



Planning & Development Consultants
63 York Road,
Dun Laoghaire
Co. Dublin
www.brockmcclure.ie

Senior Administrative Officer
Planning Department,
South Dublin County Council,
County Hall
Tallaght
Dublin 24

29 June 2021

Planning Application
Revisions to development permitted under
Reg Ref. SD17A/0064 and ABP Reg Ref. PL06S.249209
for 11 no. residential units at Ballyroan House, Ballyroan Heights, Dublin 16

Dear Sir/Madam,

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin have been instructed by our client, Homeland BRH Limited., 8 Sandford Road, Ranelagh, Dublin 6, to lodge this planning application to South Dublin County Council for a development proposal at Ballyroan House, Ballyroan Heights, Dublin 16 (D16 E8C6). This application seeks revisions to development previously permitted under Reg Ref. SD17A/0064 and ABP Reg. Ref. PL06S.249209 to provide for a revised proposal in relation to 11 no. new residential units. The revisions proposed provide for an overall uplift in the development quantum from a permitted total of 18 no. units to a revised total of 24 no. residential units on site.

ENCLOSURES

The enclosures submitted with this application as outlined below:

No	Items	Consultant	No. of Copies	Copy/Original
1	Completed Application Form	BMC	1	Original
2	Newspaper Notice Published in The Irish Daily Star = 29 June 2021	BMC	1	Original
3	Site Notice - Erected at 3 locations on 29.06.2021	BMC	1	Copy
4	Letter of Consent from Owner	-	1	Copy
5	Architectural Drawings: <ul style="list-style-type: none">• Set of Architectural Drawings• Schedule of Accommodation• Drawing Register	LHA Architecture	10	Copies
6	Part V Proposals: <ul style="list-style-type: none">• 1 x Drawing• Schedule of Accommodation• Housing Letter	LHA Architecture	10	Copies
7	Engineering Drawings Cover Letter	Corrigian Hodnett Consulting Engineers	10	Copies

Ballyroan House, Ballyroan Heights, Dublin 16 - Cover Letter for Planning Application

8	Landscape Masterplan	Austen Associates	10	Copies
9	Architectural Heritage Impact Assessment	Rob Goodbody	10	Copies
10	Planning Fee: €997.80	Cheque	1	Cheque

SITE CONTEXT

As identified in Figure 1 below, the site is generally located at 'Ballyroan House', off Ballyroan Heights, Dublin 16 (D16 E8C6) and is proximate to the areas of Knocklyon, Ballyboden, and Willbrook, Co. Dublin. The extent of the site is identified as c. 1ha and it is bounded to the south and east by a residential development known as Elkwood; to the west and south by a residential development known as Ballyroan Heights; and to the north by a residential development known as Templeroan Park. The site is also proximate to Elkwood playing fields, Scoil Naomh Pdraig, Coláiste Éanna and Sancta Maria College.



Figure 1 Aerial Photo with site outlined in Red

The site at present comprises:

- **Ballyroan House** (A protected Structure RPS Ref.275), which is described as "Detached five-bay three-storey house, c.1850. Three-bay two-storey wing to east" in the National Inventory of Architectural Heritage (Reference 11216052).

The extent of this current revisions application relates to this protected structure and lands to the immediate east of the house.

- **Associated Outbuildings** (ranging from 1-2 storeys) including:
 - Stable Block (Former Office Accommodation/Garage)

- Printworks
- Later rear extensions and an old ruin to the gable of the main house.

These outbuildings are in receipt of permission for demolition in line with development permitted under Reg. Ref. SD17A/0064 and ABP Reg. Ref. PL06S.249209. There are no further changes proposed to this element of the permitted development by way of this current revisions planning application.

PLANNING HISTORY

Reg Ref: SD17A/0064 - A planning application was submitted to South Dublin County Council in March 2017 for a residential scheme of 23 no. residential units comprising 21 no. houses and 2 no. apartment units. Following a request for Further Information, the scheme was revised to provide for 21 no. units comprising 19 no. houses and 2 no. apartment units. Permission was granted for the proposal on the 15 August 2017, subject to 23 no. conditions. Condition no. 2 specifically, omitted 3 no. units from the overall development quantum, which in effect, granted permission for 18 no. residential units.

ABP Ref PL06S.249209 - A first and third party appeal was lodged to An Bord Pleanála in relation to the above file. An Bord Pleanála upheld the decision of the Planning Authority and granted permission for the proposed development subject to 25 no. conditions. Condition no 2. required the omission of units F2, E1 and E2.

In effect, there is an existing permission on this site for c. 18 no. residential units. This permission is due to expire in 2023. We confirm that no commencement notice has been lodged for this application nor have any works being carried out to date. The applicant is now seeking revisions to the development as permitted to provide for an overall uplift in unit numbers across the site, which is a response to the current national policy mandate for the delivery of residential units at appropriately zoned and serviced sites.

For clarity, development as permitted for house units Type B (13 no.) and Type C (3 no.) remain unaltered as part of this permission. The extent of this revisions application relates solely to permitted Type A units (3 no.) and Type D units (2 no.).

THE PROPOSAL

The proposed development shall consist of revisions to development previously permitted under Reg. Ref. SD17A/0064 and ABP Ref. PL06S.249209 (formally referred to as Watson's Place and as agreed by compliance). The development as permitted provides for 18 residential units. The current proposal delivers an overall total of 24 no. units on site.

The current application is seeking a 5 year permission for the works proposed.

Key Revisions

Revisions generally consist of the replacement of 3 no. previously permitted house units (House Types A, A1 and A2) comprising 1 no. 1 bed house, 1 no. 3 bed house and 1 no. 4 bed house with a new proposal for 8 no. apartments comprising 2 no. 1 bed units and 6 no. 2 bed units, all located within the existing 2-3 storey Ballyroan House (A Protected Structure).

In addition, the proposal provides for the replacement of 2 no. previously permitted semi-detached house units (previously permitted House Types D) comprising 2 no. four bed house units (2 storeys) with a new proposal for 3 no. 2 bed terraced house units (2 storeys).

The new works to Ballyroan House (A Protected Structure) shall comprise the following in summary:

- (a) the refurbishment and subdivision of the existing building (approx. 761 sq m);
- (b) the demolition of extensions to the building including a two storey block work extension and a single storey extension to the rear (total demolition approx. 53 sq m);

- (c) the removal of an old ruin to the gable;
- (d) extension to the rear of the building at ground and first floor level (approx. 36 sq m);
- (e) the removal of internal walls and partitions;
- (f) modifications to elevations including the removal of windows and the provision of new window and door openings; and
- (g) the provision of new private open space terraces/balconies to the rear of the building.

All other development remains as permitted under Reg. Ref. SD17A/0064 and ABP Ref. PL06S.249209.

Open Space

The Planning Authority will note there are 3 no. separate areas of public open spaces within the scheme as follows:

- The central area of open space to the rear of the Protected Structure (621 sq m)
- The large area of public open space located to the north of the Protected Structure (1,570 sq m)
- The area of open space associated with the courtyard serving Ballyroan House (348 sq m).

As identified on Site Plan submitted herewith, a total of 2,539 sq m (25.4%) of public open space is provided for within the current proposal, which is sufficient to cater for the uplift in unit numbers. This provision is over and above the requirements of the South Dublin Development Plan 2016-2022 and the Apartment Guidelines 2020. It is worth highlighting that all open space areas have the benefit of passive surveillance in that all public open space areas are sufficiently overlooked by proposed residential units. Open space areas will be landscaped with appropriate planting and natural play areas created by mounding. We refer to the enclosed landscape masterplan prepared by Austen Associates for further details on open space and landscaping proposals.

Car Parking

A total of 43 car parking spaces are now proposed across the site as follows:

- 26 no. car parking spaces for the permitted 10 no. detached dwellings (Type B) and the 3 no. terraced houses (Type C) that remain unaltered by the current application (ratio of 2 per unit); and
- 17 no. spaces for the current proposal for 8 no. apartment units (6 no. 2 bed and 2 no. 1 bed) and the 3 no. 2 bed (ratio of 1.5 spaces per unit).

Conservation

We direct the Planning Authority to the Conservation input prepared by Rob Goodbody enclosed herewith in support of the current proposals for Ballyroan House. We wish to highlight that the design of the proposed scheme has been subject to conservation advice from the outset of the project, and we are therefore confident that the scheme is the most favourable approach to the sensitive development of the Protected Structure and adjacent lands.

We note specifically that the current proposal for Ballyroan House is considered a more appropriate proposal for the building envelope in terms of the level of intervention and extent of refurbishment proposals. The input from Rob Goodbody enclosed comments on this matter in detail.

PLANNING CONTEXT

The provisions of the South Dublin County Development Plan 2016-2022 as they relate to the subject site at 'Ballyroan House', Ballyroan Heights, Dublin 16 are detailed below.

Zoning

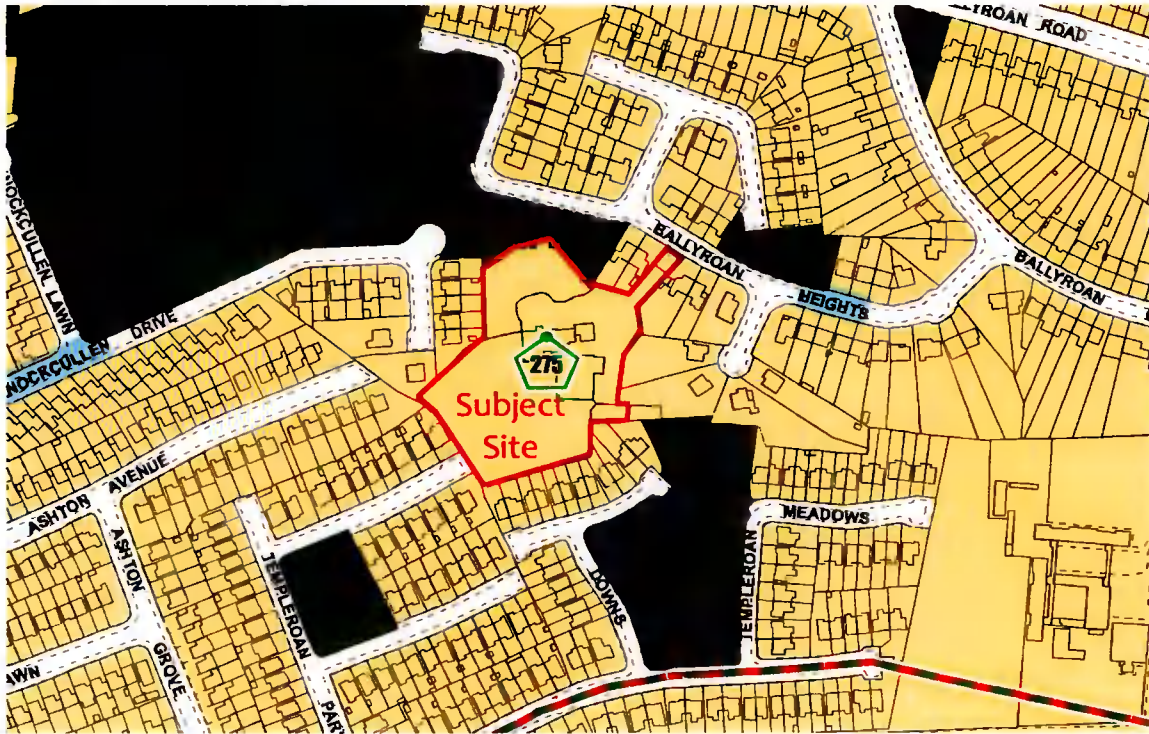


Figure 2 - Zoning Map with site outlined in Red

As per figure 2 above, the subject site is zoned 'RES' in the current development plan and the zoning objective governing the site is therefore, 'To protect and / or improve residential amenity'. Residential development is permitted in principle under this zoning objective.

Under the zoning, 'Ballyroan House' is designated as a Protected Structure (RPS No. 275). It is described under the register as a 'Three Storey House'. The Plan states that, "where a structure is protected under the RPS, the protection includes (unless otherwise stated) the structure, its interior and the land within its curtilage and other structures within that curtilage (including their interiors) and all fixtures and features which form part of the interior or exterior of all these structures."

As set out above, the applicant has retained the services of Rob Goodbody - Conservation Architect to lead the design of this project from a conservation perspective. We refer to his report submitted herewith, which is supportive of the proposal now submitted.

Residential Mix

The Development Plan states that the overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality. As the Planning Authority are aware there is an existing permission on site for 18 no. residential units. The current application provides for an overall

uplift in unit numbers to 24 no. and we note the following comparison table with regard to residential mix in this regard:

Unit	Permitted Development (18 no.)	Proposed Development (24 no.)
1 Beds	1 no. 1 bed unit	2 no. 1 bed units (2 apartments)
2 Beds	-	9 no. 2 bed units (6 apartments and 3 houses)
3 Beds	14 no. 3 bed units	13 no. 3 bed units (13 houses)
4 Beds	3 no. 4 bed units	-

Table 1 - Revised Development Mix

Evidently, a more appropriate residential mix and offering is delivered by way of the current application.

Density

H Policy 8 of the Development Plan sets out that 'It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context'. The Development Plan also states that in accordance with Departmental Guidance, the residential density (net) of new development should generally be greater than 35 dwellings per hectare, save in exceptional circumstances.

A residential density of 24 units per ha is proposed at the current site and is considered acceptable (for the current proposal) given the proposals for works to a sensitive Protected Structure; the various constraint layouts associated with the site layout at this location; and the requirement to protect established levels residential amenity. We note that the current proposal provides for an uplift in residential from 18 units per ha to 24 units per ha.

We note also the recent circular (NRUP 02/2021) issued from the Department with regard to residential density, which in effect provides for discretion in the application of a residential density of 35 units per ha at certain sites. We trust that due consideration will be given to the current proposal for density in this regard.

Height

H9 Objective 2 and H9 Objective 3 of the Development Plan are considered relevant and require the careful assimilation of any new proposals for height in the context of existing residential development.

We note that development proposed in this case is 1-3 storeys in nature. This is considered appropriate to the subject site given the presence of the 3 storey Protected Structure that currently exists on site and given that there are considerable separation distances maintained between the proposed residential units and existing residential development in the area. We can confirm that there is no additional height proposed within the Protected Structure in that the height limits currently set by the building envelope are maintained. The proposal for 3 no. 2 bed houses to the gable of the protected structure extend to 2 storeys and are considered appropriate to the site and subservient to the heights established by the Protected Structure on site.

Public Open Space

H Policy 12 and H12 Objective 1 require the delivery of a hierarchy of high quality public open spaces that comply with quantitative standards of the Development Plan. It is stated that open Space must be an integral part of the design and 10% of the total site area should be reserved for open space. The current proposal provides for a total of 2,539 sq m of Public Open spaces which equates to 25.4% of the overall development, which is well in excess of the required provision.

Private Open Space

It is the policy of the Council to ensure that all dwellings have access to high quality private open space and that private open space is carefully integrated into the design of new residential developments. We note the following proposals for the proposal submitted, which are all in line with Development Plan requirements.

House Unit Type	Private Open Space	Proposal
2 Bed Houses	55 sq m	57 - 75 sq m

Table 2 - House Open Space Requirements

Evidently, the proposal for the 3 house units to the east of the Protected Structure meet with requirements.

Floor Areas for Houses

House floor area minimums and the compliance of the scheme (house proposals) with same are detailed below.

Unit Type	Houses	Proposal
2 Bed Houses	80 sq m	80 sq m

Table 3 - House Floor Area Requirements

Separation Distances

The Development Plan clearly outlines that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy. Dwellings with direct street frontage should generally include a privacy strip of at least 1 metre or a front garden. We confirm that these standards are maintained within the current proposal.

Car Parking

We note at this point that Zone 1 car parking standards are the general standards applicable throughout the county and zone 2 residential standards are for application within towns and village centres within 400m of a high-quality transport services (train, luas or bus stop with a high-quality service). Therefore Zone 1 standards below are applicable to the subject site.

Dwelling Type	Zone 1 Car Parking Requirement
1 Bed Apartment	1 space
2 Bed Apartment	1.25 spaces
2 Bed House	1.5 spaces
3 Bed House	2 spaces

Table 4 - Car Parking Standards

Based on the revised development mix for the proposed development of 2 no.1 bed apartments, 6 no. 2 bed apartments, 3 no. 2 bed houses and 13 no. 3 bed houses, there is a total parking requirement of 40 car parking spaces. We can confirm that a total of 43 car parking spaces are proposed on this site. There are 2 dedicated spaces proposed for each of the 10 no. permitted detached dwellings (Type B) and the 3 no. houses permitted in the stable block (Type C). This results in 17 no. dedicated spaces to serve the 8 apartment units (6 no. 2 bed and 2 no. 1 bed) and the 3 no. two bed terraced houses proposed.

APARTMENT GUIDELINES 2020

Within the current proposal, the applicant has endeavoured to achieve compliance with the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)'. In this regard, the housing quality assessment enclosed sets out how the 8 no. proposed apartment units comply with the key quantitative standards of the guidelines.

We note that whilst proposals generally deliver on the majority of quantitative standards, there is some exception to compliance in terms of unit size and internal storage requirements. It is our view that any minor deviation from the above standards is justified in this case, given the sensitive nature of the Protected Structure and the requirements to minimise the extent and level of intervention. We note the following provision of the apartment guidelines (Page 33) in this regard:

"Planning authorities are also requested to practically and flexibly apply the general requirements of these guidelines in relation to refurbishment schemes, particularly in historic buildings, some urban townscapes and 'over the shop' type or other existing building conversion projects, where property owners must work with existing building fabric and dimensions. Ultimately, building standards provide a key reference point and planning authorities must prioritise the objective of more effective usage of existing underutilised accommodation, including empty buildings and vacant upper floors commensurate with these building standards requirements."

We trust that consideration will be given to the above provision in review of the current proposals.

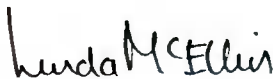
PART V

The applicant is currently in negotiations with the Housing Department in order to discharge his obligations with regard to this site. We refer also to the attached correspondence issued to Homeland Projects (applicant for the parent permission SD16A/0064 and PLo6S. 249209) dated 15 June 2021, which confirms that Homeland Projects have engaged with the Housing Department regarding a Part V proposal for this overall site. The Part V proposal provides for 2 x 1 bedroom apartments and details of this proposal are enclosed herewith for validation purposes. It is stated in the correspondence that subject to the issue of a grant of permission, the unit no's, types, location, and costings shall be agreed with the Planning Authority.

CONCLUDING COMMENT

We confirm that we act for Homeland BRH Limited and request that all future correspondence in relation to this matter be directed to this office. If you have any queries, please contact me directly.

Yours sincerely,



Linda McEllin
MRUP MIPI
linda@brockmclure.ie

 Ph: 087 6301678