# Response to Opinion ABP.Ref.310111-21

Strategic Housing Development at Stocking Lane, Ballyboden, Dublin 16

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MacCabe Durney Barnes 20 Fitzwilliam Place, Dublin 2 T:+353 1 6762594 F+353 1 6762310

W: www.mdb.ie



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## 1 Introduction

This report provides a response to Item 12(f) of the Application Form. The opinion issued by An Bord Pleanála in relation to ABP.Ref.310111-21 stated that the documents submitted with the request to enter into consultations constituted a **reasonable application basis for an application for strategic housing development**.

This report accompanies a Strategic Housing Development (SHD) application to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016 on lands c.2.47 ha at Stocking Lane, Ballyboden, Dublin 16. It addresses the additional documentation requested by An Bord Pleanála.

This response should be read in conjunction with the accompanying documentation prepared by Matt Barnes Architect, AECOM (road and transportation), COB Engineers (Services), PC Roche Associates (landscape), NM Ecology (ecology), Biosphere Environmental Services (appropriate assessment), Saber Lighting (public lighting). A statement of consistency, planning report and material contravention statement has also been prepared and may be read in conjunction with this response as they also address issues raised.

The structure of this report follows the order in which the points have been raised by the Board.



## 2 Opinion

#### 2.1 Sunlight / Daylight / Overshadowing

#### 2.1.1 Opinion

'A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.'

#### 2.1.2 Response

A Daylight Analysis and Overshadowing report has been prepared by H3D. It addresses the full extent of the requirements of BRE209/BS2011. Its overall conclusion states:

'the proposed development would not cause an unacceptable overshadowing impact on the neighbouring rear garden amenity spaces.

From the Average Daylight Factor (ADF) analysis, all habitable spaces passed the BRE guideline levels. In our opinion, the proposed development is considered to provide an excellent standard of amenity from a daylight perspective.

All rear garden amenity spaces and communal spaces analysed exceeded the BRE guideline level for overshadowing thus meeting the BRE guideline levels.

All windows analysed exceeded the BRE guideline level for VSC thus meeting the BRE guideline levels.'

#### 2.2 Transportation Assessment

#### 2.2.1 Opinion

'Transportation assessment of access options between the site and Springvale to the east, including assessment of vehicular, cyclist and pedestrian access options.'

#### 2.2.2 Response

A transportation assessment of access options between the site and Springvale to the east including assessment of vehicular, cyclist and pedestrian access options is included the Traffic and Transportation Assessment Report prepared by AECOM.

The applicants wish to make specific comments on the issues raised, as follows:

#### SURROUNDING ROAD NETWORK

The regional road network consists of the following.

#### Stocking Lane (R115)

Stocking Lane extends in both a northern and southern direction towards the city centre (via Ballyboden) and the Dublin Mountains, respectively. The road is single lane in both directions



and varies in width. The carriageway is approximately 6.4m wide at the proposed site entrance. Stocking Lane is an existing Regional Road, and therefore the designated speed limit is 80km/h. On approach to Scholarstown Wood, existing 50 km/h speed limit signage is located along Stocking Lane approximately 70m north of the existing site entrance.

#### Scholarstown Road (R115)

To the north of the site and north of Stocking Lane, Scholarstown Road forms two arms of the signalised T-Junction with Stocking Lane. The carriageway is approximately 5.5m wide with approx. 1.8m wide pedestrian footpaths located on the northern side of the carriageway. Controlled pedestrian crossings are located on the Scholarstown Road / Stocking Lane signalised junction to support pedestrian crossing movements. Scholarstown Road connects onto Edmonstown Road to the east and forms two arms of a 4-arm roundabout junction with Tempelogue Road and Ballyboden Way to the west. The R115 route through to the Ballyboden Road serves the residential areas of Stocking Lane Avenue, Airpark and Prospect Manor.

#### Edmonstown Road (R116)

Edmonston Road runs parallel to Stocking Lane and is the other main regional road in the network. Traffic flows on this regional road are not as heavy as the R115.

#### Springvale (L8593)

Springvale is a local road serving the estate to the east which is a cul de sac. Traffic volumes are very low. The roads within the estate are generally 5.5m with footpaths on either side. There are acute bends through the estate to the Edmonstown Road.

#### **PLANNING POLICY AND GUIDELINES**

**The South Dublin County Development Plan 2016-2022** sets out the statutory road objectives for County. There is no roads objective relating to a creation of new link in the network with the provision of a road connecting Stocking Lane with Edmonstown via the subject site and the adjoining Springvale estate.

TM Policy 3 on Walking and Cycling states: It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment.

TM3 Objective 2: To ensure that connectivity for pedestrians and cyclists is maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, while seeking to minimise opportunities for anti-social behaviour and respecting the wishes of local communities.

TM3 Objective 3: To ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists within a safe and comfortable environment for a wide range of ages, abilities and journey types.



The **Sustainable Residential Development in Urban Areas – Guidelines for Planning Authority DEHLG** (2009) under section 3.14 states In relation the connectivity and permeability:

"Convenient access needs to be provided between and within areas, particularly to larger community and commercial facilities and to places of work. Routes within the area should be accessible for everyone and as direct as possible, and for this reason "gated estates" should be discouraged. The design process should consider what levels of permeability are appropriate for different street users, with permeability for pedestrians and cyclists taking precedence over permeability for vehicles. ..." (our underline)

#### Section 3.15 further states:

When designing a street layout for a new residential area, designers should assess the need for, and specific roles of:

....

(e) Maximum permeability for pedestrians and cyclists

....

- (g) Residential streets with limited through motor traffic; (our underline)
- (h) Consideration of provision for low design speeds (such as 30 kph) and facilities for pedestrians and cyclists;...."

The Design Manual for Urban Roads and Streets (DEMURS) indicates in section 3.4.1

"The limited use of vehicular cul-de-sacs may be considered in Neighbourhoods and Suburbs where there is a particular concern regarding through traffic........... Additional design measures should be applied to ensure that pedestrian and cycle links are not perceived as 'anti social spaces'. Links should maintain clear sight lines and be overlooked by development...."

The Guidance also indicates that shared surface zones can also be used by emergency vehicles. There is no specified width for an emergency access. Furthermore, there is no specified development size threshold above which there is a specific requirement for a second access in relation to a residential development.

#### **PLANNING HISTORY**

#### P.A Ref. Ref: D18A-0225

Planning permission was refused for a number of reasons for a development of 95 units on the site. A cycle/pedestrian ramp was included in the proposal but no road link. This was not raised as an issued in the Transportation Report for the application. No reason for refusal relating to the non-provision of a road linking to the Springvale Estate was given.

#### Pre App APB 305712-19

Pre-application for 108 units, 1 creche and 1 shop (submitted October 2019)



The Transportation Department Report (8th November 2019) states as follows;

"The Roads Department believe that a second emergency vehicle access should be developed to the boundary of the Springvale estate. There are level differences, but these can be addressed with earthworks within the subject site. This access is required to allow alternative routes in the event of an emergency. This route would also benefit the Springvale estate as it provides an alternative route for these residents in the event of a road blockage in that estate."

#### Conclusion No.1 states:

"An additional emergency/future vehicular access must be created into Springvale by lowering the subject site on its eastern boundary to tie into the levels at Springvale Estate."

The An Bord Pleanála Opinion (dated 10<sup>th</sup> December 2019) stated:

#### "4. Vehicular Links

Further consideration and/or justification of the documents as they relate to the provision of a vehicular linkages to adjoining lands. In particular the applicant is invited to explore the feasibility of providing a vehicular access to Springvale which may require re-profiling of the site to provide this vehicular access to the east, or to provide a rationale/justification for the access arrangements/links in their final application."

Meetings were held with the Transport section on the Council on the 5<sup>th</sup> May 2020 and 11<sup>th</sup> June 2020. The Council initially at that stage sought a full vehicular link to Springvale. Following discussions, rising bollards, which would be raised during the AM peak period, were incorporated into the eastern link to Springvale. This was to avoid rat-running through the proposed development and Springvale during the morning peak which would otherwise have occurred when linking two regional roads, Stocking Lane (R115) and Edmonstown (R116). With the proposals in place, the Council subsequently issued a letter of consent which allowed for the application to be submitted.

#### SHD Application ABP-308763-20

The application was submitted in November 2020, which included restricted vehicular access to Springvale with the use or rising bollards during the AM peak. Cycle and pedestrian access were open at all other times.

The Roads Department of the 22<sup>nd</sup> January 2021 stated in relation to the connection to Springvale states that "SDCC recommend that this link remains open at all times". The Planning Report of the 1st February 2021 recommended under condition 2

- (i) The Springvale vehicular access street shall be open at all times and provided without bollards, and all sections of the access street shall be taken in charge.
- (j) The Springvale vehicular access street shall be modified as follows: the road width should be 6.0m at the junction with the Springvale estate and the narrow section should be 20m further west. This will avoid stopped vehicles at the junction which may cause a traffic hazard.

The Inspector considered the matter is some detail. In relation to the pedestrian and cycle access to Springvale, section 12.7.13. of his report, he concludes:



"I am satisfied that the provision of this pedestrian and cyclist route would support planning policy and would not be detrimental to road safety or the amenities of residents within Springvale."

In relation to the restricted use of the through route (AM restrictions), section 12.7.17 of the Inspector's report noted that the proposed development

"...would substantially increase traffic movement from the development and other areas directly passing 17 of the houses within Springvale and at the junction with Edmondstown Road........ I would also note that while a roadway width of approximately 6m running through Springvale is available, the alignment of the road features relatively acute bends, steep inclines and the road is also used informally for car parking by residents."

#### Section 12.7.18 of his report states:

"In conclusion, I am satisfied that sufficient rationale or justification for the vehicular route through Springvale, either in a permanent or for exclusive periods of the day, is not in evidence nor has it been provided as part of the application. According to the Guidelines for Planning Authority on Sustainable Residential Development in Urban Areas, the principles of connectivity and permeability should influence the design and layout of urban housing, and national planning policy provides a clear preference in the prioritisation of walking and cycling accessibility. Local planning policy, including policy TM3-Objective 2 of the Development Plan, and the Permeability Best Practice Guide clearly support the provision of a competitive advantage to walking and cycling over other modes. Consequently, this secondary vehicular access aspect of the proposed development should be omitted in the event of a permission and a revised layout for the associated area should be provided as a condition, in the event of a grant of planning permission. Accordingly, a grant of permission for the proposed development would need to ensure that the development would be capable of solely being served by the proposed vehicular access off Stocking Lane, which I consider directly below.' (our underlining)

#### **OPTIONS CONSIDERED**

Section 7.14 of the Development Management Guidelines indicates that all substantial reasons for refusal should be given in any decision. Accordingly, and having regard to the fact that the refusal of the SHD did not refer to the access arrangements to Springvale and that the Inspector had indicated that in the event of a grant of permission the secondary vehicular access to Springvale should be omitted, the scheme put forward at pre application consultation phase for the current application was for a cycle and pedestrian only link to Springvale.

Three options are considered in response to Item 2 of the Opinion. They are:

- **Option 1** Full unrestricted vehicular, pedestrian and cycle connection through to Springvale (option currently sought by the Council)
- Option 2 Vehicular, pedestrian and cycle connection through to Springvale, but restricted in the AM peak through use of barrier or other traffic control measure (option proposed in previous SHD application)
- **Option 3** Cycle and pedestrian connection only to Springvale (option currently proposed)



These options are assessed against grounds

- a) Policy
- b) Amenity
- c) Traffic and Roads

#### **ASSESSMENT OF OPTIONS**

#### Option 1 - Full unrestricted vehicular, pedestrian and cycle connection

#### Policy

There is no road objective in the Development Plan which seeks a new link in the road network between the two regional roads of Stocking Lane and Edmonstown. In addition, there is no policy which determines the threshold number of units above which a second access needs to be provided to a housing development. While the Sustainable Residential Development in Urban Areas Guidelines promote permeability between residential areas, paragraph 3.14 indicates that permeability for pedestrians and cyclists takes precedence over permeability for vehicles. This option could potentially conflict with TM Policy 3 of the Development Plan which seeks to prioritise cycling and walking over car movements in traffic calmed streets.

#### Amenity

The potential for adverse impact upon the amenities of residents of Springvale was highlighted in the Inspector's report in relation to the previous SHD application on site (Ref: ABP-308763-20). It would draw external traffic between the regional roads, Edmonstown Road and Stocking Lane through both the Springvale and the proposed development. The volumes of traffic are likely to be such as to erode the amenities of existing and future residents. The eastern home zone within the scheme would be undermined by through traffic and increase in traffic flows through Springvale could alter the relatively quiet residential environment there, particularly during peak periods.

#### **Traffic and Roads**

In the event that an unrestricted through route from Stocking Lane to the Edmonstown Road is facilitated via the site, this would result in a significant volume of traffic utilising the proposed development vehicular connection into Springvale. Given that both the proposed development and Springvale are residential estates this would result in a car dominant neighbourhood roads which raises further concerns around road safety for existing and perspective residents, which is not in line with the guidance provided in the Design Manual for Urban Roads and Streets.

The Inspector in the previous SHD application noted that there were acute bends in Springvale and it was not designed to cater for through traffic.

#### Option 2 - Restricted vehicular access during AM peak and full pedestrian and cycle connection

#### Policy

The Sustainable Residential Development in Urban Areas Guidelines do promote permeability between residential areas, but paragraph 3.14 indicates that permeability for pedestrians and cyclists as taking precedence over permeability for vehicles. While this option may not be evidently in conflict with TM Policy 3 of the Development Plan, the Inspector on the previous



SHD application referred to TM3 Objective 2 which emphasised the importance of pedestrian and cycle connectivity while respecting the wishes of local communities.

#### **Amenity**

The potential for adverse impact upon the amenities of residents of Springvale was highlighted in the Inspector's report in relation to the previous SHD application on site (Ref: ABP-308763-20). While the restriction of traffic during the morning AM peak would significantly reduce the impacts upon amenities in comparison with Option 1, there is potential for an impact upon amenities of existing and future residents during the rest of the day.

#### **Traffic and Roads**

Owing to the restrictions on the Springvale link, with the use of rising bollards in the morning peak period, the impact of the development during that period would be the same as for Option 3. All traffic would exit the scheme onto Stocking Lane during the AM peak and the TTA accompanying this application clearly demonstrates that the road network on the western side of the site can accommodate the development.

The Inspector in the previous SHD application noted that there were acute bends in Springvale and it was not designed to cater for through traffic. This option includes the use or rising bollards at the top and bottom of the link which would be up outside the morning peak period. Issues of management, operation and safety were raised in relation to this option in the last application. These matters could be addressed by way of detailed design and agreement with the Roads Department.

#### Option 3 - Full pedestrian and cycle connection

#### Policy

This option appropriately balances the needs of ensuring permeability for sustainable modes of transport (i.e. cycling and walking), ensuring appropriately traffic calmed residential areas, and respecting the wishes of existing communities. It is therefore considered that it accords with section 3.14 of the Sustainable Residential Development in Urban Areas Guidelines and TM Policy 3 of the Development Plan.

#### Amenity

Generally, the amenities of existing Springvale residents and future residents of the scheme are protected as there is no through traffic. While cycle and pedestrian connections can give rise to concerns for existing residents, they will significantly benefit from being able to access bus services on Stocking Lane including local bus routes, the proposed creche and shop within the scheme and schools on Scholarstown Road.

#### Traffic and Roads

All traffic would exit the scheme onto Stocking Lane during the AM peak and the TTA accompanying this application clearly demonstrates that the road network on the western side of the site can accommodate the development.

**Option 3** is the one that has been selected for this application.



#### 2.3 Schedule of Accommodation

#### 2.3.1 Opinion

'A detailed schedule of accommodation which shall indicate compliance with relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2020, including its specific planning policy requirements.'

#### 2.3.2 Response

A detailed schedule of accommodation and housing quality assessment have been prepared by Matt Barnes Architect and is submitted as part of this application. It demonstrates compliance with the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' 2020.

#### 2.4 Building Lifecycle

#### 2.4.1 Opinion

'A building life cycle report shall be submitted in accordance with section 6.3 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long term management and maintenance of the proposed development. '

## 2.4.2 Response

A building life cycle report has been prepared by Matt Barnes Architect and is submitted as part of this application.

#### 2.5 Landscaping

#### 2.5.1 Opinion

A landscaping plan including details of all proposals for the communal open space. The landscaping plan will clearly indicate the quantum of open space provision having regard to any circulation space.

#### 2.5.2 Response

A landscaping plan and details of all proposals for the communal space has been prepared by PC Roche and Associates. Please refer to the following drawings:

- PC Roche and Associates 1490-2012 Landscape Layout
- Matt Barnes Architect 2183-14-A Communal and Public Open Space



#### 2.6 Boundary Treatment

#### 2.6.1 Opinion

Full details of boundary treatment.

#### 2.6.2 Response

Full details of boundary treatment have been prepared by PC Roche and Associates. Please refer to PC Roche and Associates 1490-2012 Landscape Layout.

As noted in section 12 of Part A of the Statement of Consistency, Planning Report and Material Contravention, the boundary treatment indicated as a dashed purple line along the southern boundary with Springvale is an indicative proposal. The matter may be addressed post planning by way of compliance with a condition.

#### 2.7 Car Parking

#### 2.7.1 Opinion

A rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.

#### 2.7.2 Response

A rationale for the proposed car parking provision is included the Traffic and Transportation Assessment Report prepared by AECOM.

The applicants wish to make specific comments on the issues raised, as follows:

#### PLANNING POLICY AND GUIDELINES

The National Planning Framework (NPF) guides national, regional and local planning decisions until 2040 as the high-level strategic plan for shaping the future growth and development.

One of the principal elements of the NPF's overall strategy for spatial planning (NPF Sections 1.3 and 2.6) is compact growth, which will include:

'Deliver at least half (50%) of all new homes that are targeted in the five Cities, and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within the existing built-up footprint.' (NPO 3b)

Of particular relevance in this instance in the National Policy Objective 13 as follows:

'In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.'

On foot of the publication of the NPF, the Sustainable Urban Housing: Design Standards for New Apartments 2020 (as amended). These Guidelines actively promote higher density in appropriate locations. The Guidelines identify three location types suitable for apartment development (section 2.4). The range of locations is not exhaustive and will require local



assessment that further considers these and other relevant planning factors. The subject site is considered to fall within 2) **Intermediate Urban Locations**, where densities in excess of 45 units per ha will apply. In Intermediate Urban Locations served by public transport or close to town centres or employment "planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard".

Under the guidelines, the worst-case scenario parking provision (i.e the highest) is for sites located in areas qualifying as 'peripheral and/or less accessible urban locations'. Under section 4.22, the 'benchmark guidelines for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.'

The South Dublin County Development Plan includes maximum standards for Zone 1 (general rate applicable throughout the County) as follows:

- Apartments and duplex standards have been superseded by the above-mentioned Apartment Guidelines.
- Houses:

1 bed unit: 1 car parking space
2 bed unit: 1.5 car parking space
3+ unit: 2 car parking space

#### **DESIGN RESPONSE**

It is proposed to provide a total of 167 car parking spaces to cater for the proposed development of which consists of the following:

152 no. residential spaces;

5 no. visitor spaces;

4 no. creche spaces;

5 no. retail spaces; and

1 no. car share space

The rationale for the proposed quantum of parking is set out in the TTA. This car parking requirement has been provided for taking cognisance of both the South Dublin County Development Plan and the Design Standard for New Apartment Guidelines as demonstrated in Section 3.9 of the Traffic and Transport Assessment. Both the South Dublin County Development Plan and the Design Standards for New Apartments have been taken as the maximum rates for car parking to be provided for the development. The car parking ratio for the residential units is 1.16 spaces per unit with the car parking being allocated as follows, with the dedicated spaces (mobility impaired, EV) being allocated to specific units:



Table 1 - Car Parking Allocation

No. and Type of Units	Ratio	Total	
21 houses	2 spaces per unit	42 spaces	
29 no. 1-bed	0.65 space per unit	19 spaces	
61 no. 2-bed	1 space per unit	61 spaces	
20 no. 3-bed	1.5 spaces per unit	30 spaces	
		152 spaces	

The applicant will also accommodate a space dedicated to a car sharing club (e.g. car club) which will benefit the prospective residents and those living in the vicinity of the site. Details of plans for mobility management are included in the TTA.

Finally, it is important to reiterate that the site is located adjacent to a bus stop which will accommodate the transport needs of the future residents.

Car parking management would be carried out by an appointed management company. The management company will be responsible for enforcing the car parking arrangements on the site which perspective residents will be made aware of prior to moving in. The management company will be responsible for the following:

- Regular checks of the car park to ensure appropriate parking.
- Internal warning signs to be erected to warn visitors of parking restriction.
- Letters to be sent to all residents informing them of the agreed parking strategy.

To conclude a range of options have been considered for the access arrangement with Springvale and it was found that Option 3 (Full Pedestrian and Cycle Connection) is the most appropriate. The car parking for the proposed development has been provided having regard to the maximum standards as set out in the South Dublin County Development Plan and to the relevant standards as set out in the Design Standards for New Apartment Guidelines with the car parking rationale detailed in section 3.9 of the accompanying TTA.

#### 2.8 Construction and Demolition Waste Management Plan

#### 2.8.1 Opinion

Construction and Demolition Waste Management Plan.

#### 2.8.2 Response

A Construction and Demolition Waste Management Plan has been prepared and are included in the document entitled "Outline Construction Management and Waste Management Plan" which accompanies this application.



#### 2.9 Public Realm Reports and Water Services Planning Report

#### 2.9.1 Opinion

'Response to issues as raised in the Public Realm Planning Report, and Water Services Planning Report dated 13th May 2020 and detailed in Addendum C of the Planning Authority's Opinion.'

#### 2.9.2 Response

We refer the Board to sections 3 and 4 of this report.

#### 2.10 Material Contravention

#### 2.10.10pinion

'Where the applicant considers that the proposed strategic housing development would materially contravene the relevant development plan or local area plan, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act of 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.'

#### 2.10.2Response

We refer the Board to the Material Contravention Statement which accompanies this application.

#### 2.11 Environmental Impact Assessment

#### 2.11.10pinion

'The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018, unless it is proposed to submit an EIAR at application stage.'

#### 2.11.2 Response

We refer the Board to Part A of the Statement of Consistency, Planning Report and Material Contravention, which accompanies this application.

#### 2.12 Consultation with Other Authorities

#### 2.12.10pinion

'Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:



- 1. Irish Water
- 2. South Dublin County Childcare Committee'

## 2.12.2Response

Both Irish Water and the South Dublin County Childcare Committee have been notified of the making of this application. A copy of the letters accompanies this application.



## 3 South Dublin County Council – Public Realm

This section specifically addresses the points raised in the Public Realm report.

#### 3.1 Main Concerns

#### 3.1.1 Public Realm Report

- 1. Additional information/detail required on proposed play items contained within the landscape proposals.
- 2. Additional information/detail required proposed kickabout pitch, proposed MUGA and Basketball throwing hoop/game court and outdoor exercise courts
- Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as, integrated/bio retention tree pits and detention basins etc.
- 4. Detailed Planting Plan required for the entire development which clearly details planting sizes and proposed numbers/densities.
- 5. Detailed boundary plan required which provides detailed information on the proposed boundary types and associated planting.
- 6. Taking in Charge Drawing Required.

#### 3.1.2 Response

- 1. Additional details are provided in relation to the proposed play items. Please refer to drawing no. 1490-2013 Detail Area Proposals prepared by PC Roche and Associates.
- Additional details are provided in relation to the proposed kickabout pitch, proposed MUGA and basketball throwing hoop/game. Please refer to drawing no. 1490-2013 Detail Area Proposals and landscape report prepared by PC Roche and Associates.
- 3. Additional details are provided in relation to natural SUDS features incorporated into the proposed drainage system for the development such as, integrated/bio retention tree pits and detention basins etc. Please refer to drawing no. drawing no. 1490-2014 Biodiversity and Planting prepared by PC Roche and Associates.
- 4. A detailed Planting Plan is provided for the entire development which clearly details planting sizes and proposed numbers/densities. Please refer to drawing no. drawing no. 1490-2014 Biodiversity and Planting prepared by PC Roche and Associates.
- 5. A detailed boundary plan is provided and provides detailed information on the proposed boundary types and associated planting. Please refer to drawing no. 1490 2012 LANDSCAPE layout prepared by PC Roche and Associates.
- 6. A taking in Charge Drawing is provided. Please refer to Matt Barnes Architect drawing no. 2183-12 Taking in Charge.

#### 3.2 Landscape Proposals

#### 3.2.1 Public Realm Report

In summary, the Public Realm report required that:

1. Proposed pedestrian connections to adjoining lands be indicated on plans.



- 2. Show how public open spaces in the wider area will link in and integrate with the proposed development.
- 3. Photomontages and cross sections at appropriate intervals, including how the development will interface with existing housing and contiguous lands.
- 4. The public realm should be integrated into the adjacent development areas, creating continuous green infrastructure connections that form both physical and bio-diversity links.
- 5. The proposed development should create positive additions to the open spaces of the area in the form of planting, permeability, and usable open space. Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with existing housing and contiguous lands. The overall aim of the landscape design should be to create a high-quality attractive environment with amenity facilities for the residents of the proposed residential development.
- 6. The subject site contains several mature trees particularly along its boundaries. It should be an integral part of the overall landscape strategy that these green infrastructural assets are retained, protected, and built upon to strengthen green infrastructural links across the site and to the surrounding environment. To mitigate the loss of trees where unavoidable, a replacement native tree and hedgerow planting program should be proposed. Trees to be removed should be replaced with species such as oak, beech, birch, pine, rowan, alder, cherry, and willow.
- 7. All proposed landscaping intended to be taken in charge shall be to a taking in charge standard that ensures ease of maintenance. This included soft landscaping details.
- 8. Appropriate cross sections drawings throughout the development are required to consider ease of maintenance and usability of the open spaces. Any proposed levels changes or existing level changes shall be outlined. Slopes to be no greater than 1:8 on any open spaces to be mown.
- 9. Any houses siding onto open space should have dual aspect in order to have all areas overlooked and avoid hidden areas where anti-social activity predictably occurs.
- 10. Any proposed street trees should have a suitable load bearing tree pit that incorporates SuDS features into the tree pit. SuDS features will reduce excess water going into the drainage outlets. The applicant shall submit detailed cross sections for trees in the hard and soft landscape
- 11. Details of the kickabout areas including drainage to be agreed with Public Realm.
- 12. Details of proposed MUGA to be agreed with Public Realm.
- 13. Details of proposed basketball throwing hoop, game court and exercise courts to be agreed with Public Realm
- 14. Street Trees shall be planted in the Public Realm with suitable tree pits that incorporates SuDS features in accordance with SDCC Adamstown Street Design Guide, Section 6.3 Side Street Design.
- 15. The applicant should provide large 20-25cm girth tree on main streetscapes in the proposed development and 18-20cm girth on secondary streets/residential areas.
- 16. In relation to the proposed development, no more than 60% of residential car parking spaces shall be provided as private in-curtilage parking spaces in the development area.
- 17. On-streetcar parking 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.



- 18. The applicant should have suitable tree pits that attenuate water within hard surface areas. The applicant should clearly outline how SuDS features within the tree pits will function.
- 19. The applicant is requested to submit a fully detailed Planting Plan for the entire development
- 20. The planting plan should provide the following information:
  - a. Location of species types, schedule of plants noting species, planting sizes and proposed numbers/densities where appropriate
  - b. Implementation timetables.
  - c. Detailed proposals for the future maintenance/management of all landscaped areas

#### 3.2.2 Response

- 1. Proposed pedestrian connections to adjoining lands are showed on PC Roche and Associate drawing no. 1490-2016 Site Local Context
- 2. Integration and linkages of the public open spaces in the wider area will link in and integrate with the proposed development. This has been considered as part of the design rationale. At the outset, it should be reiterated that the site is zone RES and therefore for residential development. In order to maintain existing ecological corridors, a large number of trees are proposed for retention (see drawing TSTO005 102 Tree arboricultural impact). The proposed development includes new planting and wildflower meadows to reinforce the ecological corridors which may be disturbed as a result of the change from the current agriculture use to the proposed residential use. In addition, public open spaces are proposed in four areas of the site. These are connected to other areas in the vicinity through sustainable. Those areas are used as open space incidental to a primary residential use (such as in Scholarstown Wood to the west) and areas zoned for open space in the County Development Plan. Please refer to figure 1 below.





- 3. Please refer to CGIs by Digital Dimensions and cross sections at appropriate intervals by Matt Barnes Architect.
- 4. Integration of the public realm into the adjacent development areas, creating continuous green infrastructure connections that form both physical and bio-diversity links are illustrated in figure 1 above and drawings by PC Roche and Associates.
- 5. Please refer to CGIs by Digital Dimensions and cross sections at appropriate intervals by Matt Barnes Architect.
- 6. Please refer to drawings and report by PC Roche and Associates and the Tree Protection Strategy by CMC Arboricultural Consultancy
- 7. Please refer to taking in charge drawing no. 2183-13A Taking in Charge by Matt Barnes Architects and drawings by PC Roche and Associates.
- 8. Please refer to PC Roche and Associates drawing no. 1490-2013 detail are proposals. Generally no slopes are greater than 1/8 to the exception of some small patches which are proposed to be planted with native wildflowers. These will have a specific mowing regime with four cuts per seasons. Planting of native wildflowers has been selected to reinforce green infrastructure corridors providing for pollinator friendly areas within the development.
- Houses siding onto open space are all dual aspect to have all areas overlooked.
- 10. Please refer to PC Roche Associate drawing no. 1490-2014 Biodiversity and Planting Proposals.
- 11. Details of the kickabout areas including drainage will be agreed with Public Realm on receipt of planning permission.
- 12. Details of proposed MUGA will be agreed with Public Realm on receipt of planning permission.
- 13. Details of proposed basketball throwing hoop, game court and exercise courts will be agreed with Public Realm on receipt of planning permission.
- 14. Please refer to drawings and report by PC Roche and Associates.
- 15. Please refer to drawings and report by PC Roche and Associates.



- 16. No more than 60% of residential car parking spaces is provided as private in-curtilage parking spaces in the development area. The proposed development includes a basement car park.
- 17. On-streetcar parking is combined with regular tree planting and a high standard of kerbing and paving.
- 18. Please refer to drawings and report by PC Roche and Associates.
- 19. Please refer to PC Roche and Associate drawing no.
- 20. 1490-2014 Biodiversity and Planting Proposals.
- 21. The planting plan provides the following information:
  - a. Please refer to PC Roche and Associate drawing no. 1490-2014 Biodiversity and Planting Proposals.
  - b. This may be agreed on foot of receipt of planning permission.
  - c. Please refer to report by PC Roche and Associates.

#### 3.3 Open Space Provision

#### 3.3.1 Public Realm Report

The applicant is to provide in table Form the % Open Space for the proposed Development.

#### 3.3.2 Response

This table should be read in conjunction with Matt Barnes Architect dwg no. 2183-14-A Communal and Public Open Space

Name of open space	Size (sqm)	% of developable area	
Public Open Space 1	1,270	5.27	
Public Open Space 2	1,030	4.27	
Public Open Space 3	770	3.19	
Public Open Space 4	440	1.82	
Total (sqm)	3,510	14.55	
Site Developable area	2.41 ha or 24,100 sqm		

#### 3.4 Protection of Existing Trees

#### 3.4.1 Public Realm Report

Recommendations contained within the Tree Protection Strategy by CMC Arboricultural Consultancy shall be implemented.



## 3.4.2 Response

Recommendations will be implemented on foot of planning permission.

## 3.5 Play

#### 3.5.1 Public Realm Report

The applicant should consider the inclusion of universally accessible equipment with the play proposals.

#### 3.5.2 Response

The applicants will agree the inclusion of universally accessible equipment on foot of planning permission.

#### 3.6 Recommended conditions

The applicants accept the conditions as set out by the Public Realm Report.



## 4 South Dublin County Council – Water Services Planning Report

#### 4.1 Surface Water Report

#### 4.1.1 Comments

'The applicant is required to submit a drawing showing the inclusion of water butts in all proposed housing units as part of further SuDS (Sustainable Drainage System) measures for the development.'

'The applicant is required to submit a revised drainage layout drawing showing the relocation of the proposed surface water attenuation system for Catchment B such that it is located a minimum of 5m away from the 600mm waterworks overflow pipe traversing the site.'

#### 4.1.2 Response

Please refer to Matt Barnes Architect drawing numbers: 2183-151-A, 2183-142-A, 2183-141-A, 2183-152-A, 2183-153-A for water butts.

Please refer to OBA drawing number 50-90-C04 Foul and SW drainage layout plan sheet 2 of 2 which shows a revised located for the proposed surface attenuation system for catchment B, away from the 600mm waterworks overflow pipe traversing the site.

#### 4.2 Flood Risk Report

#### 4.2.1 Comments

'The Developer shall ensure that there is complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use.

All new precast surface water manholes shall have a minimum thickness surround of 150 mm concrete class B.

All works for this development shall comply with the requirements of the GDRCPDW.'

#### 4.2.2 Response

There will be complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use. Please refer to the engineering drawings by OBA Consulting Engineers.

All new precast surface water manholes will be a minimum thickness surround of 150mm concrete class B.

All works for this development will comply with the requirements of the GDRCPDW. Please refer to the infrastructure report by OBA Consulting engineers.



## 5 Conclusion

The opinion issued by An Bord Pleanála stated that the documents submitted with the request to enter into consultations constituted a reasonable application basis for an application for strategic housing development. The above details indicate that all of the additional documentation raised by the Board has been fully complied with.

Dublin 2 f: + 353 1 6762310