



13th September 2023.

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



Re:

Planning Permission for a Demolition of Existing Dwelling and Construction of Residential Development Located in Clonbrone, Lucan Newlands Road, Esker Hill, Lucan, Co. Dublin

CLARIFICATION OF ADDITIONAL INFORMATION

Reg Ref: SD22A/0390

Dear Sir / Madam,

On behalf of our client, Nacul Developments Ltd, we wish to respond to your letter dated 24th May 2023, requesting Clarification of Additional Information (hereafter "CAI") in respect of the above proposed development, under Planning Reg. Ref. SD22A/0390, regarding a development proposal Clonbrone, Lucan Newlands Road, Esker Hill, Lucan, Co. Dublin.

Please note that as per your letter dated 7th June 2023, that an extension of time, until and including 15th September 2023 has been granted allowing us to submit the required information and we thank the Planning Authority for their assistance in this matter.

Our response the request for CAI is set out below, however, we wish to first point out the following:

In responding to this request for CAI, the applicant has increased the area of public open space and moved the adjoining internal road / hammerhead westwards. As a result, the red line of application has been amended and accordingly, the applicant is willing to issue revised public notices to that effect, upon request from the Planning Authority, should they deem this CAI response to be "significant".

In addition, given the alteration to the red line of application, we submit an updated letter of consent from the adjoining landowners, Eamon & Deirdre Brennan consenting to same – please refer to the enclosed letter of consent dated 6th September 2023.

Please also note that whilst not specifically required to address the below items of Clarification of Additional Information, the architects Crean Salley, project engineers Downes & Associates and landscape architects, Gannon & Associates have prepared updated, coordinated drawings that are now enclosed, as per the schedule of enclosures set out at the end of this letter – please refer to same.



Clarification of Additional Information Response:

Item 1:

The Applicant is requested to provide the following clarification in relation to the proposed drainage and water services infrastructure:

- i. Submit a report showing site specific run-off rate and run-off volume calculations to clarify what water storage capacity is required to be attenuated to match the pre-developed greenfield run off rates on site. The report shall include the following:
 - a) The total area of site in km² or ha.
 - b) Seasonally Adjusted Annual Rate (SAAR) in mm.
 - c) Attenuation coefficients of soil.
 - d) Qbar calculations and results in m³ /s or l/s.
 - e) Enlist the different type of areas (such as roofs, yard, grassed area, permeable pavement) and including their Impermeability Factor. SuDS such as the proposed swale or tree pits should not be included in the grassed area, as their attenuation volume is calculated separately.
 - f) Provide calculation for the total impermeable area in km² or ha. 1.2

Response (i):

Downes & Associates Consulting Engineers have prepared the enclosed response to this item – please refer to their enclosed drawings/report for full details, however, a summary of same is as follows:

Downes & Associates set out the Qbar calculations in their planning report submitted with the initial application details, and have provided an extract of same in their enclosed report – please refer to same. It should be noted that a practical throttle rate of 2L/sec was agreed between Ian Connolly of Downes Associates and Ronan Toft of SDCC via email on 18 November 2021. Details of the runoff rate calculation are set out in the enclosed report.

- ii. Submit a report clearly showing the required and the provided volume of storm water attenuation, namely how surface water up to and including the 1:100 (1%) year critical storm with climate change allowance (20%) will be attenuated on site.

Should there be a requirement to provide additional surface water attenuation, the above ground attenuation (such as SuDS) is preferred opposed to underground attenuation. In this case submit a report and drawings in plan and cross-sectional view with the inclusion of additional SuDS for the proposed development such as but not limited to the following:

- o Permeable pavement (for example driveways and rear patios).
- o Planter boxes with overflow connection to a public surface water sewer.
- o Swales and rill channels.
- o Grasscrete.
- o Green roofs and water butts.
- o Raingarden with overflow connection.
- o Bioretention rain gardens.
- o Water butts are additional features for SuDS but they are not considered as main features.

Response (ii):

The total storage volume required is split between a swale and an underground concrete attenuation tank. The available space on the site does not permit the entire storage volume requirement to be accommodated within the



swale. As such, the swale is accompanied by the tank as described in detail in the enclosed Downes & Associates report.

A summary of the suitability of various SuDS features is also set out in the enclosed Downes & Associates report. The proposed solution includes a swale, permeable paving, grassed areas, underground attenuation and water butts which Downes & Associates assert is more than sufficient for a development of such a small scale as that currently proposed. Please refer to the enclosed Downes & Associates report for full details on the proposed SuDS measures that are incorporated into the proposed development.

It should also be noted that the enclosed revised landscape plan (prepared by Gannon & Associates, landscape architects) incorporates a strategic integration of various Sustainable Drainage Systems (SuDS) features, designed to efficiently manage stormwater within the proposed development. These carefully selected elements align with principles of sustainability, ecological enhancement, and effective stormwater management.

At the forefront of the SuDS strategy is the allocation of a bioretention area located at the entrance corner of the development. This area functions as a natural filtration system, enabling stormwater to naturally seep into the ground. This not only helps attenuate stormwater but also significantly enhances the ecological quality of the site. The bioretention area naturally purifies stormwater as it infiltrates the soil, promoting the overall health and vitality of the local ecosystem.

In addition to the bio-retention area, the submitted landscape proposal introduces a series of rain gardens strategically positioned along the driveway. These rain gardens are accompanied by thoughtfully placed tree pits, creating a harmonious blend of aesthetics and functionality. By effectively collecting and managing stormwater, these features contribute to reducing surface water runoff. Natural infiltration processes are facilitated as stormwater gradually soaks into the soil. This approach aligns with a commitment to sustainable stormwater management and enhances the overall environmental performance of the proposed development.

Gannon & Associates have also incorporated permeable paving in both the front and back gardens. This choice of paving material significantly improves stormwater management by allowing water to permeate through the surface and into the ground. This permeability reduces the risk of excessive runoff and helps maintain a healthier balance between the development and the surrounding environment.

In conclusion, the integration of these SuDS features, bio-retention areas, rain gardens with tree pits, and permeable paving, reflects the comprehensive approach to managing stormwater within the proposed development. By combining functionality, aesthetics, and ecological responsibility, the goal is to effectively attenuate stormwater while making a positive contribution to the overall environmental well-being of the site. Please refer to page 9 of the submitted landscape design report by Gannon & Associates for an illustration of the SuDS strategy for the site.



- iii. *Submit details of the rainwater storage capacity in m³ for all proposed SuDS. Prior to the providing the above outlined information, the Applicant is advised to liaise directly with the Drainage and Water Services Department of South Dublin County Council.*

Response (iii):

Details of the proposed solutions are included in the submitted drawings prepared by Downes & Associates and a summary of same is included below:

- Swale Volume – 15m cu
- Attenuation Volume – 30m cu
- Permeable paving volume – not considered in design of attenuation and so is conservative
- Water butts – Each house is to be fitted with a 200L water butt

Please also refer to page 10 of the submitted landscape design report by Gannon & Associates for details of the proposed SuDS details i.e. rain garden and permeable paving details.

Item 2:

The proposed open space is poor in quality and would not be accepted at a development of this scale. In this regard the Applicant is requested to provide a complete set of revised drawings which demonstrate a more appropriate Public Open Space design having regard to the content of Section 12.6.10 of the South Dublin County Development Plan 2022-2028. Prior to providing a revised Public Open Space design, the Applicant is advised to liaise directly with the Parks and Public Realm Department of South Dublin County Council.

Response:

The applicant has engaged the services of Gannon & Associates, Landscape Architects to prepare a revised landscaping plan – please refer to their submitted Landscape Plan (drawing no. 23178_Clonbrone_PA_B_LP) for details. They have liaised with Oisín Egan of the SDCC Parks Department prior to the submission of this CAI response. The proposed area of public open space has been increased in size from 319sq.m to 402sq.m, which equates to an open space provision of over 12% for this infill site, and accords with the requirements of Table 8.2 of the Development Plan which requires a minimum of 10% open space provision on sites zoned RES, such as the subject site. The enlarged open space is achieved by strategically relocating the adjoining hammer head 5 meters to the west. Through this design modification, the proposed landscape provides a larger area of soft landscaping compared to hard landscaping elements. This expansion is realised by establishing a spacious open grass area and incorporating pollinator-friendly plantings with a windflower meadow mix. As for the choice of hard landscaping materials, it is proposed to use Ballylusk dust for the footpath.

The submitted landscape plan and accompanying landscape design report detail the proposed planting – please refer to same for full details. It should also be noted that the revised, submitted landscape plan introduces an engaging and interactive aspect by incorporating natural playground elements. Specifically, these elements consist of two natural components: logs and rocks, which aim to encourage users to explore and interact with their surroundings. Adding to this experience, a seating element is strategically placed near the proposed Coniferous Woodland, promoting contemplation and a connection with the surrounding natural environment.

Based on the findings of the Archaeological and Geological Heritage Impact Assessment, the site is located within an area of significant archaeological importance and historical value. Notably, an on-site discovery of a millstone and a potential grinding stone highlights the historical significance of the location. Reflecting these findings, the



enclosed updated landscape plan includes relocating them within the public open space and preserving these historically important artefacts.

Item 3:

The applicant has not provided any street trees that are up to South Dublin County Council's standards. Street Trees proposed are not classified as such if they are located in driveways. Miyawaki planting is also not considered to be street trees. The planting that has been proposed is unacceptable. The Miyawaki planting proposed differs greatly from what is widely understood to be Miyawaki planting. In this regard, the Applicant is requested to provide a more appropriate Planting Plan to include street trees and appropriate species of planting. Prior to providing a revised Planting Plan, the Applicant is advised to liaise directly with the Parks and Public Realm Department of South Dublin County Council.

Response:

The enclosed landscaping details have significantly revised and improved the provision of street trees within the proposed development. The trees, which were initially located within driveways, have been repositioned to align with the road edge along the path. Additionally, the number of trees has been increased from 4 to 6, reflecting the applicant's commitment to enhancing the tree canopy within the development.

To further ensure the long-term health and vitality of the newly planted trees, a meticulous approach has been adopted. The trees are now integrated into rain gardens, a design choice that not only contributes to stormwater management but also nurtures optimal growing conditions for the trees. Moreover, a root barrier has been proposed to encircle the trees, safeguarding against any potential root-related issues.

Regarding tree species selection, the provision of the Ginkgo biloba tree has been chosen due to its favourable root ball characteristics (r/b, 4x trpt 20-25cm gt.). This selection takes into account the tree's ability to thrive within the proposed rain garden environment while minimising potential disruptions to the surrounding infrastructure.

In an effort to increase the density of tree planting and amplify the ecological benefits, the enclosed revised landscape plan introduces a strategic addition: a screening row comprised of pleached Quercus ilex trees (r/b, 3x trpt 14-18cm gt.). The overarching intention behind this approach is to accomplish multiple objectives that collectively enrich the development's environment.

Gannon & Associates, Landscape Architects assert that at the heart of this decision is the aspiration to establish a biodiversity route, fostering a thriving habitat for local flora and fauna. By introducing a continuous row of pleached Quercus ilex trees, the aim is to create a green corridor that encourages the movement of various species and enhances the overall biodiversity within the area. This aligns with the commitment to ecologically sustainable practices and contributes to nurturing a balanced ecosystem.

Furthermore, all of the above elevates the Green Space factor score, underscoring the dedication to improving the quality of the green infrastructure within the development. The enhanced tree density and thoughtful placement of the pleached trees are geared towards achieving a higher level of green coverage, which not only adds to the aesthetic appeal but also aligns with our sustainable landscaping objectives.

In addition to the ecological considerations, the screening row of pleached Quercus ilex trees is strategically positioned to provide an increased sense of privacy and seclusion for residents. This design feature aligns with the desire to offer a serene living environment that provides residents with a tranquil and harmonious living experience.

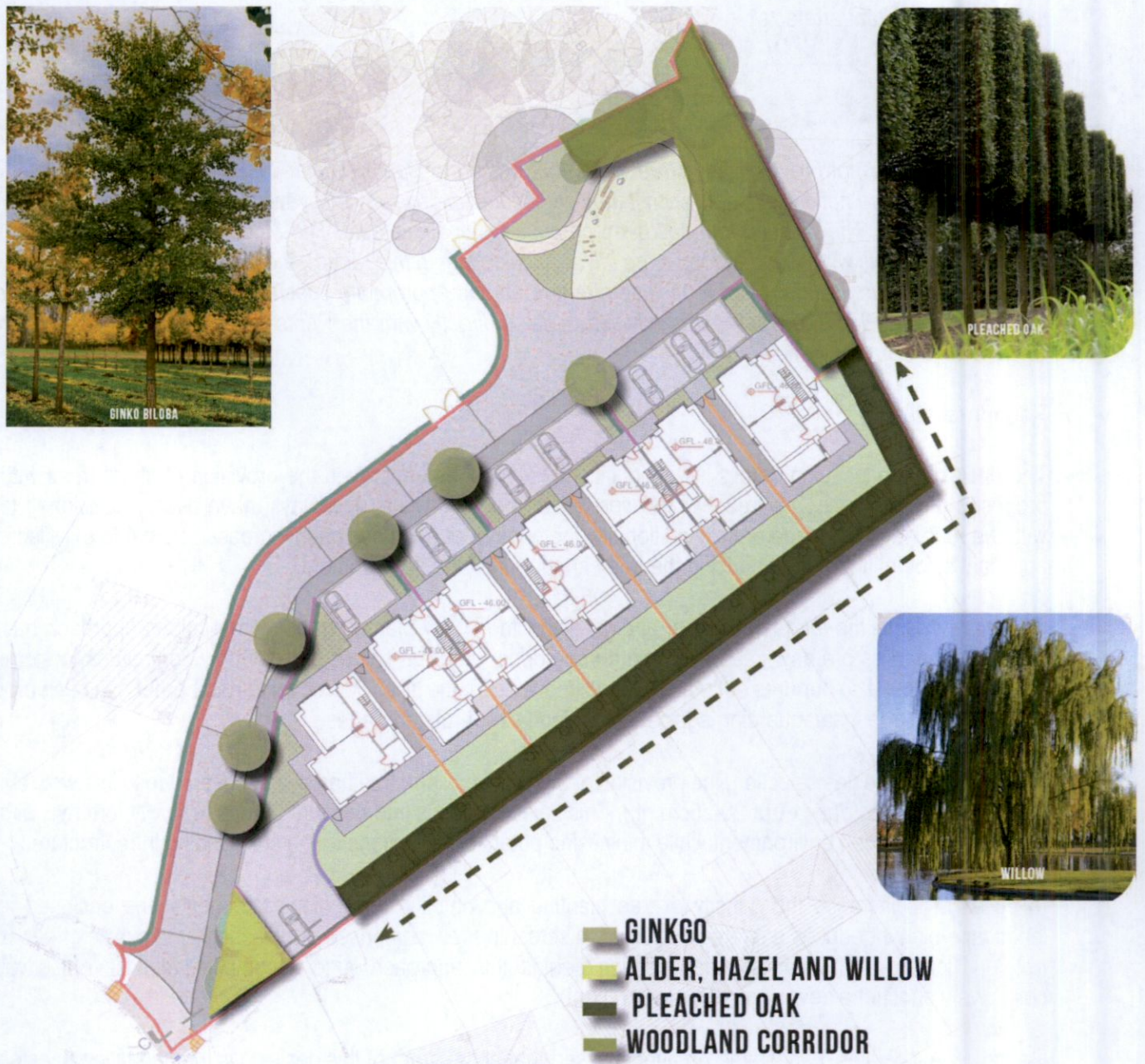


Fig. 1 – Proposed Street Tree Planting, proposed by Gannon & Associates

The enclosed landscape design report provides specification details of the proposed tree planting including tree pit detail – please refer to page 16 of their submitted report for details of same.



Item 4:

(i) *It is noted that the Applicant is proposing to remove virtually all of the existing Green Infrastructure that is currently on the site. This would result in the fragmentation of the Green Infrastructure Network and would be unacceptable to the Planning Authority. In this regard, the Applicant is requested to provide a Green Infrastructure Plan (to be coordinated with the revised Landscape Plan, Planting Plan, Drainage Plan and SuDS Plan) that includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local steppingstone.*

Response:

Gannon & Associates has prepared the submitted Green Infrastructure Strategy, which is enclosed in their submitted landscape design report (pages 17-19). They assert that the strategic location of the site within the Liffey Valley Green Infrastructure Corridor emphasises the importance of seamlessly aligning the proposed development with this broader ecological framework. To achieve this, the proposed measures fully adhere to the principles and objectives set by both local and regional Green Infrastructure initiatives.

Recognising the findings of the tree survey, Gannon & Associates concur with SDCC's assessment that a significant portion of the existing trees have limited quality and value, and a short lifespan. Therefore, keeping them would not be practical. The submitted revised landscape plan takes this into careful consideration and offers a solution by introducing screening trees along the southern boundary at the back of the gardens. Additionally, the applicant is firmly committed to re-establishing a Coniferous Woodland along the eastern boundary, a commitment that greatly enhances the Green Infrastructure Network within the site.

The enclosed updated landscape plan presents a multifaceted enhancement that includes features of a Sustainable Drainage System (SuDS), an increased presence of greenery, and improved public open space. Importantly, this plan demonstrates a comprehensive commitment to safeguarding and revitalising the existing on-site Green Infrastructure (GI) assets. Furthermore, it meticulously incorporates provisions that promote connectivity to both local and primary GI corridors, effectively creating a harmonious link with the broader ecological context. A pivotal aspect is the deliberate inclusion of elements that enable the site to serve as a local stepping stone within the larger Green Infrastructure Network. This holistic approach underscores a dedication to a development that embodies environmental responsibility, enhanced aesthetics, and a mutually beneficial relationship with the surrounding ecosystem.

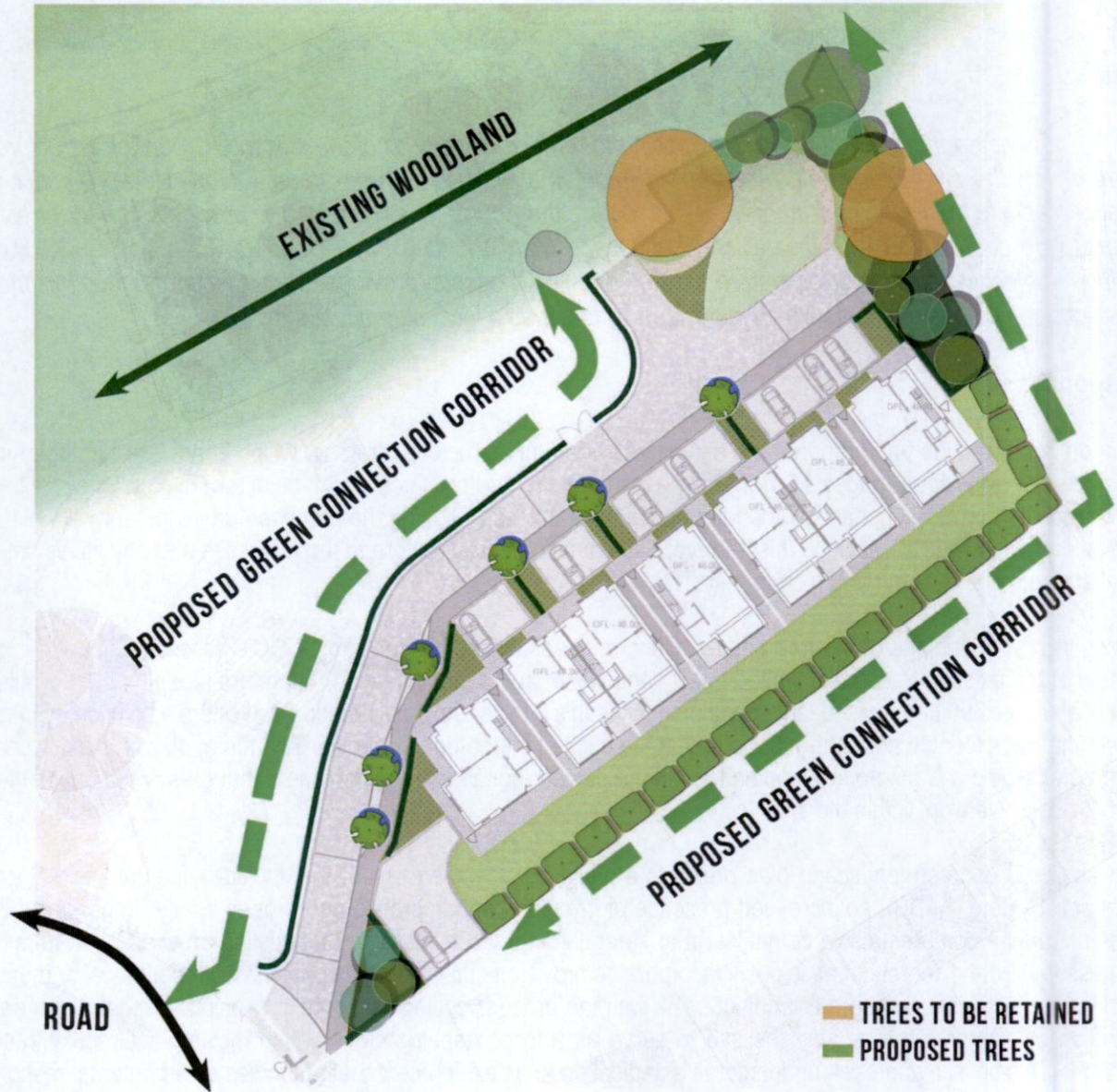


Fig. 2 – Proposed Green Infrastructure Strategy

(ii) It is considered that the proposed development fails the minimum requirements to pass the Green Space Factor. The Applicant is requested to provide a revised Green Space Factor worksheet which provides an accurate calculation of the greening factors on the subject site. Prior to providing a revised Green Infrastructure Plan and Green Space Factor Worksheet, the Applicant is advised to liaise directly with the Parks and Public Realm Department of South Dublin County Council.

Response:

Under section 3.5 (page 20) of the submitted Landscape Design report, updated calculations of the Green Space Factor are outlined, now yielding a Green Space Factor score of 0.55, a result that is considered to align with the expectations set forth by the South Dublin County Council – please refer to same for details.



Conclusion:

This application for permission proposes the development of 7 no. dwellings on lands zoned objective RES: "To protect and/or improve residential amenity", therefore, the principle of the proposed development is acceptable, with this application for permission proposing to provide for traditional family housing that is compatible with the land use zoning objective attached to the site and is of a scale that maintains the established character of the receiving environs.

The enclosed landscaping details demonstrate that the area of public open space has been increased with significant improvements proposed to the design and provision of planting, including street trees. The applicant's landscape architect, Jonathan Gannon of Gannon & Associates, met with Oisín Egan from SDCC Parks Department and based upon feedback received, the proposed landscape design is put forward for permission. At this stage of this application and given the planning history attached to the site, it is considered that the enclosed landscaping details fully address the matters that required clarification and as such the permission being sought can now be granted permission.

Overall, the type and scale of development put forward for permission has been judiciously considered in terms of the planning history attached to the site, the receiving environs, the character of the area and the size, configuration and orientation of the site. A high quality of architecture and landscape architecture have been applied to the scheme which is considered to be an appropriate scale and design for the site.

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

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

We consider that all the items that required Clarification of Additional Information have been fully addressed. Having regard to all of the information now submitted, as well as the content of the overall planning application details submitted under Ref. SD22A/0390, along with the planning history and context of the site, it is considered that the proposed development accords with the proper planning and sustainable development of the area and will provide an appropriate redevelopment of the overall site, and therefore ought to be granted permission. We trust that the Planning Authority will give due consideration to the merits of the subject application, and we look forward to a favourable decision in due course. Please refer to the pages over for a full list of enclosures.

Yours faithfully,

Tracy Armstrong, BA, MRUP, MIPI, MRTPI

Armstrong Fenton & Associates.



Appendix A

List of Enclosures:

Prepared by Armstrong Fenton Associates:

Drawing/Doc No.	Title	Scale
N/A	Response to CAI	A4 Document

Prepared by Crean Salley Architects:

Drawing/Doc No.	Title	Scale
85675-CFI-001	Site Location Map	1:1000 @ A3
85675-CFI-002	Site Layout Plan - Existing	1:500 @ A3
85675-CFI-004	Site Layout Plan – Proposed	1:500 @ A3

Prepared by Gannon + Associates Landscape Architecture

Drawing/Doc No.	Title	Scale
23178	Green Infrastructure	A3 Document
23178_Clonbrone_PA_B_LP	Landscape Plan	As Shown

Prepared by Downes Associates Ltd

Drawing/Doc No.	Title	Scale
20047	Civil Engineers Response to Request for CAI	A4 Report
5001	Proposed Site Layout and Water Services	1:250 @ A1
5004	Proposed Swept Path Analysis Refuse Vehicle	1:250 @ A1
5005	Proposed Swept Path Analysis Fire Tender	1:250 @ A1
5007	Proposed Signage & Road Markings	1:250 @ A1