

**REQUEST FOR INFORMATION**

Date of Decision: 18 Oct 2021  
Decision No: 1367  
Registered Reference: SD21A/0233  
Registration Date: 23 Aug 2021.  
Location: 1 Killakee Park Dublin D24 W9T2.

Further to the request for further information and our discussion with the planning officer and traffic department please find attached our response to the items raised in your letter of the 16th October 2021. The following comments are given following consultation with our clients, the planning department and traffic departments of SDCOCO. Having spent more than six months waiting for a pre planning meeting our clients who are eager to build a house which will support them remaining in their community and addressing their need for an accessible home facilitate the principal of 'Ageing in Place' we submitted for planning without any discussions with the Local Authority.

We believe that if a pre planning meeting had taken place our proposal might have been better understood and appreciated on its own merits in fulfilling our clients requirement for 'Ageing in Place' and SDCOCO policies which support the provision of such housing.

In preparing this submission we have consulted both the planning department and traffic both of whom have been extremely helpful.

We have been careful in designing the proposed house to accord with the stated policies contained within the current Development Plan. In an area which is dominated by a single house type it is always going to be difficult when adding new housing types. The RFI while supporting our proposal asks that it accord more closely with the existing typologies building lines and building heights. This would require us to abandon the design we have proposed which we feel on balance would be contrary to the principals embodied in our design for 'intergenerational living'. We believe that our design is necessarily different from its neighbours because of its location facing a park, as a sustainable design and one which addresses the principal of 'Ageing in Place'

**RFI Item 1.**

***As per the County Development Plan Standards, the house should adhere to the existing building lines. The slight change in orientation of the proposed dwelling as compared to the existing dwelling is considered acceptable due to the site context.***

Our clients came to us to design a house which would fulfil their needs both now and into the future as their current house, to be retained, is severely compromised and inadequate for 'life long living'. They require a home suitable for older people with increasing disabilities and one which . Donal Hickey has a progressive illness which limits his movement and will progress from his current restrictive movement with walker to wheelchair. The progress of the illness will result in Donal being restricted to bed. There may also be need for and onsite care which may include a live in carer. All these consideration have been incorporated into our design using 'age friendly and universal design principals'.

Our proposal is typical of a layout which is required where dementia, Parkinson's and a broad range of progressive debilitating illnesses where the brain is damaged by injury or disease need to be accommodated. These design principals are combined with sustainable strategies required to design a low energy and near zero carbon house with those required for 'ageing in place'. All of these priorities are supported by the inclusive principals of EU policies, those of Irish Government and the stated policies of all Local authorities in Ireland.

Our proposal is a "contemporary and innovative proposal that responds to local contact are encouraged" which we understand is supported by SDCOCO policies on corner sites at 11.3.2 Residential consolidation (ii) Corner/Side Garden Sites. We have also designed a house which can be read from three sides which face Killakee Park, Killakee Green and the public open space to the north and Ballycullen Avenue to provide appropriate frontages to "avoid blank facades" to meet the criteria of Corner Sites.

**'Ageing In Place'**

The 'spectrum of housing' required to support the needs of Irelands ageing population requires options which give choice and agency to older people. This segment of Irish society has been forgotten in the housing and homelessness crisis of the last decade. This population will increase by 15% within the life of the current Development Plan. The spectrum of housing required is absent and the need more acute in certain suburbs in the county. Firhouse is a community with a very limited spectrum of housing.

Social Housing is one of the main pillars under the Government's Rebuilding Ireland Policy [Action Plan for Housing and the Homeless 2016]. The principal of housing types which provide appropriate options is fundamental to this action plan. Supporting 'specific housing needs, such as older persons, persons with disabilities' is a stated policy of SDCOCO. Our clients believe they should be given permission to provide suitable accommodation for themselves. The house they have proposed supports 'intergenerational living'. Unlike adaptations to an existing building which often prove compromise the spaces of the original house our design being more generous is not similarly spatially compromised.

Housing for Older People in Ireland - Time for action, by Alone, 2018, details the the principals of 'Rightsizing', 'Ageing in Place', 'age friendly and universal design principals' and dispersed housing located within existing residential settings. 'Rightsizing' is the ability of older people to move to housing types within their community which fulfil their needs. The 2016 Report on Housing for Older People recognises that 15% of those 65+ would move to a different home in their community. In this instance and where there is no alternative our clients propose building a housing type which is the 'right size' and conforms to universal principals of

accessibility. In certain circumstances the right size must be larger to fully support an active home life for as long as possible. This is the principal of 'age friendly' accommodation. Where future housing is restricted to the current model of 1970's typologies elder populations will not have options.

SDCOCO policy, H3 Objective 4, recognises that a comprehensive study is required for the provision of housing for older people and particularly for areas within the county like Firhouse where populations have higher proportions of older people. The type of housing we propose meets policies which support 'Ageing in Place'. Our proposal should be understood as a house type which on suitable sites supports the provision of the 'spectrum of housing' required to support the needs of an ageing population. We believe that this is a positive precedent for our clients who wish to provide a suitable solution for themselves. Such housing is recognised as supporting 'social connectedness' as a key to wellbeing. (TILDA - The Irish Longitudinal Study on Ageing Briggs et al 2016).

The ESRI research on housing has found that there is little evidence of housing mobility amongst older people. The lack of suitable housing limits the mobility of older people and 'ageing in place'. The problem is rooted in residential patterns, in suburbs like Firhouse, which were developed in favour of mid sized semi detached inaccessible single family units. The diverse needs of current and future citizens in 'sustainable communities' was outlined in 2007 Government Statement on Housing Policy, Delivering Homes, Sustainable Communities.

The size of house we propose, a four bedroom sustainable accessible home, is also supported by SDCOCO policy H8 Objective 7: To facilitate, in limited locations, four and five bed detached homes on lands that are appropriate to low density residential development. The site, a corner site is the ideal location for dispersed housing of this kind within existing suburbs with poor diversity of housing types and sizes. Corner or end of street sites are relatively uncommon and a large proportion of those which exist have already been developed. Vacant corner or end of street sites are relatively uncommon and so the type of house we propose is unlikely to be possible in a large number of locations.

The existing house type and our clients needs.

1. The existing house could be extended to accommodate a downstairs bedroom accessible bathroom and accessible toilet with increased circulations space. This would result in extensions to the side and back of the house which in turn would land-lock some spaces compromising their current functions and access to daylight. It would also have involved structural changes to the house to facilitate the spatial reorganisation of the ground floor. While this option would provide the new desired spaces it would compromise existing spaces and layouts and for that reason would be unsuitable.
2. Having seen how other houses in the area have been extended to the rear, to the rear and side passage, to the front rear and side it was their view following our advice that all of these solutions would be substantially compromised.
3. Our clients had already retrofitted the house installing a heat pump, underfloor heating and insulation upgrades and new windows and doors. Extending the house would undo much a large proportion of this work where the existing house would have to be extended to the side and rear. This was seen as a substantial waste of resources and undoing what is now a very comfortable house which would be recycled into the market without any changes.

**A new house type.**

Our proposal is for a new house type in this area which we believe would add to the spectrum of housing and facilitate 'Ageing in Place' in an area, Firhouse, which has little or not typological variety suitable for either an ageing population or those with disabilities.

The following qualifications in the RFI would progressively erode the design of our proposal so that it conforms to a housing type which is not suitable for our clients needs.

The rationale for our design and its compliance with best practice in relation to universal access, 'Ageing in Place', sustainable low carbon and low energy design and a house of contemporary design are set out below:

- a) At first floor the house shall keep the front building line established by the existing house and other houses in the area.**

We would argue that we have followed the morphology of the area where houses step relative to each other and at the end of streets facing the park houses twist and realign to the park. We accept we have not retained the rear building. Our proposal follows the stepped building line characteristic of Killakee Park and the other streets in the area.

- b) At ground floor level, a forward projecting element may extend up to 1.5 meters beyond the main body of the house, and may step forward of the front building line of Killakee Park.**

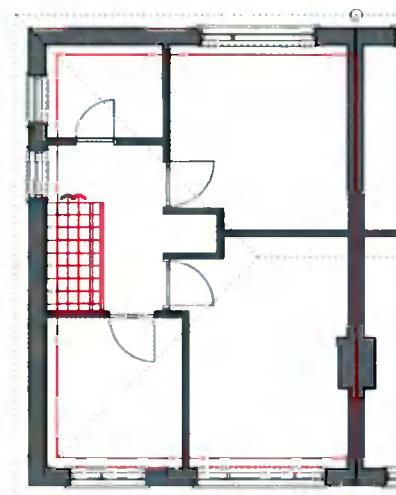
We have propose a simple ordered plan which dose not need to be extended forward of the front building line. Our design intentionally avoids any projecting elements forward of the front building line as these would compromise the integrity of the sustainable design of our proposal.

- c) At First floor level the house shall have a front-to-rear building depth that dose not exceed that of the existing house and other houses ion Killakee Park.**

If we were to follow this advice strictly and insulate the building to achieve best practice the internal area would be reduced by between 360mm and 400mm. This reduction would be a compromise for a plan depth which is already small. Most rooms at this level including bedrooms would be reduced by 200mm at two sides. Our follows the front building line but breaches the rear building line so that the ground and first floor have the same footprint which is square on plan and very efficient having a low volume to surface area. The house steps beyond the rear building line by circa 1100mm which we believe is not a significant step. Being to the immediately north of the existing house it will not have a negative shading effect of the existing house. The form of the house is derived from the circulation patterns required for universal access at ground floor and reducing the costly thermal envelope of the building. The house also occupies a far smaller footprint than an existing house which would comply with the design changes in the RFI.

- d) At ground floor level, a rear projection may extend the front to rear building depth beyond that outlined in (c).**

Our proposed plan and building form has been determined by issues of sustainability and freedom of usage. It follow a simple plan without extensions front and rear resulting in a building without excess which has a small surface area to volume. A reduced external envelope is more sustainable than the mode implied by the



**Fig 1 & 2**  
[above]  
The existing houses at Killakee Park step relative to one-another creating a sawtooth stepped building line. Our proposal conforms to this morphology.

[below]  
Red outline indicates the reduction in floor area relative to the increase in the thickness of the thermal envelope to comply with contemporary standards and future proof a house based on the existing front to back building line.

changes demanded in the RFI. The plan is also informed by the need to provide a wholly accessible ground floor for our client. This 'freedom of usage' lead to a floor area of circa 75sq.m. which is not excessive compared with existing houses which have been extended at ground floor.

Our proposal conforms to the stepped building line at Killakee Park. Each pair of houses steps relative to its neighbour as the street progresses from east to west towards the park. Other streets in this area follow a similar morphology. The final house, at each street, steps and is sometimes twisted relative to its neighbours. We have stepped our proposal in line with this context but also twisted the house so it addresses equally the park and the street in line with the dual frontage requirement at section 11.3.2 (ii) Corner development should provide a dual frontage in order to avoid blank facades and maximise passive surveillance of the public domain.

Our clients are retired and wish to continue to live in the area together with their neighbours. Their current house does not meet their needs which is why this house is being designed. Donal Hickey has a degenerative disease which seriously restricts his movement and is becoming progressively more acute. He will likely be wheelchair bound which requires space to facilitate movement, increased door widths and the integration and connection of spaces with one another. Our design has been generated to respond to these needs which are by no means unique. Houses of this kind will be required should our ageing population wish to live in their community, a policy which is supported by central government policy and the stated policies of South.

The detailed requirements of this section would require a complete redesign of the proposed house to match the existing house type, building lines and footprint from the 1970's. As this runs contrary to our clients requirements for a house suitable for their future needs we cannot follow these requirements as the result would fail to deliver a suitable house.

We have for the reasons above retained the house as proposed without making the changes required by (c) and (d) above. We have set out above compliance with [a] and for reasons of universal design and sustainability will not avail of front facing additions. We would ask the council to judge or proposal on its own merits and grant permission without conditions.

**RFI Item 2.**

*The proposed roof type and profile is acceptable: however, the roof is generally taller than that of the existing houses and the ridge line (measure at the point of connection between the hipped roof and the central lightbox feature) is taller than the existing.*

The county Development Plan does not prevent designs which have ridge or eaves heights which do not exactly match the existing. Ours is a contemporary design which is also supported by the policies of SDCOCO.

We cannot lower the roof height to match the existing without compromising the design of the proposed house. We acknowledged in our application that the ridge height at the central rooflight is intentionally higher than the existing house at No1 Killakee Park. The height of our proposal, being higher than the existing typology from the 1970's, is gauged relative to two houses built in side gardens which face onto the park both of whom are taller than the house/site within they are built. Our proposal is no taller than these two houses both of which are within 600-800mm of the height of the existing houses.

Our roof falls within this range of roof heights within the immediate area. Contemporary construction with dramatically thicker roofs and walls will breach the form of buildings from the late 1970's. We do not believe that any transitional measures would be required in respect of a house whose ridge height is 236mm taller than its immediate neighbour.

We do not propose changing the roof profile or parapet as both are integral to the contemporary design of the building and are the result of minimising the surface area to volume of the house optimising its form in relation to sustainable . The rooflight is not a feature but admits daylight to the centre of the plan a key daylighting strategy. One rooflight provides a second source for five spaces at first floor. The functionality, sustainability and contemporary design are all integral to the proposed design.

We ask the council to judge the proposed on its own merits and grant permission without condition for the design, form and layout of the house.



**Fig 3, 4, & 5**  
[above and middle]  
Two corner houses at the junction of Carriglea Avenue and Ballycullen Avenue both have ridge heights which are higher than the existing houses, both are higher than our proposed ridge heights. Both are three storeys including their attic spaces.  
[below]  
The ridge height of the proposed new house follows the pitch of the existing houses with a ridge height 236mm higher than the existing ridge.

**RFI Item 3**

The Public Realm Department has rejected the proposal to remove the mature SDCC street tree located to the west of the sit. The tree should be retained and the width of the new proposed vehicular entrance reduced in order to minimise the impact on the root protection area (RPA) of the existing tree. The Public Realm Department has also recommended protection measures during construction to prevent damage to this tree. The Roads Department has raised concerns relating to the traffic safety and these need to be addressed prior to a grant of permission.

We have had discussions with the Traffic department so that a safe entrance is provided with suitable sight lines. It is necessary to remove a street tree which we propose will be replaced with a new Lime tree.

(a) The applicant is required to submit the following additional information:

(i) Relocated one or both of the proposed vehicular accesses to as not interfere with the Root Protection Area of the existing tree, Limit the width of each vehicular access point to 3.5m and if possible provide enough separation to allow on street car parking between the accesses.

(ii) If assessment of alternatives under (i) shows there to be no safe alternative to the proposed layout, the applicant will show where a replacement tree would be planted , in the public realm, at the applicant's expense. Assessment under (i) should be demonstrated in this case.

Two options for the entrance locations were provided to the Traffic Department; one which preserves the tree but places the entrance of the new house closer to the junction and another which removes the tree locating the entrance for the new house further from the entrance.

The option which retains the street tree places the entrance within 11.95m of the junction. Option A which removes the tree is 17.61m from the junction and provides a safer entrance with better sight lines. We presented both to traffic and they have accepted that the option which removes the tree is an appropriate and acceptable solution.

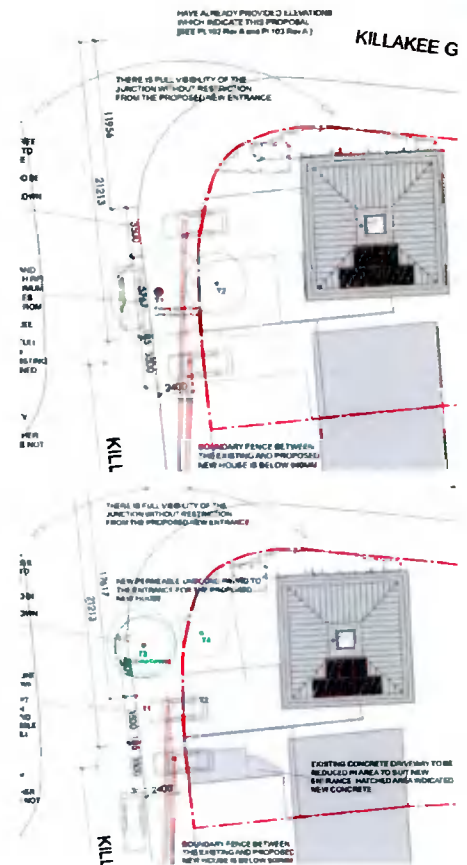
(b) In relation to the proposed layout or alternative layouts assessed, the applicant should show:

(i) accurate plans demonstrating the provision of a visibility splay 2.0m x 45m in both directions from the entrance. Sight lines should be shown to the near side edge of the road to the right hand side of the entrance and to the centreline of the road to the left side of the entrance (when exiting).

(ii) The vehicular access points limited to a width of 3.5 meters for both existing and proposed dwellings at 1 Killakee Park, Dublin 24. Regardless of accessibility provided within the site, the vehicular access boundary should be no more than 3.5 meters in width.

(iii) The footpath and kerb dished and widened to the full width of each proposed driveway.

(iv) site elevations at a scale of no less than 1:200, showing the proposed boundary treatment and relative location of the SDCC Street Tree. The Boundary wall at the vehicle access point shall be limited to a maximum height of 0.9m, and any boundary pillars shall be limited to a maximum height of 1.2m, in order to improve forward visibility of vehicles.



**Fig 6 & 7.**  
 [above]  
 Option B which retains the existing street, Lime, tree moves the entrance closer than necessary to the junction.  
 [below]  
 Option A with proposed location of replacement tree and the safer entrance to the proposed new house approved by traffic.

(v) a revised Site Layout Plan showing the extent of the existing concrete on site.

We provided drawings which show the location of entrances and the relocated tree. "Roads have no issue with moving both access away from the junction. The visibility to the right when exiting from the new development should be free from obstruction up to 900mm in height and is shown ok on the drawing."

Drawing T-011 was submitted for comments together with our original elevations which have no boundary treatment at the proposed front garden and entrances to both houses. It also indicates the extent of the concrete pavement at the existing house. A revised drawing of the boundary treatments are not required as there will be no boundary.

The existing front garden has no boundary wall or fence which we propose will continue for the proposed new house. As shown on our plans and elevations the north facing site boundary towards the park will have a hedge creating an appropriate boundary with the path and fronting onto the park..



Front Garden SCALE 1:100/041



Fig 9 & 10 [above]

The drawings submitted at 1:100 clearly show that there is not boundary treatment proposed at the front west facing boundary.

[below]

Existing front garden has no boundary fence or wall [Google Street View 2nd December 2021].



**RFI Item 4**

- (a) *There are no soil percolation test results, design calculations or dimensions submitted for the proposed soakaway. The applicant is required to submit a report showing site specific soil percolation test results and design calculations for the proposed soakaway in accordance with BRE Digest 365 - Soakaway Design.*
- (b) *The application is required to submit a revised drawing showing plan and cross sectional views, dimensions, and location of proposed soakaway. Any proposed soakaway shall be located fully within the curtilage of the property and shall be:*
- (i) At 5m from any building sewer, road boundary or structure.*
  - (ii) Generally, not within 3m of the boundary of the adjoining property.*
  - (iii) Not in such a position that the ground below foundations is likely to be adversely affected.*
  - (iv) 10m from any sewage treatment percolation area and from any watercourse/floodplain.*
  - (v) Soakaways must include an overflow connection to the surface water drainage network.*

We have indicated the location of the soakaway on the Proposed Site drawing indicating the setback distances from boundaries drains and buildings. As discussed with the planner the detailed design of the and percolation tests will take time to complete and asked if this item could be conditioned which we could deal with later should permission be granted and prior to commencement of works on site.

**Conclusion:**

We trust that when viewed on its own merits our proposal is understood as a contemporary high quality design. It has been designed to be a sustainable accessible dwelling which responds to the particular needs of our clients and the principal of 'Ageing in Place' and universal accessible design. We trust that the planning department will accept the validity of our design and that it falls within the scope of SDCOCO 's development plan and policies and will not require the modifications suggested at RFI Item 1 and 2.

Confirmation from Roads and Traffic that our revised proposal fulfils the principals set out at RFI Item 3 and that the proposed entrance complies with best practice. We note that our drawings submitted for planning had no boundaries walls or fences proposed for the new house and therefore no obstacles. Because the location of the new entrance layouts necessitate the removal of a street tree we propose a suitable location for a replacement. We understand that this proposal is also subject to the particular requirements of the Parks Department, to that end we have proposed a replacement tree and its new location.

We trust that we have shown that the location of a 'soakaway' in the rear garden will be located suitable distances from roads buildings and the like in relation to RFI Item 3 all subject to detailed design.

We ask the council to consider conditioning this item, as the testing and design will take time, expense and would likely delay a decision. The planner considered this a reasonable request which we are happy to supply detailed information following the completion of the planning process and prior to lodging a commencement notice for the proposed works.

