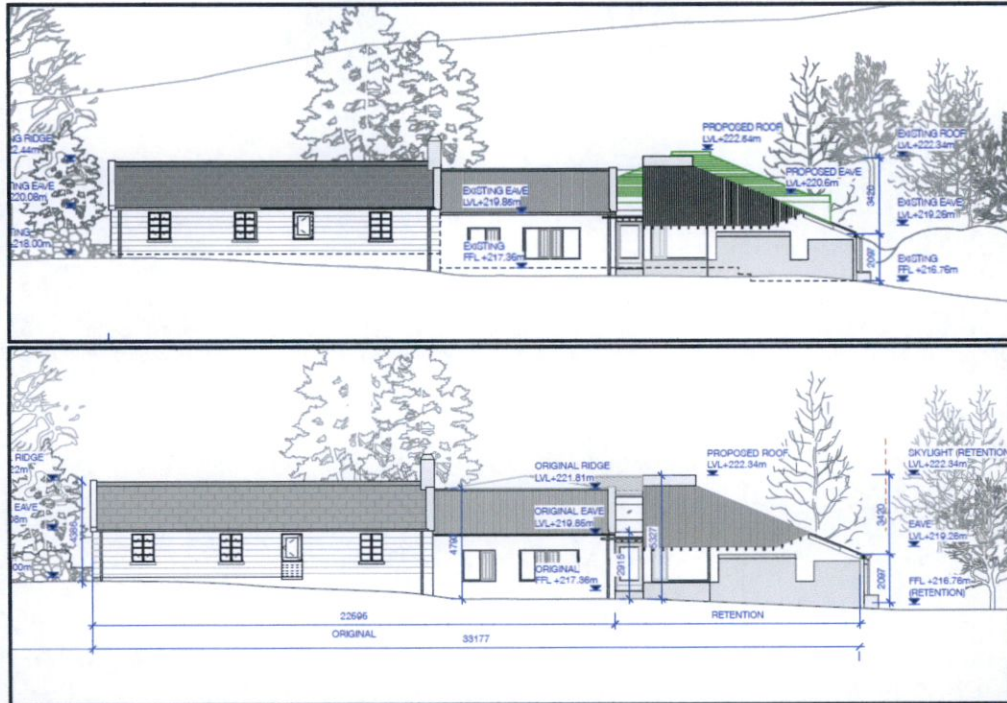


Figure 2.3 East Elevation as Submitted (top) and the Updated East Elevation (bottom)

(Source: Clancy Moore Architects)

A *Landscape and Visual Impact Assessment (LVIA)* prepared by Ait Urbanism + Landscape Ltd., which include Verified View Montages prepared by Digital Dimension, are submitted with this Response. The Verified View Montages demonstrate what the subject site looks like as existing, from various viewpoints nearby, and what the subject site would look like with the proposed extension. The 6 No. viewpoints taken are identified in the *LVIA*, with an assessment provided for each viewpoint on the potential impact the proposed development may cause. The *LVIA* concluded the following under each viewpoint:

**Viewpoint 1**

*“The visual impact will therefore be imperceptible and neutral in the long term.”*

**Viewpoint 2**

*“The visual impact will therefore be imperceptible and neutral in the long term.”*

**Viewpoint 3**

*“There will be no visual impact from this viewpoint location.”*

**Viewpoint 4**

*“When proposed plantings as per the landscape rational have been implemented and established, the visual impact is likely to lessen in the long term to imperceptible and neutral.”*

**Viewpoint 5**

*“There will be no visual impact from this viewpoint location.”*

**Viewpoint 6**

*“Therefore, it is anticipated that in the medium to longer term, the visual impact will be neutral and imperceptible.”*

Examples of the viewpoints illustrating the existing site context and the site context with the proposed extension are demonstrated in Figure 2.4 and 2.5 below.



**Figure 2.4:** Existing (top) and Proposed (bottom) View from Cunard Road Upper

(Source: 'View 4 Existing' and 'View 4 Proposed', Verified Photomontages prepared by Digital Dimensions)



**Figure 2.5: Existing (top) and Proposed (bottom) View from the Tertiary Road off Old Military Road**

**(Source: 'View 6 Existing' and 'View 6 Proposed', Verified Photomontages prepared by Digital Dimensions)**

The subject site is identified within the Bohernabreena /Glenasmole Reservoir Restricted Area, as per Appendix 5 of the *Development Plan*. The revised scale of the extension has due regard to the sensitive location of the subject site by reducing the gross floor area and the height of the building. It is considered that the bulk of the building has been substantially reduced and the building aesthetic has been significantly improved, which will ensure that there will be no significant impact on the surrounding area as a result of the development.

It is considered that all information requested under Item No. 2 has been addressed.

## 2.3 Item No. 3 – Site Levels

Item No. 3 states:

*“There are concerns about the gradient of the site and its suitability to handle additional development, given the impact of increased hard standing and the interruption of the flow of surface water runoff. Section 12.3.5 of the Development Plan states that proposals on sites with a steep and / or varying topography should be accompanied by a comprehensive site analysis (including character appraisal and movement analysis), concept proposal and design statement as described and illustrated within the Urban Design Manual – A Best Practice Guide, DEHLG (2009). Such analysis should be accompanied by comprehensive site sections and plans detailing any proposed changes in site level and demonstrating how the proposal incorporates the natural slope and drainage features of the site. The applicant has not provided this information and is requested to do so to allow a full assessment of the proposed development and its potential impacts. In compiling this information, the applicant should also undertake and submit a topographical survey of the site, to determine its suitability for development.”*

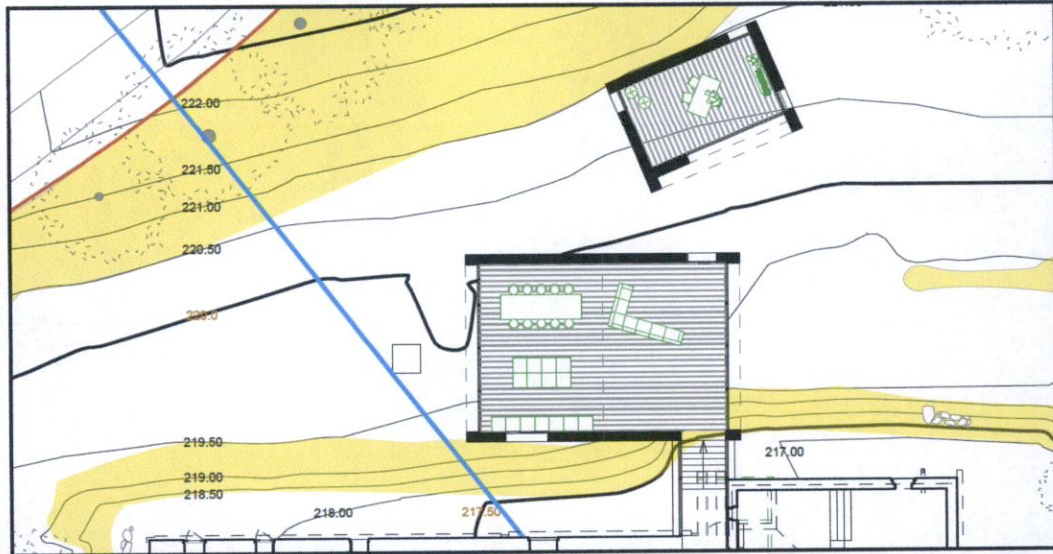
### 2.3.1 Response to Item No.3

In response to Item No. 3 of the *Request for Additional Information*, a detailed topographical survey of the subject site was undertaken by Clancy Moore Architects, where the physical condition of the subject site was recorded.

Section 12.3.5 of the *South Dublin County Development Plan 2022-2028* states that sites that have a steep and / or varying topography should detail any proposed change in site level difference and demonstrate how the proposed development incorporates the natural slope and drainage features of the site. The *Development Plan* recommends the following:

*“Proposals should **ascend the contours of the site** with unique design solutions such as **lower density split level housing** and **sloping gardens** with planted boundary treatments. Where changes in ground level between buildings are unavoidable, planted banks may be utilised.”*

A topographical survey including the > 20% slope is illustrated in Drawing No. P 157. The FFL of the proposed extension is approximately 1-2 metres above the FFL of the existing dwelling. In this regard, the design rationale for the proposed extension was to ensure the existing dwelling is the primary built form on the subject site. To accomplish this, the proposed extension settles into the existing topography and comprises only a single storey with a low-pitched roof.



**Figure 2.6: Topographical Survey of the Subject Site Including the > 20% Slope Highlighted in Yellow.**

(Source: Clancy Moore Architects)

The proposed extension has been revised to reduce its scale and ensure that the structure will integrate into the existing topography of the subject site. The height of the originally proposed extension reached 4.3 m, however, this has been reconsidered to reduce the visual impact in so far as possible by reducing the height of the extension by 1 m. A generous 92 sq m of floorspace has been removed from the originally proposed 162 sq m, whereby the floor area of the revised extension is now 70 sq m. The proposed extension is now proposed to be a stone colour finish to reduce the potential for visual impact.

Clancy Moore Architects has provided the following response with respect to detailing how the proposed design of the development ties in with the *Urban Design Manual – A Best Practice Guide*, DEHLG (2009):

*“With reference to the Urban Design Manual - A Best Practice Guide, DEHLG (2009), the core principles of urban design and sustainability have been considered while developing this design proposal and application. The following description of the proposals is structured according to the sub-headings contained within the Guide, where applicable to this site & scale of development;*

*Context – The proposed extension has been designed to sit naturally within the context of the original cottage, landscape & the character and identity of the area. The simplistic form, scale, massing and proposed materials respond to the existing character and will sit harmoniously within the relative context. The topography of the site is utilised, affording the extension to sit behind the existing cottage while at the same time being hidden from the front elevation. Minor amendments to the existing site are required to facilitate the works and a detailed landscape plan to allow for this has been developed which allows for sloped planted banks, terracing etc.*

*Efficiency - A landscape proposal has been designed to provide amenity & biodiversity while incorporating sustainable urban drainage systems.*

*Distinctiveness - The clients long standing connection to the area has resulted in a deep & emotional attachment. They are intent on their family growing here & are committed to the community and the conservation of the area and its distinct, natural beauty. The proposal builds on the character of architectural language as found, taking heed of the SDCC guidelines which reinforces the vernacular approach to design. The proposal would allow for a positive addition in all respects and would offer the homeowners additional views to the surrounding context.*

*Adaptability - The current accommodation fails to cater to our clients needs and growing family. The addition of an extension & home office would not only allow for the necessary additional space, but also allow for flexibility and adaptability as the family grows & their needs alter.*

*Privacy & Amenity - The multi-aspect design proposal allows for South & West facing terraces, which maximise; orientation, views, private and sheltered outdoor space etc.*

*Layout - The proposal seeks to cater to open-plan, indoor / outdoor living, in line with contemporary family living.*

*Detailed Design - The proposal seeks to add a positive contribution to the area with regards to it's architectural form and materiality. The landscape approach has been carefully considered and is in keeping with the building context and surrounding environment. A huge detail of care and consideration has been allowed for in this application, encompassing expertise and knowledge from a number of wide ranging disciplines in order to create a well, considered, sympathetic extension."*

It is considered that the design rationale behind the proposed extension has been extensively considered with the natural topography of the site aiding the scale, form and layout of the extension as demonstrated in the enclosed RFI stage drawing pack.

In regard to the surface drainage matter raised in Item No. 3, Clancy Moore Architects have provided a detailed surface water drainage design which is illustrated in Drawing No. P 150. Enviroguide Consulting has provided a review of the surface water design to ensure that the appropriate mitigation measures are in place to address the impact on surface water attenuation and runoff. This review is entitled 'Surface Water Mitigation Review' and is separately enclosed with this response. The following was concluded:

*"Overall, it is considered that the surface water drainage at the Site, through its design in accordance with SUDS principles, will address the impact on surface water attenuation and runoff."*

It is therefore considered that all matters raised in Item No. 3 has now been addressed.

#### **2.4 Item No. 4 – Landscape Visual Impact Assessment**

Item No. 4 states:

*"The applicant is requested to provide a Landscape Visual Impact Assessment of the proposed extension, when viewed from the wider area, with particular regard to views from areas indicated on Map 11 of the Plan as having protected views. A number of before and after images from various viewpoints should be provided to allow a full*

assessment of the impact of the development when viewed within the wider valley area."

### 2.4.1 Response to Item No.4

In response to Item No. 4 of the *Request for Additional Information*, a *Landscape Visual Impact Assessment* has been prepared by Áit Urbanism + Landscape Ltd. and is submitted alongside this Cover Letter. The context of the existing subject site was captured through 6 No. viewpoints nearby (by Digital Dimensions), and the context of the subject site with the proposed extension was generated to investigate the possible impact of the development when viewed within the wider valley area. The location of the 6 No. viewpoints are illustrated in Figure 2.7 below. The findings of the impact of the proposed development on these views of the subject site have been provided in Section 2.2.1 of this Cover Letter.

Overall, there will either be an "imperceptible and neutral" visual impact, or "no visual impact" arising from the proposed development. It is therefore considered that Item No. 4 has now been addressed.

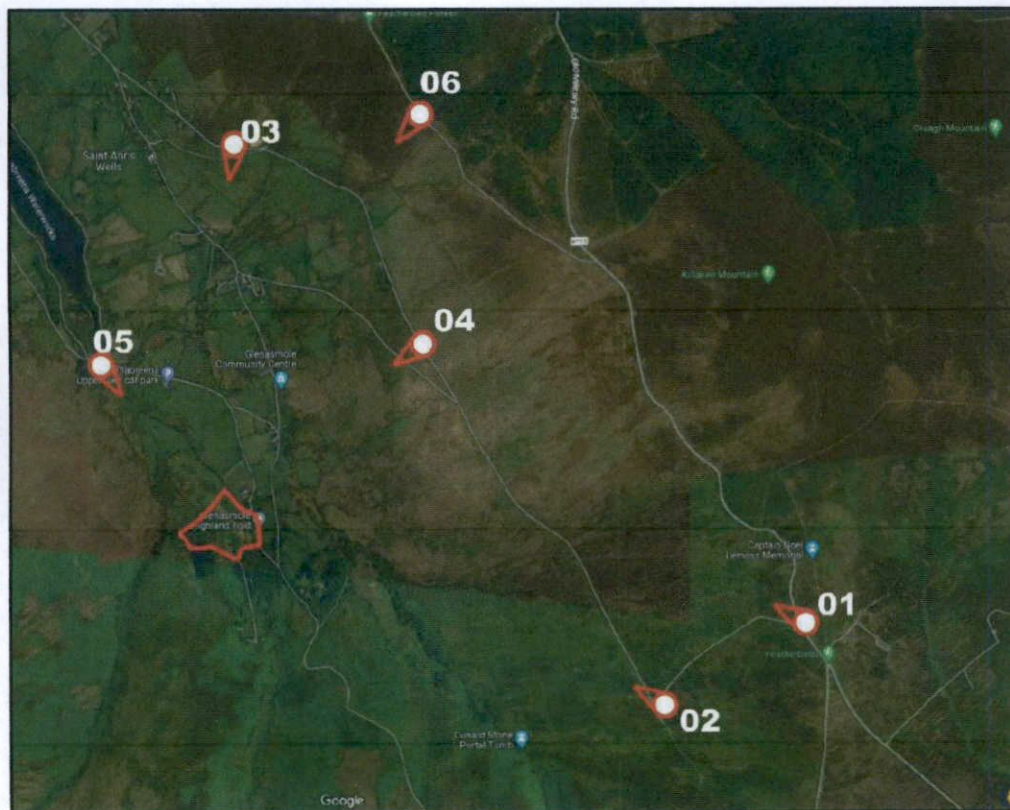


Figure 2.7: Location of the 6 No. Viewpoints with the Indicative Boundary of the Subject Site Outlined in Red

(Source: Digital Dimensions)

### 2.5 Item No. 5 – Original Structure

Item No. 5 states:



*"It is not clear from a site visit and a review of the SDCC planning record the planning status of certain elements of the existing dwelling. The applicant is requested to provide clarity in relation to any additions to the original cottage and regularise this development as necessary. In addition, from a site visit it was evident that a single storey outbuilding has been constructed at the site. This does not appear to be indicated on existing or proposed site layout plans, and the planning history of this structure is also not clear. The applicant is requested to clarify this and ensure that all existing and proposed site plans include ALL structures on site."*

### 2.5.1 Response to Item No.5

In response to Item No. 5 of the *Request for Additional Information*, the Applicant has clarified that there were 3 No. original connected structures on site as shown in Figure 2.8 below and depicted on Dwg. No. 135 P 030 now enclosed.



**Figure 2.8: Photographs of the Original Structure Prior to any Works**

**(Source: as provided by the Applicant)**

We are advised that refurbishment of the original structure was carried out under Section 4 (1)(h) of the *Planning and Development Act, 2000* (as amended), which includes the following works as exempted development:

*“development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures”* [Our Emphasis

The works carried out change the appearance of the structure as shown in Figure 2.8 below and increase the area of the structure by 10 sq m (within the threshold of 40 sq m that can be considered exempt), however it is likely a matter of opinion as to whether the works render part of the dwelling inconsistent with the character of the structure or not. Due to the level of subjectivity in this regard, it has been decided to include the retention of the works as part of the subject application.

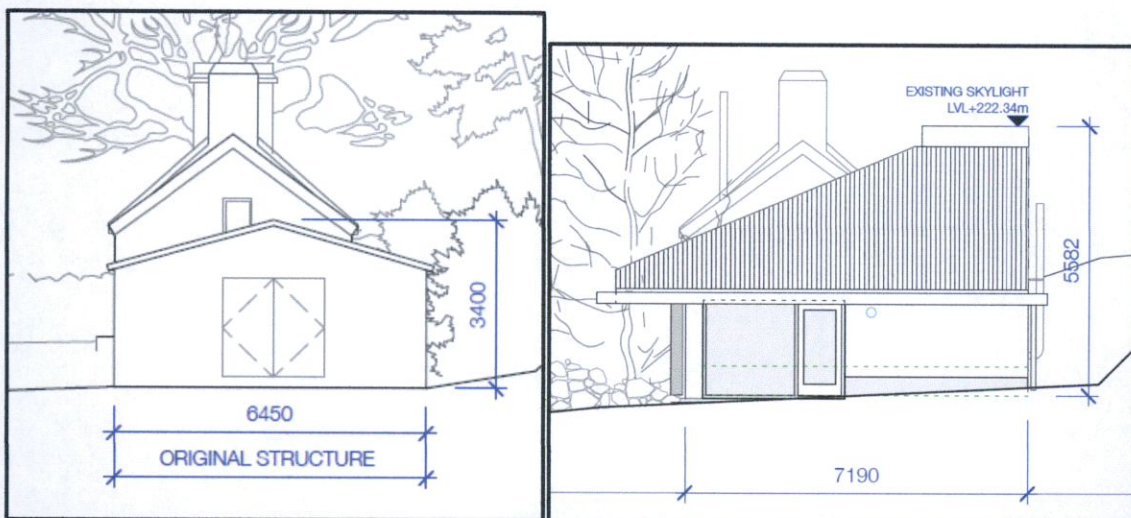
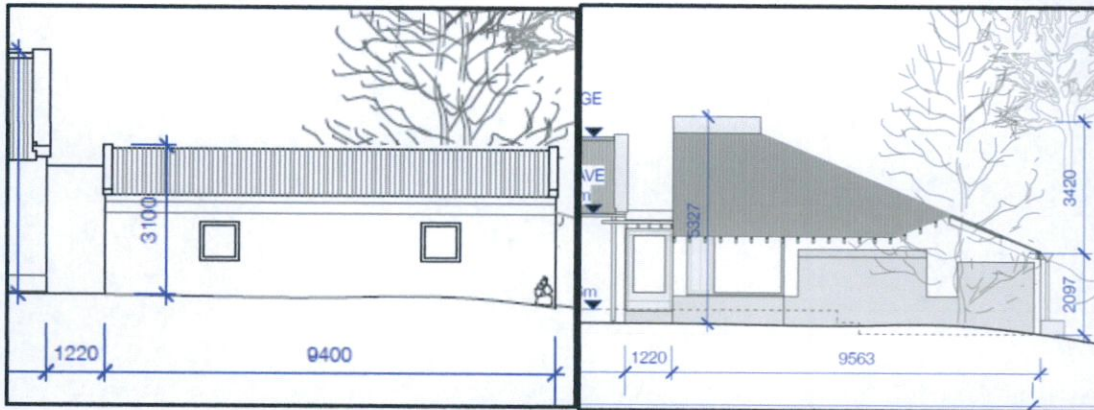


Figure 2.9: Northern Elevation of the Original Structure (Left) and the Existing Structure (Right)

(Source: Clancy Moore Architects)



**Figure 2.10: Eastern Elevation of the Original Structure (Left) and the Existing Structure (Right)**

**(Source: Clancy Moore Architects)**

The single storey outbuilding that exists on site is shown on Dwg. No. 135 P 110 and is now proposed to be removed.

It is considered that all information requested in Item No. 5 has now been addressed.

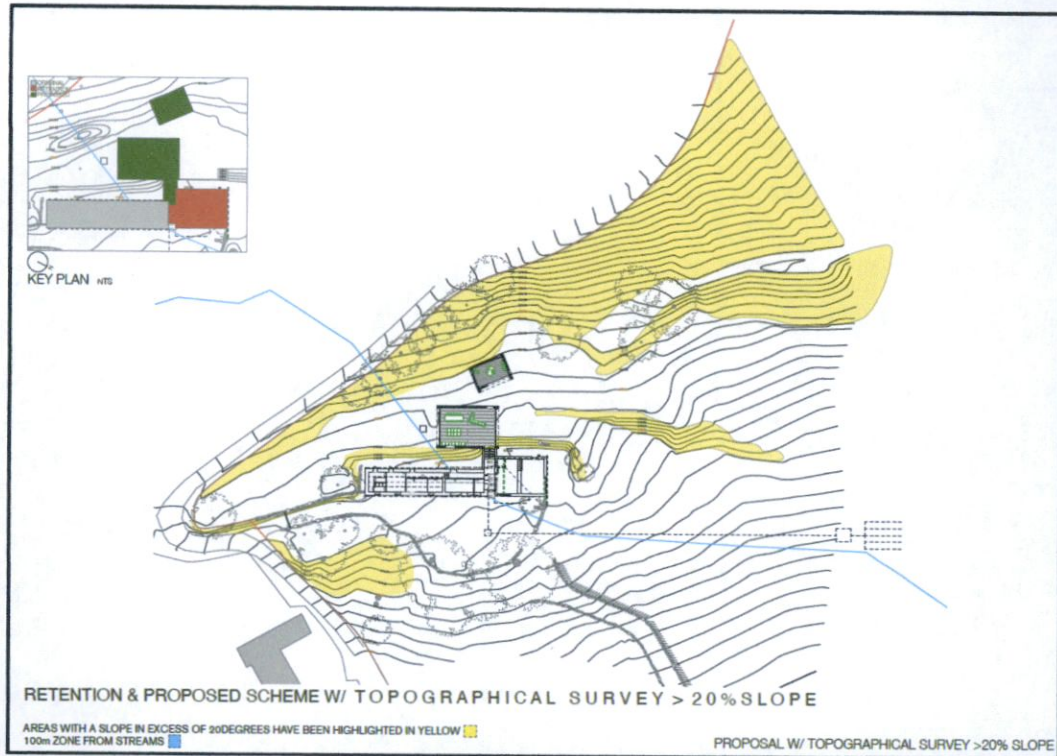
## 2.6 Item No. 6 - Restricted Areas for Development Glenasmole and Bohernabreena

Item No. 6 states:

*"It appears from a review of Appendix 5 of the Development Plan that the area for which development is proposed overlaps with both the 100m zone from streams and slope greater than 20% layers of the Map showing the Restricted Areas for Development Glenasmole and Bohernabreena. The applicant has indicated these areas on layout plans however, there is a discrepancy in the areas shown on the applicants submission, and the areas shown on the map contained at Appendix 5. The applicant is requested to clarify this item, updating maps as necessary or confirming how conclusions were reached on site about where these layers have been shown."*

### 2.6.1 Response to Item No.6

In response to Item No. 6 of the *Request for Additional Information*, a Topographical Survey (Drawing no.157) has been submitted alongside this Cover Letter, which clearly indicates the 100m zone from streams and slopes greater than 20% (Figure 2.11).



**Figure 2.11: Topographical Survey Including the >20% Slope and 100m From Streams**

(Source: Clancy Moore Architects)

The location of the subject site in respect of the Map showing the Restricted Areas for Development Glenasmole and Bohernabreena, which is found in Appendix 5 of the *Development Plan*, is illustrated in Figure 2.12. As evidenced, the quality of the map does not allow for sufficient accuracy to capture the physical situation as evidenced in the detailed topographical survey. Clancy Moore Architects contacted South Dublin County Council to obtain a better-quality map / interactive drawing, however, they were advised that this was not possible. Thus, the information provided is based on the site specific data provided by the topographical survey.

As demonstrated by Figure 2.11 above, the proposed works are located outside of both the 100m zone from streams and also the area subject to slopes greater than 20%.

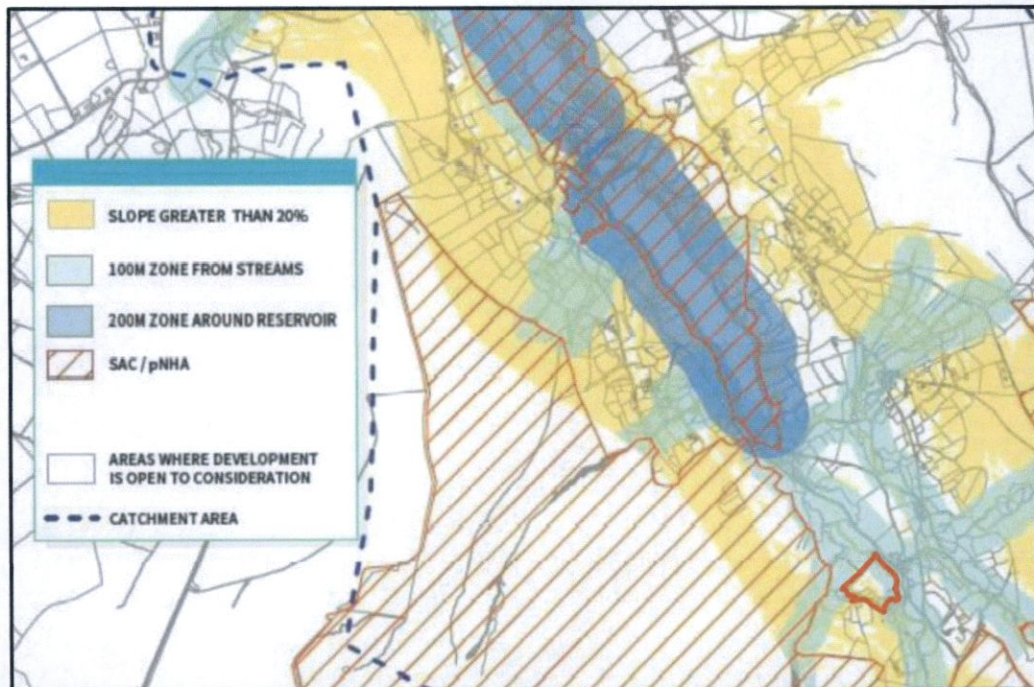


Figure 2.12: Restricted Areas for Development Glenasmole and Bohernabreena (With the Indicative Boundary of the Subject Site Outlined in Red)

(Source: Appendix 5, South Dublin County Development Plan 2022-2028, Annotated by Clancy Moore Architects, 2023)

2.7 Item No. 7 – Green Infrastructure Plan & Item No. 8– Landscape Plan

Item No. 7 states:

*“Green Infrastructure*

*The applicant is requested to submit a Green Infrastructure Plan which shall be submitted as part of the suite of Landscape Plans that are required for a development. The Green Infrastructure Plans should include the following information:*

- A. Site location plan showing the development site in the context of the wider GI as shown on the Council’s GI Plan for the County.*
- B. Indicate how the development proposals link to and enhance the wider GI Network of the County.*
- C. Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.*
- D. Proposals for identification and control of invasive species where appropriate, for the site.”*

Item No. 8 states:

*“Landscape Plan*

*Ideally a landscape scheme shall be provided as part of the development proposals which helps to integrate the development into the local landscape and through mitigation of vegetation lost and negative visual effects, which improves local biodiversity and green infrastructure links. The Landscape Plan should be prepared by a suitably qualified landscape consultant/designer. The Landscape Plan shall include*

*details of hard and soft landscaping, in addition the applicant is requested to submit a fully detailed Planting Plan for the development."*

### **2.7.1 Response to Item No. 7 & 8**

In response to Item No. 7 & 8 of the *Request for Additional Information*, a *Green Infrastructure and Landscape Report* prepared by Enviroguide is submitted alongside this Cover Letter. Some 2 No. drawings (Landscape Conceptual Plan and Proximity Garden Masterplan) are also submitted which demonstrate the proposed green infrastructure of the entire subject site and the proposed landscape design. As part of the green infrastructure assessment of the existing subject site, the *Report* noted the potential impacts, if any, that the proposed development would have on the existing green infrastructure:

*"No negative impact was identified on the closest or wider green structure in the vicinities. No restoration proposals are deemed as necessary in the context of the Proposed Development. However, some enhancement proposals will reinforce the existing green infrastructure within the Site and contribute to mitigating the visual impacts of the Proposed Development."*

A Conceptual Plan is provided which demonstrates the intention to reinforce the peripheral hedgerows of the subject site and the clusters of vegetation that are distributed within the subject site.

A Landscape Plan is provided which proposes to integrate the proposed extension with the wider landscape and improve biodiversity and green infrastructure links. As set out in the *Green Infrastructure and Landscape Plan*, the main aims of the landscape design are:

- *"Incorporate high-level strategic Green Infrastructure policies and objectives as outlined in the South Dublin County Development Plan ("022-2028);*
- *Screen or soften the proposed buildings;*
- *Contribute to sustainable drainage by including SuD'S measures integrated into the landscape scheme, contributing to positive place-making, climate resilience and biodiversity as well as water management.*
- *Enhance the biodiversity value of the development site through the creation of a number of new habitats and the addition of bat, bird and bee nesting sites;*
- *Uses of natural hedgerows, trees, shrubs and grasslands to strengthen GI assets and provide connections to the wider GI Network;*
- *No net loss of existing trees/hedgerows on Site."*

Both soft and hard landscaping is proposed in order to blend the proposed extension in with the surrounding area, while contributing positively to green infrastructure on site. The proposed landscaping will increase biodiversity on site through the introduction of native and pollinator friendly species, natural SuDS features, and boundary planting. More details of the proposed landscaping scheme is provided in the accompanying *Green Infrastructure and Landscape Plan* and the Landscape Plan drawing prepared by Enviroguide Consulting.

It is considered that all information requested in Item No. 7 & 8 has now been addressed.

## 2.8 Item No. 9 – Septic Tank

Item No. 9 states:

*"The applicant was permitted a new septic tank in 2021 under SD21B/0343. The applicant has not submitted details on the suitability of this septic tank to manage the potential for additional loading as a result of the proposed extension. The applicant is requested to submit evidence that the septic tank on site is of an appropriate size to manage the cumulative load of the existing dwelling and the proposed extension."*

### 2.8.1 Response to Item No.9

In response to Item No. 9 of the *Request for Additional Information*, the scheme has now been reduced in scale and there is no longer any additional bedspaces proposed. Thus, the current system is suitable to accommodate the proposed extension.

Specifically, the revised scale of the proposed extension has resulted in the removal of the previously proposed master bedroom and en-suite. As the use of the proposed extension will be for kitchen / dining / living space purposes, with no additional bedrooms or bathrooms proposed, there will be no additional load released to the septic tank. The number of occupants, bedrooms and bathrooms in the house will remain the same. The septic tank currently in place, permitted under SDCC Reg. Ref. SD21B/0343, is new and is expected to last for a long period of time.

It is considered that all information requested in Item No. 9 has now been addressed.

## 2.9 Item No. 10 – Sustainable Drainage Systems (SuDS)

Item No. 10 states:

*"The applicant has not provided any information regarding SuDS at the site, or any mitigating measures to address the impact on surface water attenuation and runoff as a result of the proposed extension. The applicant is therefore requested to submit the following:*

A. a drawing in plan and cross sectional views clearly showing proposed Sustainable Drainage System (SuDS) features for the development. The applicant shall include SuDS (Sustainable urban Drainage Systems) features for the proposed development such as but not limited to the following:

- i. Rain Gardens*
- ii. Planter boxes with overflow connection to the public surface water sewer.*
- iii. Permeable Paving*
- iv. Grasscrete*
- v. Green Roofs*
- vi. Rain gardens*
- vii. Swales*
- viii. Rills*
- ix. Water Butts*
- x. Other such SuDS"*

### 2.9.1 Response to Item No.10

In response to Item No. 10 of the *Request for Additional Information*, the *Green Infrastructure and Landscape Plan*, prepared by Enviroguide, sets out the specific SuDS measures that are proposed:

- "3 Bioretention areas / Rain gardens.
- Swale at east of the existing car parking to collect the surface water in this area.
- Soakaway at north of the existing house.
- Permeable paving."

Also, a drawing entitled '*Existing & Proposed Drainage Plan*' prepared by Clancy Moore Architects, has been submitted alongside this Cover Letter which provides detailed SuDS and drainage provision. It is considered that the proposed SuDS measures are adequate to address any possible surface water attenuation and water runoff consequent of the proposed extension.

It is therefore considered that all information requested in Item No. 9 has now been addressed.



### 3.0 CONCLUSION

We submit that the 10 No. items requested by South Dublin County Council have been fully and comprehensively addressed. The proposed development represents an appropriate, contemporary and innovative design at the subject site, ensuring that there is no material visual impact to the receiving environment.

The proposed extension has been well considered by a highly experienced Design Team and has been designed to accord with National, Regional and Local Level Planning Policy and will provide a high-quality living environment. The extension will allow the internal rearrangement of the existing structure so as to provide much needed space for a young family.

We trust that this Submission fully addresses the matters raised in the *Request for Additional Information*; however, please do not hesitate to contact us if we can be of any further assistance or provide further clarification.

We look forward to receiving an acknowledgement of receipt of this Response and subsequent Decision in respect of the above.

Yours faithfully,



Sadhbh O'Connor  
Director  
Thornton O'Connor Town Planning