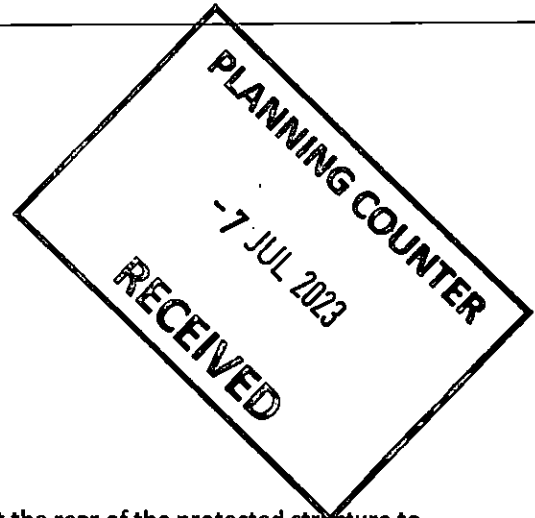


7th July 2023

Planning Department
South Dublin County Council
County Hall
Town Centre
Tallaght
Dublin 24



Reg. Ref.: SD22A/0323

Proposal: (i) the demolition of a shed & workshop at the rear of the protected structure to facilitate the provision of 18 no. Car parking spaces; (ii) the construction 12 no. Dwellings comprising 8 no. 2 storey with attic level accommodation, 4 bedroom semi-detached dwellings (c. 146 sq.m. each) and 4 no. 2 storey with attic level accommodation, 3 bedroom semi-detached dwellings (c. 126 sq.m. each) with vehicular access at main street; (iii) a pedestrian access to forest hills at the southern end of the site; and ancillary site development works all within the curtilage of a protected structure at Main Street, Rathcoole, Co. Dublin (A Protected Structure – RPS NO. 323)

FI Request: 3rd October 2023

Respond By: 11th July 2023

Re: FURTHER INFORMATION RESPONSE

Dear Sir or Madam,

The Council's further information request dated 3rd October 2022 in respect of the above application refers. By agreement, the time period to file the further information response was extended by 3 months up to and including 11th July 2023. There were 15 no. items on the request; each is addressed in turn below.

1. Architectural Conservation.

(A) The proposed development includes for the demolition of a shed and workshop at the rear of the Protected Structure to facilitate the new back land development. The shed and workshop structures are of modern construction and/or of no architectural merit, however it is considered that details should be provided on how the Protected Structure will be safeguarded during the proposed demolition and proposed construction of the new development. Details around how the Protected Structure will be protected and safeguarded during the proposed demolition and construction works is requested.

A noted in this FI item, neither of the structures to be demolished are of architectural merit. The workshop is adjacent to the eastern site boundary and will be demolished primarily by hand to

avoid damage to the boundary wall with the debris removed by machinery. Demolition of the shed will require machinery to remove the roof, roof trusses, etc. and to clean up debris. However, it should be noted that the shed abuts a 20th century addition to the protected structure which has no historic or architectural importance. Notwithstanding, that part of the shed attached to the rear extension to the protected structure will be removed by hand to minimise and where possible, avoid damage to the retained structure.

It is proposed to erect protected fencing along either side of the protected structure and across the rear of it (following completion of demolition) to protect it during construction. It is anticipated that the office use will continue during construction, so access to the offices will be maintained at the front of the protected structure. The Council is invited to condition a Construction Management Plan for agreement prior to the commencement of development and this can include final details of protective measures for the protected structure.

(B) It is considered that the proposed development within the curtilage of the existing Protected Structure is an opportunity to improve the overall setting to the front and rear of the Protected Structure. In order to improve the setting of the Protected Structure and streetscape setting, a landscape plan that provides new soft planting and trees to the front site and the rear area of the Protected Structure should be submitted. It is noted that the proposed front boundary wall will be improved with the insertion of granite capping and iron railings with planting along the wall but it is felt more planting and soft landscaping is required to remove the amount of hard surface and improve the overall landscape setting of the front site and rear site of the Protected Structure.

The Council is referred to the enclosed drawings and landscape rationale from RMDA Landscape Architects and Drg. No. FI-04D by Collins Maher Martin Architects.

(C) It is proposed to provide a new entrance piers to the west of the site for access to rear parking behind the Protected Structure, one of the piers is extremely close to the existing building and therefore this needs to be addressed. The removal of these gate piers should be considered.

The proposed access and egress to the development has been amended following consideration of the further information response whereby the entrance is now proposed to the east of the protected structure and the exit to the west of it. A gate pier is still proposed close to the protected structure as it is considered this would appropriately identify the exit and also provide a form of protection to the protected structure from exiting motor vehicles. If the Council still wishes to omit this pier, it is invited to do so by way of planning condition. No gates are proposed.

2. Roads. The applicant is requested to provide:

(A) A stage 1 road safety audit with regard to the vehicular access/egress point.

A stage 2 road safety audit was conducted by Traffico Ltd. and it is in Appendix A of the enclosed Trafficwise report.

(B) A rationale for the choice of vehicular access location, and to consider if this is the safest access point. Alternative access points include access from the west (via Courthouse apartments

access street - not taken in charge), and from the north-west (via western access around protected structure).

This issue has been assessed by Trafficwise; and the Council is referred to paragraphs 2.4 – 2.7 of their enclosed report. Neither of the suggested alternative means of access were available and following pedestrian inter-visibility raised in response to Item 3, it was recommended to reverse the circulation regime within the proposal.

- 3. Street Layout. In order to address the issues listed below , the applicant is requested to provide: a revised street layout and surface material treatment details, including as necessary works to the public realm on Main Street. The layout should be fully dimensioned, include road-markings/signage, kerb radii, road widths and sightlines, surface and lining details:**

(A) There would be poor visibility at the vehicular access junction, with vehicles exiting without full sight of pedestrians crossing. A revised layout should prioritise pedestrian movement, comfort and safety as reflects the village centre setting (reflecting also the public open space amenity to the rear if that is proposed).

This is addressed in section 2.9 of the Trafficwise report and as shown on the revised site layout plan on the Collins Maher Martin Architect drawings.

(B) The access street bisects the area of potential public open space, and is routed around a new car park. Notwithstanding the request for detail on the car park, it is considered that the layout duplicates vehicular roadspace unnecessarily, to the detriment of public amenity space. Additionally the access road is provided with loose corners. The access street and parking should be integrated with one carriageway provided, and designed so as to maximise the quality and quantity of a single useable green space within the site.

See Drg. No. FI-05D by Collins Maher Martin Architects that shows the revised road layout for the proposed development and section 2.10 in the Trafficwise report. It is submitted that this revised layout complies with the requirements in item 3(b).

(C) The pedestrian footpath contains a number of staggered turns, which would provide difficulties for lesser able pedestrians and in design terms relegates the pedestrian to a peripheral consideration. Applicant to provide a road layout drawing that shows a formal road and footpath delineated with continuous unstaggered kerbing, and that runs from the vehicular access with a minimum width of 1.8 m throughout the development.

See Drg. No. FI-05D by Collins Maher Martin Architects that shows the revised road layout for the proposed development and section 2.11 in the Trafficwise report. It is submitted that this revised layout complies with the requirements in item 3(c).

(D) The pedestrian connection to Forest Hills is welcome in principle and would open up permeability in the village core. The footpath would suffer from a lack of passive surveillance and would have a closed, narrow, alleyway character, for that stretch to the west of unit No. 9. The footpath should be widened and opened up to passive surveillance. This can be achieved with the reorientation and/or reconfiguration of units 9 - 12 to align with units 1 - 8, with provision of a turning circle as appropriate for traffic.

See Drg. Nos. FI-01D and FI-05D by Collins Maher Martin Architects and section 2.12 in the Trafficwise report that shows the revised road layout for the proposed development to provide passive surveillance and a turning circle. Due to these revisions, the number of proposed units has reduced from 12 to 11.

4. **Roads - Swept Path Analysis.** It is unclear if certain vehicles can access and move around the development. The applicant is requested to provide swept-path analysis demonstrating:
- i. **Emergency vehicle access/egress/turning throughout the site**
 - ii. **How cars egress from parking at No. 12 (note: provide similar indications if layout is revised).**
 - iii. **how perpendicularly parked cars can reverse into and/or out of car parking spaces / driveways, in any instance where a 6m reversing distance clearance, is not being provided.**

These three issues are fully addressed in paragraphs 2.13 – 2.20 in the Trafficwise report.

5. **Footpath.** The site to the south is not in the ownership of South Dublin County Council. The applicant should consult with the owner(s) (which may be a management company) of the lands to the south and provide the result of these consultations as additional information. If possible, the applicant should obtain consent from the adjoining land owner for the full connection through the southern boundary of the site.

The land to the south is part of folio DN16656 (see copy of folio details attached) that was purchased by G R Holdings Limited (Limited Liability Company) 46 Upper Mount Street, Dublin 2 in November 1976. However, we have been unable to find that company or any successor in title. From local enquires, our client was informed the adjoining open space is maintained by the Council. The works proposed as part of this application are wholly within our client's ownership, so a letter of consent is not required to effect those works. Further, the issue of a letter of consent was not raised in the previous application (SD16A/0171) on this site. It is our client intention to design in a proposed pedestrian connection at the southern end of this site. If the Council is not satisfied that our client can implement these works, it is requested to omit them by condition.

6. **Public Realm - Play Areas.** The applicant is requested to submit a detailed Play Rationale and Layout Plan (separate to, but related to the Landscape Masterplan), using natural and nature-based solutions, to provide informal, impromptu and spontaneous play opportunities, along with play equipment that provides appropriate challenges for multiple age groups. The Layout Plan shall comprise the following: - - showing types of play and play area(s), - target age groups, - landform (included levels and contours) and boundaries, - design and construction details of play opportunities and facilities in respect of landform, planting, boundaries, equipment and safety surface. All play equipment and ancillaries shall conform to European Standards EN 1176-1-11 and EN 1177 Playground equipment and surfacing, and to BS/EN standards 2017/18 for Playground Installations for HIC (Head Injury Criterion) and CFH (Critical Fall Height). The applicant should show compliance with the following policy in the South Dublin County Development Plan 2022 – 2028: - Policy COS4 Objective 6; - Policy COS5 Objectives 19 to 28; - Section 12.6.10 guidance on

Children's Play Areas (noting requirements for schemes of more than 10 units and predominantly 3+ bedroom units).

The Council is referred to the attached Landscape Rationale document by RMDA Landscape Architects that addresses this item.

7. Public Realm - Landscape Plan and Details. The applicant is requested to provide additional information and consider a possible re-design to address the following issues:

(a) The applicant has not provided details as to the levels and gradients within the proposed public opens pace areas. The developer is requested to submit level details for the open space areas, this shall include cross section drawings where applicable.

(b) As required under the current County Development Plan; Development should seek to maximise the use of permeable surfaces, as well as opportunities for stormwater attenuation and storage through SuDS and limit the use of underground attenuation and storage. In addition, SuDS measures will only be accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.

(c) There is a lack of street tree planting. The applicant is requested to provide a standalone plan that clearly identifies street trees to be planted within the Public Realm and those that contain SuDS Features. On-street car parking to the north of the development shall be combined with regular tree planting and a high standard of kerbing and paving. It is a general objective that not more than five perpendicular or two parallel car parking spaces be allowed between trees. Trees shall be planted into a porous material with structural root soil and constructed tree pits between the car spaces. Tree pits shall contain SUDS features.

The Council is referred to the Landscape Masterplan and Landscape Rationale prepared by RMDA Landscape Architects that address items 7(a)-(c).

8. Public Realm - Public Open Space.

(A) The applicant should demonstrate compliance with the following policies, objectives and guidance in the South Dublin County Development Plan 2022 - 2028:

- Policy H8: Public Open Space - Section 8.4.1 in particular as it relates to public open space

- Policy COS5, COS5 Objective 4, 5, 6 and 7, and

Table 8.2 of the Plan, as they relate to the required provision (or contributions in lieu of) public open space.

The application site is zoned RES and VC in the development plan. So, from Table 8.2, the public open space provision is a minimum of 10% of the site area. A total open space provision of 616 sq.m. is provided in the revised site layout plan which equates to 12.6% of the total site area or 15.6% of the residential zoned part of the site, which is where the residential units are proposed. It follows that this revised proposal complies with Table 8.2.

(B) The revised site layout should maximise the quality of the public open space and enlarge it by way of reducing the spatial impact of access and parking arrangements.

The revised site layout has significantly increased the public open space provision and reduced the impact of access and parking arrangements – see Drg. No. FI-01D: Proposed Site Layout Plan.

9. **Green Infrastructure.**

(A) In compliance with Policy GI5 Objective 4 and section 12.4.2 of the County Development Plan, the applicant is requested to submit A Green Space Factor (GSF) worksheet for the proposed development, detailing how they have achieved the appropriate the minimum Green Space Factor (GSF) scoring established by their land use zoning. The minimum required score for the 'RES' and 'VC' zones is 0.5. A worksheet can be obtained from the SDCC Public Realm Department. Developers can improve their green factor score by retaining existing landscape features and incorporating new landscape features and GI interventions. Completed Green Space Factor (GSF) worksheets should be submitted to SDCC with the Green Infrastructure Plan and Landscape Plan for a proposed development.

The Council is referred to the Landscape Rationale and Green Infrastructure Plan by RMDA Landscape Architects that provides the GSF for the proposed development. The scheme landscape architect has also been in contact with Oisín Egan in the Council's Park's Department to discuss the GSF score and to investigate all possible options to increase the scheme's score. Our client remains fully committed to improving the GSF and is agreeable to a planning condition that requires further consultation with the Council's Parks Department to improve the GSF. The attached documents show consideration of every intervention listed in the Council's Guidance document.

As it stands, it is not possible for the scheme to meet the minimum GSF of 0.5 primarily because the site has no existing trees, hedgerows or retained open water, and nor is it proposed to provide new open water. A review of the factors for these surface types will show that all are 'multipliers' in that the factors are 1.2, 1.2, 2, and 1.5 respectively whereas the surfaces proposed all have factors below 1.0 with many 0.5 or lower. As a result, it is not possible for the proposed development to obtain the minimum 0.5 GSF even where the number of units proposed has been reduced and the open space provision and green infrastructure has been increased.

(B) In compliance with section 12.4.2 of the County Development Plan, the applicant is requested to submit a Green Infrastructure Plan which should include the following: - 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; - Site survey and analysis, identifying existing GI Infrastructure and key assets within the site; - Indicate how the development proposals link to and enhance the wider GI Network of the County; - Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site; - Proposals for identification and control of invasive species. - an overall site summary quantifying and detailing the following: tree and hedgerow removal; tree and hedgerow retention; and new tree and hedgerow planting.

The Council is referred to the Green Infrastructure Plan by RMDA Landscape Architects.

10. **Sustainable Movement - Car Parking. The applicant has not provided an explanation for the provision of car parking spaces 1 to 8 to the rear of the protected structure. It is unclear if these are proposed to serve the office premises, the village in general, or a combination. The 10 spaces (sometimes counted as 9 in the applicant's documents) proposed as visitor spaces to the residential area are not in keeping with the South Dublin County Development Plan 2022 - 2028; though there may be potential for mixed function spaces which would serve complementary uses**

(office and residential visitors) at different times of the day. The applicant shall provide a written rationale and revised plans as necessary to address these points.

There was previously 18 no. car parking spaces approved at this location under Reg. Ref.

SD16A/0171; this has been reduced to 13 no. spaces in this revised proposal. 5 no. spaces are identified for the existing offices, 7 no. spaces available as visitor spaces to serve both the offices and proposed residential units plus a mobility impaired space. There is no visitor parking within the residential portion of the development and there is not sufficient space even for short term on-street parking by visitors hence the necessity for residential visitor parking at the rear of the protected structure. No parking is being proposed for the village in general.

11. Taking in Charge. The applicant is requested to provide a Taking in Charge Plan to demonstrate which parts of the scheme are to be taken in charge.

See Drg. No. FI-09 attached as requested. However, as the Council is invited to attach a planning condition in respect of taking in charge and or a management company structure because of the mix use nature of the proposal and that the uses occupy two distinct parts of the site.

12. Archaeology.

(A) The applicant is requested to engage the services of a suitably qualified Archaeologist to carry out the Archaeological Impact Assessment (AIA) which should include a programme of Archaeological Test Excavation to respond to this request for Further Information. No sub-surface work shall be undertaken in the absence of the archaeologist without their express consent.

(B) The archaeologist shall inspect the proposed development site (PDS) and detail the historical and archaeological background of the site and the boundary walls (consulting appropriate documentary sources) and review all cartographic sources and aerial photographs for the area.

(C) The Archaeological Test Excavation must be carried out under licence from the Department of Housing, Planning and Local Government, and in accordance with an approved method statement; note a period of 5-6 weeks should be allowed to facilitate processing and approval of the licence application and method statement.

(D) Test trenches shall be excavated at locations chosen by the archaeologist, having consulted the site drawings. Excavation is to take place to the uppermost archaeological horizons only, where they survive. Where archaeological material is shown to be present, the archaeologist shall stop works pending further advice from the Department. Please note that all features/archaeological surfaces within the test trenches are to be hand-cleaned and clearly visible for photographic purposes.

(E) Having completed the work, the archaeologist shall submit a written report to the Department and the Planning Authority describing the findings of the AIA and the results of the Archaeological Test Excavation. The report shall comment on the degree to which the extent, location and levels of all proposed foundations, service trenches and other sub-surface works required for the development will affect the archaeological remains. This should be illustrated with appropriate plans, sections, etc.

(F) Where archaeological material is shown to be present, further mitigation measures will be required; these may include refusal, redesign to allow for preservation in situ, excavation and/or monitoring as deemed appropriate.

The Council is referred to the attached Archaeological Impact Assessment Report by Courtney Deery that addresses this further information item. No features, finds or deposits of archaeological significance were identified during the course of test excavation.

- 13. Village Amenities.** The proposed development does not include any public realm improvements to the front of the site, on Main Street, Rathcoole. The applicant is requested to propose public realm improvements and to provide an urban design rationale for their proposals, as part of additional information. The County Development Plan envisages some coordination between developers and the council, and this can be incorporated into a condition of permission as necessary. The applicant should demonstrate that the scheme complies with or can support the following policies and objectives of the County Development Plan:

- Policy NCBH23 Objectives 3, 4, 5, and 6;
- Policy QDP3 objective 2;
- Policy QDP6 objectives 2, 3 and 5;
- Policy EDE13 Objective 2;
- Policy SM2 Objectives 12 and 17; and
- Policy SM7 Objective 7.

Having regard to the various provisions of these policy objectives and in order to enhance the public realm between the protected structure and Main Street, this response sets out revised proposals at the front of the site – see Drg. No. FI-04D by Collins Maher Martin Architects. The revised public realm includes new boundary treatment, new landscape works with seating, and an alternative treatment to the existing red brick low wall directly in front of the protected structure. In addition, a new surface paving is proposed to replace the current macadam finish. A different treatment is proposed for the access and egress to the proposed development. It is submitted that this is an enhancement on the previously approved treatment that addresses the overall public realm enhancement requirement from the above policy objectives.

It was not considered appropriate to provide any form of parking in front of the protected structure as that would detract from the setting of the building and impact on the safe and free movement of vehicles in and out of the proposed development. All proposed parking is to the rear.

The Council is invited to address any further revision to this revised proposal for the public realm by way of planning condition as intimated in the further information item.

- 14. Irish Water.** The applicant is requested to submit a Confirmation of Feasibility from Irish Water with regard to both water supply and wastewater connections for the proposed development. See attached confirmation of feasibility from Irish Water.

We also attached revised drainage drawing to reflect the revised scheme layout.

- 15. Noise.** The site is located within the Significant Noise Boundary of Casement Aerodrome. The principles of residential development is not contested at the site; however, appropriate noise

assessment should be undertaken and mitigation measures to protect residential amenity should be proposed by way of additional information.

The Council is referred to the enclosed Acoustic Design Statement by Redkite Environmental that addresses this further information item.

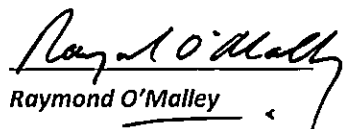
Six copies of the following plans and particulars are submitted with this response:

- (i) Architect drawings by Collins Maher Martin Architects per drawing schedule.
- (ii) Response to Further Information dated 26th June 2023 by Trafficwise including Stage 1 Road Safety Audit in Appendix A
- (iii) Copy of folio DN16656 from Land Registry
- (iv) The following plans and reports by RMDA Landscape Architects:
 - Landscape Masterplan
 - Landscape Rationale
 - Dwg. No. 01: Landscape Masterplan (Scale 1: 250)
 - Dwg. No. 02: Landscape Boundary Plan (Scale 1: 250)
- (v) Archaeological Impact Assessment Report by Courtney Deery
- (vi) Confirmation of Feasibility by Irish Water dated 17th May 2022
- (vii) Dwg. No. 2317/01 Rev A: Proposed Drainage Layout by ONCE Consultant Engineers
- (viii) Acoustic Design Statement by Redkite Environmental
- (ix) Kieran O'Malley & Co. Ltd. cover letter dated 7th July 2023

We trust the enclosed addresses the issues raised and we await the Council's decision.

Please acknowledge receipt of this further information response and direct all future correspondence to this office.

Regards,



Raymond O'Malley
Kieran O'Malley & Co. Ltd.

ROM: rom