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

25 January 2022

**Additional Information Response by  
Homeland BRH Limited for Reg Ref. SD21A/0175  
for development 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 submit this Additional Information Response for a development proposal at Ballyroan House, Ballyroan Heights, Dublin 16, D16 E8C6, (Reg Ref SD21A/0175) refers. This application seeks revisions to development previously permitted under Reg Ref. SD17A/0064 and ABP Reg. Ref. PL06S.249209. 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.

This response is submitted following a request for Additional Information in relation to 3 items issued on 23 August 2021.

## ENCLOSURES

The enclosures submitted with this application as outlined below:

- 10 copies of this Additional Information Planning Response by Brock McClure.
- 10 copies of Architectural Drawings, Schedules of Accommodation and Architectural Design Statement by LHA Architecture.
- 10 copies of Conservation Report from Robin Mandal Architects.
- 10 copies of response to specific conservation items in the Additional Information Request by Historic Building Consultants.

## **ADDITIONAL INFORMATION REQUEST**

The Additional Information Request and subject applicant response is detailed herein for the convenience of the Planning Authority. We trust that the Planning Authority will examine all material submitted herewith in reviewing the proposal.

We note that this scheme, by way of a response to this Additional Information request, remains fully compliant with the requirements and policy objectives of the South Dublin County Development Plan 2016-2022.

As identified Additional Information (AI) was requested by South Dublin County Council on 23 August 2021. 3 no. items of additional information were requested and a response to each is set out below:

1. **Conservation - The proposed development represents a risk to the integrity and character of the protected structure, by virtue of additional hard landscaping and parking to the front, reconfiguration of the open space in the prominent location in front of Block D, and the addition of steel frame balconies and a larger scale rear extension with a solid appearance. The applicant is requested to revise the proposed development to show how the character and integrity of the protected structure and its setting can be maintained. It appears possible from the plans provided that the prospect of intensifying the proposed residential density of the development is incompatible with the adequate protection of the protected structure and its attendant grounds. As per the Chief Executive Order, it is recommended that proposed alterations to Block D be omitted from any eventual grant of permission. The applicant should consult with SDCC's Architectural Conservation Officer in advance of responding to the request for further information.**

**Response:** We can confirm that the applicant has consulted with Irenie McLoughlin, Architectural Conservation Officer, South Dublin County Council prior to the submission of this response. In addition please find attached 'Architectural Design Statement' prepared by LHA Architecture with accompanying revised drawings to outline the architectural rational and justification for the proposed development and to outline the amendments which has been made in response to Item 1 of the of the AI request.

The attached 'Architectural Design Statement' by LHA Architecture, has addressed the following in their response;

- a) Visual impact and landscape setting of Ballyroan House
- b) Interventions and incompatibility of subdivision with the protection of the protected structure
- c) Additions to rear – extension and balcony

It is respectfully submitted that the design amendments proposed together with the responses provided herein to Item 1 of the Additional Information request satisfactorily demonstrate the design rational and justification for the proposed revisions to the permitted development.

In addition, we can confirm as per the attached correspondences with Irenie McLoughlin, she has noted and also confirmed the following:

- That the attached response to the RFI has addressed the concerns with regard to the visual impacts and landscape setting of the Protected Structure with regard to parking elements and landscaping by providing a more acceptable setting and open area to retain the visual character and link to the front site.

- She also recommended that a Schedule of Works and Method Statement should be completed by a suitably qualified conservation architect and should also be submitted as part of the RFI. In response to this, please also find attached 'conservation Report on proposed works to Ballyroan House prepared by Robin Mandal, Grade I Conservation Architect. It is noted that the present application is for revisions to the permission already granted under reference SD17A/0064. A full method statement, prepared by Robin Mandal, was submitted with that application and as that will be the parent application it will be necessary to adhere to the methodologies set down in that document. For sake of clarity a copy of the methodology section of that report is submitted with this further information. The method statement will still stand.
- Ms. McLoughlin also noted that in the response submitted that the overall design of the balconies has been revised to allow a more visual aesthetic design and a design which will allow added architectural interest in contrast to the existing rear elevation. I do feel that the revised design is much improved, but I still have reservations about allowing the number of opes required and interventions and direct impact to the original built fabric. The addition of the balconies requires consideration in that if these are deemed appropriate for a Protected Structure. This will need rationale and justification along with a method statement and specifications/profile for designs and further detail on material, however their insertion and interventions required is the main issue that needs to be addressed. In response, this item has been addressed in both the Architectural Design Statement attached and the supplementary response from Rob Goodbody, Historic Building Consultant. The design of the steel balconies has been revised to significantly reduce their width and the degree to which they project to the rear of the house, such that a lesser proportion of the rear elevation is affected, and the balconies will be less dominant on the elevation.

Access to the proposed balconies is either provided through existing doorways in the protected structure or via three window opes which will be extended to floor level to create door openings minimising the impacts on the original fabric of the protected structure. The conservation methods set out in the original conservation report for extending opes and removing fabric remain applicable to the currently proposed revisions.

- She also stated that she had concerns about the addition of the new block and shared the comments already included in the RFI in relation to the block form of the new addition. She stated that, likewise the addition should be a light addition to the rear of the Protected Structure and the work required and interventions in allowing the new addition to adjoin and connect to the existing rear elevation should be included in the Further Information submission. The revisions proposed to the addition, providing a finish with blackened vertical timber cladding to tie in with the balconies improves the overall visual impact.

The revisions proposed to the permitted rear addition reduces its height with the amended design now set back from the plan of the existing rear return. Window sizes have been increased to reduce perceived visual massing and proposed material change to vertical charred timber cladding serves to compliment the addition with the verticality and materiality of the proposed balcony structures.

Overall the proposed additions are integral to the success and viability of the revised approach to the adaptive reuse of the protected structure and together they combine to provide a

balance to the composition of the rear elevation by reinforcing the verticality of the original elevational whilst also being clearly legible as modern interventions.

Please refer to drawing B04\_Rear Elevation which accompanies this submission for more detail.

- Finally, she recommended that a design rationale and visual impact statement should be provided with regard to the proposed balconies and rear addition and the works required, which will impact on the original built fabric and all interventions should be clearly detailed and included in a Method Statement, dealing all proposed works to the Protected Structure. This should include fire safety upgrades, upgrades of services to accommodate the proposed apartments and thermal efficiency upgrades which we would like to see included with regard to climate change adaptation and adaptative reuse. As noted above, please refer to the previously submitted method statement prepared by a Grade I Conservation Architect, Robin Mandell which fully address these issues.

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.

2. **Sustainable Drainage System** – There is a lack of SuDS (Sustainable Drainage System) shown for the proposed development. Natural SUDS features should be incorporated into the proposed drainage system. The SUDS should be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. The applicant shall show further proposed SuDS features for the development such as Green roofs, grass areas, tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS.

**Response:** As this application seeks revisions to the permission previously permitted under SD17A/0064, we can confirm that the revisions proposed have no impact on drainage of the permitted development. In order to comply with best practice principles for storm water design, the Greater Dublin Strategic Drainage Study (GDSDS) recommendations were adopted in the design purposes of the permitted application to ensure that the storm water drainage proposals for the development comply with national and regional guidelines. In order to comply with the GDSDS requirements, any proposed development must ensure that a comprehensive sustainable urban drainage system, SuDS, is incorporated into the development

We can confirm as part of the permitted application SD17A/0064 the following systems are proposed and permitted to comply with the protocol:

- **Attenuation Storage** will be provided to ensure that there is adequate attenuation storage for limited discharge surface water volumes. The permitted proposal details that the attenuation storage will take to the form of underground Stormtech modular storage system for events up to, and including, the 1.0% AEP rainfall event.
- **Permeable Paving** will be provided beneath all car parking areas which will act as the first level of treatment from runoff from parked vehicles. Permeable paving is also proposed at the shared surface area at the south east of the site. In curtilage parking spaces will be constructed as Load Class 2 permeable paving and all other permeable paving proposed will be constructed as Load Class 4.

- **Limiting discharges** to ensure that discharge rates are maintained at a specified greenfield runoff rate. A discharge rate of 6.0 l/s was determined for the site.
- A **class 1 by-pass separator** will be provided as the first second level for the entirety of the site catchment.

The Greater Dublin Strategic Drainage Study (GSDSDS) recommendations have been adopted as a best practice guide design standards for the scheme and will thus be required to be implemented and incorporated into the surface water drainage design solution for the development site. The proposed surface water design complies with the specific requirements of the GSDSDS. The proposed surface water discharge is to the existing surface water sewer on Ballyroan Heights to the immediate north of the site, via an attenuated outflow. The relevant SUDS measures which have previously been permitted under Reg Ref SD17A/0064, have been incorporated into the surface water drainage solution design for the entire development site, drainage will not be impacted as per the proposed revisions address in this application.

3. **Play Provision** – The applicant is requested to provide clarity as to the total number and location of play opportunities; the age range they are appropriate for and whether they are universally accessible. An emphasis should be on active, accessible play throughout the development. The applicant is requested to provide fully detailed play proposals as part of the landscape scheme for the proposed development. The applicant should consider the provision of additional universally accessible equipment within the play proposals for the development. Additional details, specifications and images need to be provided in relation to the proposed playgrounds and play spaces for the development. All play equipment should be of predominantly natural materials with unstructured play included in the proposed design.

The applicant should consider the use of engineered woodchip as playground surfacing material.

**Response:** Again, as per item 2 above, this application seeks revisions to the permission previously permitted under SD17A/0064 only, the permitted landscaping design is not impacted by the proposed revisions. We would like noted that there is no proposal to amend the landscape design as permitted. Prior to submitting the parent application a number of detailed pre-planning discussion took place with the Planning Authority. The applicant has taken every step possible to ensure that all key concerns of the Planning Authority were addressed. One of the concerns was that 'there should be natural plat areas of some form within the open spaces area and consideration given to natural mounding, hide and seek type areas, and a natural water feature.

As per the permitted landscape design, the main open spaces will be landscaped with appropriate planting and natural play areas created by mounding. There is appropriate hedging, seating and a selected water feature to create a high calibre courtyard style setting. The landscape design proposed to the section of open space to the north is informal, with grass mounding and ornamental planting. Informal stone and grass steps create a country feeling here.

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 proposed in the revisions to the parent application. 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.

## CONCLUDING COMMENT


The applicant has made every attempt to address all items raised as part of the Additional Information request and we trust that the Planning Authority will duly consider this submission in full in their assessment of the revised scheme.

It is our considered planning opinion that the proposal now submitted addresses all concerns raised by the Planning Authority and we are of the view that any potential issues that may arise following consideration of this submission can be appropriately addressed by condition.

All considered, we trust that the Planning Authority will look favourably on the proposed development and grant permission for the proposal as appropriate.

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,



**Suzanne McClure**

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