

## **Planning Report**

**Proposed Development at  
Silveracre Bungalow, No. 6  
Whitechurch Road and 5no.  
Derelict Cottages all at  
Whitechurch Road,  
Rathfarnham  
Dublin 14  
D14 W2K8**

**On behalf of  
Dungrey Limited**

**February 2022**



Planning & Development Consultants

63 York Road,

Dun Laoghaire,

Co. Dublin

[www.brockmcclure.ie](http://www.brockmcclure.ie)

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## 1 INTRODUCTION

Our Client, **Dungrey Limited** has instructed Brock McClure Planning and Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, to lodge this planning application for development at a site of approx. 0.58ha located on a site including No. 6 Whitechurch Road, 5no. derelict bungalows at Whitechurch Road and **Silveracre Bungalow, Whitechurch Road, Rathfarnham, Dublin 14, D14 W2K8**.

The proposed development will provide for 22no. 4-bed, 3-4-storey townhouses with private roof terraces at 4<sup>th</sup> floor level. The enclosed material from BBA Architects sets out the design approach to the site.

This application report is intended to:

- Specify the design rationale behind the subject proposal;
- Identify compliance with relevant statutory documentation; and
- Provide a detailed description of the proposal for the benefit of the Planning Authority

## 2 DESIGN TEAM

The Applicant, **Dungrey Limited** has appointed an experienced design team to prepare a residential planning application for submission to South Dublin County Council. The immediate design team comprises:

- **Dungrey Limited** - Applicant
- **BBA Architects**
- **Brock McClure** - Planning & Development Consultants
- **Irish Archaeological Consultancy Ltd (IAC)** – Archaeologist
- **TASK LED** – Civil Lighting
- **Transport Insights** – Transport Planning Consultants
- **Technical Solutions Ltd** – Civil Engineering Surveyors
- **Park Hood Chartered Landscape Architects** - Landscape Architects
- **David Slattery** – Architect – Historic Buildings Consultant
- **Arbeco Limited** – Arborists
- **3D Design Bureau** – CGI/Photomontages

## 3 CURRENT NATIONAL POLICY MANDATE

This planning application has been prepared in the context of recent updates to national planning policy. We trust that the Planning Authority will have regard to these policy and guidance documents in assessment of this proposal and specifically the policy mandate set out in ‘*Housing for All – A New Housing Plan for Ireland*’, ‘*Project Ireland 2040: National Planning Framework*’, the ‘*Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020)*’ and ‘*Urban Development and Building Heights: Guidelines for Planning Authorities (2018)*’.

These documents are key national policy and guidance documents that seek the expedient delivery of quality residential development of an appropriate height and density at suitable infill locations.

We note specifically that the subject site has the potential to deliver 22 units on zoned, serviced land at a highly accessible location approx. 10 min walk to the nearest stop for the Dublin Bus Route 61 or 15b Service that connects to the City Centre, Santry and Dublin Airport (every 10 to 15 min). Routes 75/75A and 17/17D serve stops on Grange Road to the north of the site and provide orbital service connections to Tallaght, Dundrum, Dun Laoghaire, Sandyford/Stillorgan, Rialto, Blackrock and UCD. The proposed Bus Connects programme will introduce Spine / Branch Routes A2 and A4 (high frequency services)

along Grange Road, which will have stops within an approx. 10-minute walk of the site. Bus corridor 12 will be located c.550m to the north of the site and will connect Rathfarnham to Dublin City Centre via Terenure and Rathmines. The overall bus connectivity in the area will result in more attractive travel times in addition to improved journey time reliability.

## **4 SITE CONTEXT**

### **4.1 Subject Site**

The site the subject of this planning application is approx. 5,801 sqm or 0.58 ha in size and consists of a largely green field site with a single storey detached dwelling and ancillary structures. There are semi-demolished structures (5no. derelict cottages) along the front boundary of the site, fronting onto Whitechurch Road and the site includes the Silveracre Bungalow and No. 6 Whitechurch Road.

The site is located c. 550 m to the south of the proposed Bus Connects Core Bus Corridor 12, which will tie in with existing bus infrastructure and connect Rathfarnham to Dublin City Centre via Terenure and Rathmines

The site adjoins residential and industrial buildings on the northern boundary. Also partly adjoining the northern boundary are Loreto High School lands. On the eastern boundary the site adjoins a strip of open space that runs along the length of this boundary. On the other side of this strip is residential development and open space. The site's southern boundary is shared with residential development. The western boundary of the site is a roadside boundary fronting Whitechurch Road.



*Figure 1 – Aerial Map showing approx. subject site outlined in red [Source: Google Maps; shapes added by Author via Adobe Illustrator]*

### **4.2 Existing Dwellings on Site**

The subject site has four types of structures, a bungalow (Silveracre), a cottage in poor repair (No. 6 Whitechurch Road), five terraced ruined cottages and remnants of boundary walls. None are considered to be of architectural significance. The terrace of cottages would have had a significance associated with the mill and its semi-rural setting; however, the loss of the Mill and the ruined state of the cottages leaves only a fragment of the original fabric. The front façade of the cottages acts simply as an infilled

boundary wall. The later Mill House is separated from the cottages and orientated to the south with a gable to the road, has a fragmented relationship with them.

The rear of the cottages cannot be considered to be of any particular significance, they have been altered from their original form, with 20<sup>th</sup> Century extensions etc. that are similarly in a ruined state. The rear setting too has completely changed with the streams redirected/ filled in, leaving an open field area beyond the ruined walls.

The bungalow is free-standing within the site, the mill building has been demolished and replaced by two 20<sup>th</sup> Century houses. The later mill house is separated from the site by the houses referred to and has a further late 20<sup>th</sup> Century house constructed on its eastern gable side. The singular stand-alone cottage had a group significance with the original 19<sup>th</sup> Century grouping, now lost.

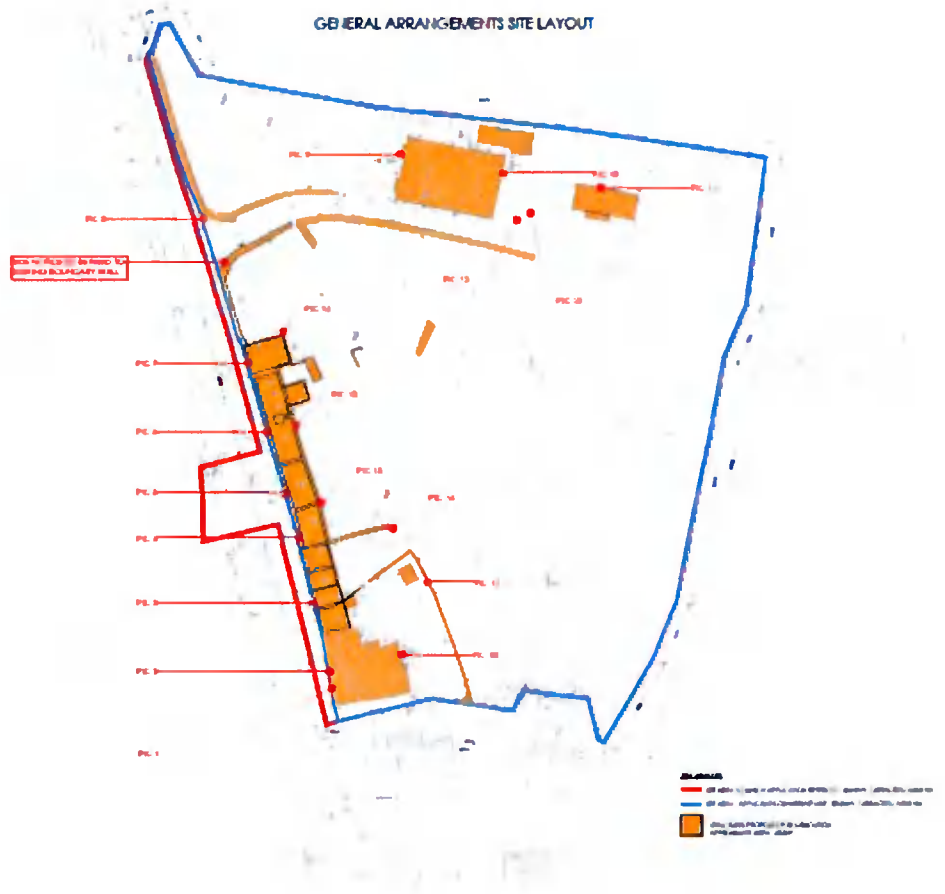


Figure 2: Structures proposed for Demolition

#### 4.3 Site Context

The site is an approx. 6-minute walk (approx. 500 m) to the nearest high frequency bus service. This is the Dublin Bus Route 16 Service to Dublin Airport that serves Dublin City Centre, which arrives at a frequency of every 10 to 15 minutes. The site is also an approx. 10 min walk to the nearest stop for the Dublin Bus Route 15b Service for Ringsend Road (every 10 to 15 min). The proposed Bus Connects programme will introduce Spine / Branch Routes A2 and A4 (high frequency services) along Grange Road, which will have stops within an approx. 10-minute walk of the site.

## 5 PLANNING HISTORY

The planning history associated with the subject site and surrounding context is an important consideration in the assessment of any particular site and is outlined below.

### 5.1 Subject Site

There is a limited recent planning history for the site, which is outlined as follows.

#### Reg. Ref. 86A/767T

Planning permission applied for mobile home site in 1986. There are no online files for this application. If there are any files available these would need to be requested from South Dublin County Council (SDCC) archives.

#### Reg. Ref. SD12B/0315

Planning permission was applied for on the 19<sup>th</sup> of December 2012 for a new 215mm thick boundary wall to the rear to run along the entire eastern boundary of the property, 91m long and with an average height of 2.49m with a maximum height of 2.97m. The Council noted the wall was to be constructed along the west bank of the Castle stream watercourse which forms the eastern boundary of the site. It was also identified that the site might be subject to flood risk.

Additional information was sought regarding more detail on the adjacent stream in relation to the proposed wall, a flood risk assessment, boundary treatment including details on height, materials, colour and landscaping on the eastern elevation.

The applicant submitted additional information advising that there was no existing watercourse adjoining the site nor was there any danger of flooding. It was also advised that the suggested landscaping outside the wall was not in the applicant's remit as this land was owned by Council not the applicant.

The applicant's response was considered acceptable to Council and permission was granted. No appeals were received so a final grant was issued on the 29<sup>th</sup> of July 2013. The grant of permission included a condition to retain the existing hedgerows and trees onsite. This permission appears to have been implemented (wall has been constructed).

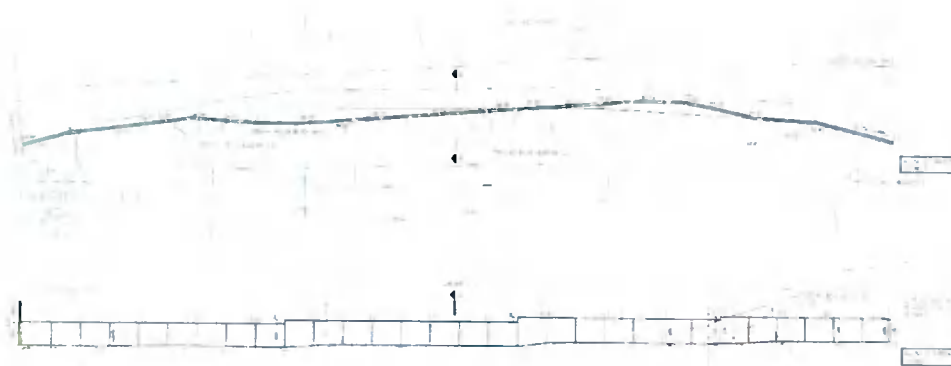


Figure 3 – Proposed Plan and Elevation [Source: SDCC's online planning enquiry system]

### 5.2 Surrounding Area

The recent planning history of adjoining sites was reviewed, and the relevant permissions are outlined below.

#### Reg. Ref. SD18A/0408 – 8 Whitechurch Road

Planning permission applied for in 2018 for the change of use of existing shop to residential use with construction of bedroom extension over existing shop together with dormer window at side and new entrance door, boundary fence and gate at front. Additional information was sought including clarity from the applicant regarding the nature of use for the entrance to the north of the site and the request to redesign the window facing the neighbouring Protected Structure to avoid overlooking. Additional

information was received, and permission subsequently granted. With no appeals a final grant was issued on 25th of March 2019.

**Reg. Ref. S01A/0151 – Rear of 8 Whitechurch Road**

Planning permission applied for in 2001 for the construction of a 2-storey detached house at rear with access onto Tara Hill. Additional information was sought in relation to details on the piped stream through the site, means of reducing overlooking, boundary treatment and development on adjoining sites. Additional information was received, and permission subsequently granted. With no appeals a final grant was issued 17th of December 2001.

**Reg. Ref. SD07A/0958 & ABP Ref. PL06S.228107 – The Mill House**

Planning permission applied for in 2007 for the construction of 3 no. houses and conservation works to The Mill House (Protected Structure). The houses would be accessed through a private courtyard via Whitestown Road and will be 2.5 storeys high on the Whitechurch Roadside and 1.5 storeys high on the St. Patrick's Cottages side with balconies at first and second floor level to Whitechurch Road.

We note this application was submitted prior to the lands being designated an Architectural Conservation Area. SDCC refused permission for the following reasons: *it would not be possible to provide adequate vision splays as this would involve the removal of the boundary wall which would have a significant unacceptable impact on the character of the Protected Structure; the felling of existing trees is not consistent with the specific objective to protect these; and inadequate private open space.*

The applicant appealed the decision to An Bord Pleanala who also refused permission on the 10th of October 2008. Similar reasons to the Councils were given, with the additional reason of inadequate car parking provision.

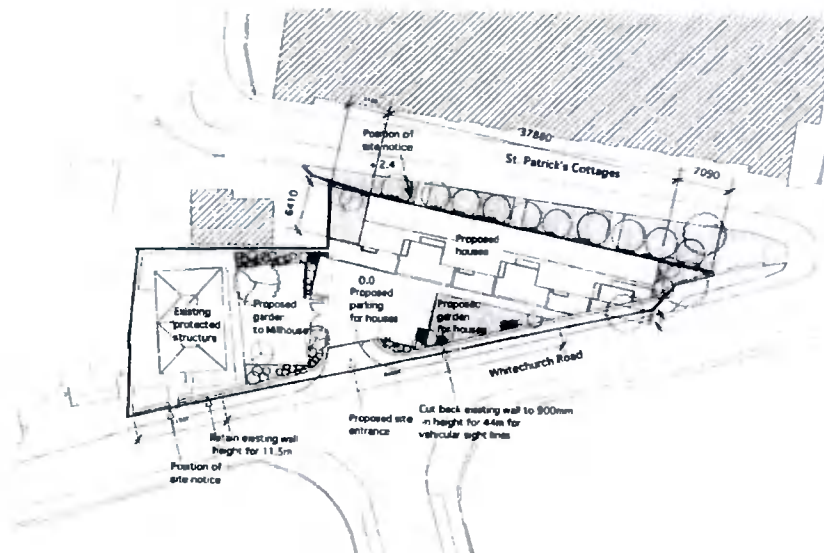


Figure 4 – Proposed Site Plan [Source: SDCC's online planning enquiry system]

**5.3 Planning History Summary**

There is limited planning history for the site, however, the most recent permission for a boundary wall indicates that treatment of the eastern boundary requires careful consideration, which has been included in the subject proposal. The visual impact on the existing residential development at this boundary was a key consideration of the Planning Authority. The Council also raised concerns regarding a historic watercourse adjacent to the site and risk of flooding.

The relevant planning history of the surrounding sites illustrates that new development must consider any potential impact on the Protected Structure the Mill House. We note that the subject site, however, is not directly adjoining these lands.







### 6.3 Protected Structure

There is one Protected Structure close to the site, the 'Mill House' referred to in the cartographic analysis below. This house was built immediately south of a Mill building (now demolished) that bordered the southern boundary of the subject site. The following details are recorded on the NIAH: South Dublin RPS Ref: 258



Figure 7 - The "Mill House"

#### Description

Detached four-bay three-storey house, c.1810. Rendered walls. Doorway to side in later conservatory. Timber sash windows. Replacement hipped slate roof with pierced terracotta ridge tiles and large brick chimney stacks to south. Rubble boundary wall to street.

The associated mill was demolished in the mid twentieth century and the roadside cottages associated with the mill are separated from the house, only one remains and is in poor condition. No vestiges of the mill streams or associated mill infrastructure remain save some fragments of boundary walling. The cottages are not referred to by the NIAH.

### 6.4 Residential Mix

The extent of residential development proposed comprises 22 no. residential units in the form of 4-Bed 4 Storey (7P) Terrace Units with a proposed gross floor area ranging from 197 – 214 sq.m.

7 no. main house types are proposed with different gable elevation treatments, which vary depending on their orientation and proximity to a public space or public roads, where dual frontage is required.

The residential mix is as per the following:

- House Type A - 4 storey, 4-bedroom end of terrace dwellings - 2 units
- House Type A1 - 4 storey, 4-bedroom mid terrace dwellings - 2 units
- House Type B - 4 storey, 4-bedroom semi-detached dwellings - 6 units
- House Type C - 4 storey, 4-bedroom semi-detached dwellings - 2 units
- House Type D - 4 storey, 4-bedroom end of terrace dwellings - 2 units
- House Type D1 - 4 storey, 4-bedroom mid dwellings - 6 units
- House Type E - 4 storey, 4-bedroom semi-detached dwellings - 2 units

All units are afforded with a garden in the form of private open space.

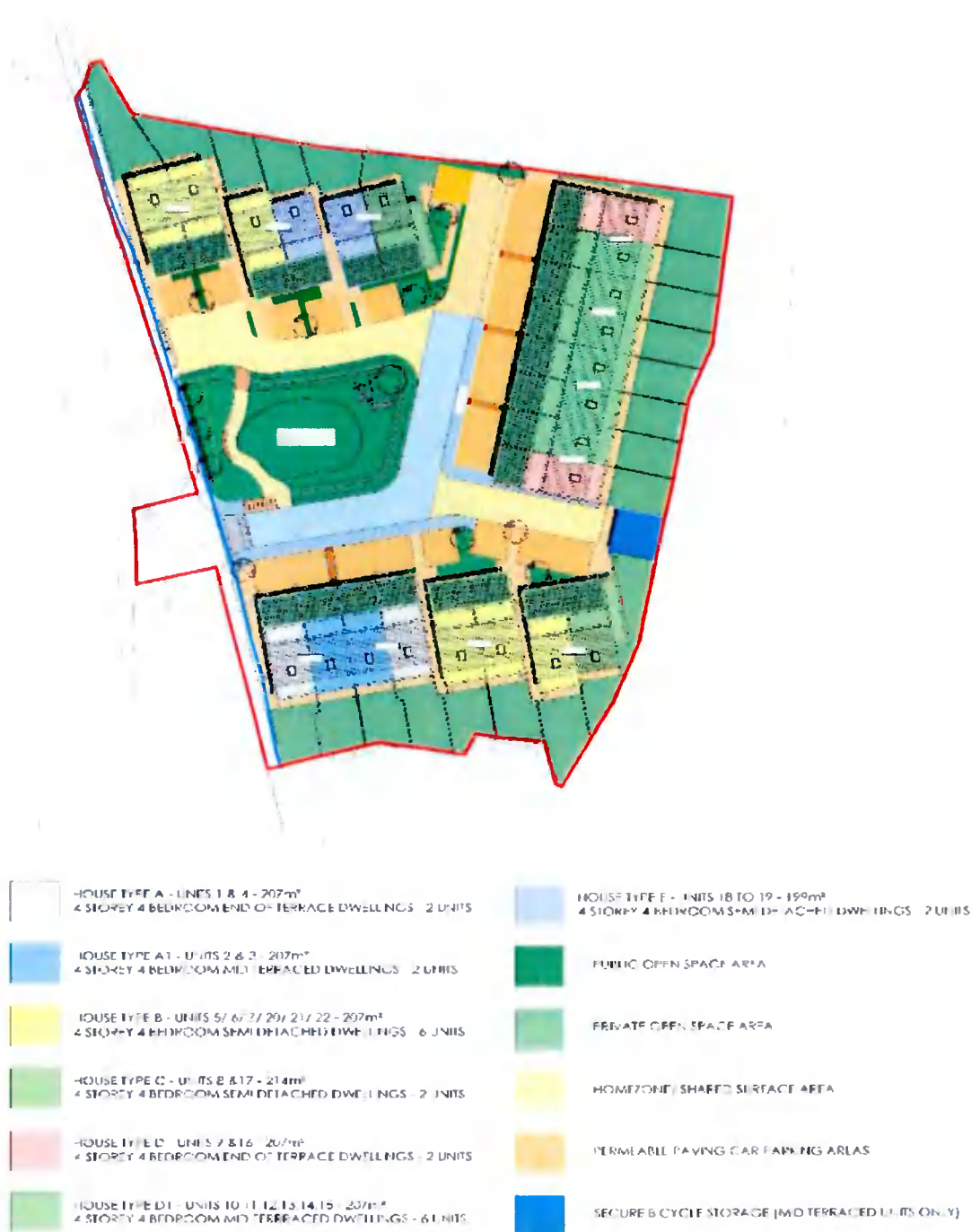


Figure 8: D-122-PL-SL-102 – Proposed Site Layout legend - Drawing produced by bba architecture

## 6.5 Building Heights

The proposed development comprises of 22no. units of 3-4 storeys height. All units are designed similar in size and height to promote coherent, unified, high quality residential development. The proposed height of the units is 3 storeys with a setback fourth floor.

We submit that the proposed building height is acceptable and is not excessive given its separation from existing residential properties. The site is also in close proximity to public transport and amenities which supports compact, intense forms of infill development. The site is an approx. 6-minute walk (approx. 500 m) to the nearest high frequency bus service. This is the Dublin Bus Route 16 Service to Dublin Airport, which arrives at a frequency of every 10 to 15 minutes.

The site is also an approximate 10 min walk to the nearest stop for the Dublin Bus Route 15b Service for Ringsend Road (every 10 to 15 min). The proposed Bus Connects programme will introduce Spine / Branch Routes A2 and A4 (high frequency services) along Grange Road, which will have stops within an approx. 10-minute walk of the site

As can be seen from the photomontages below between the existing and proposed development on site, the design has been brought forward to ensure that the various elements of the scheme protect the existing residential amenity of the surrounding area.

The size of the site and the proximity to public transport does facilitate the current proposal for proposal of 3-4 storeys in height. This approach is supported by the current national policy mandate and by the fact that the proposal is protecting established levels of amenity.

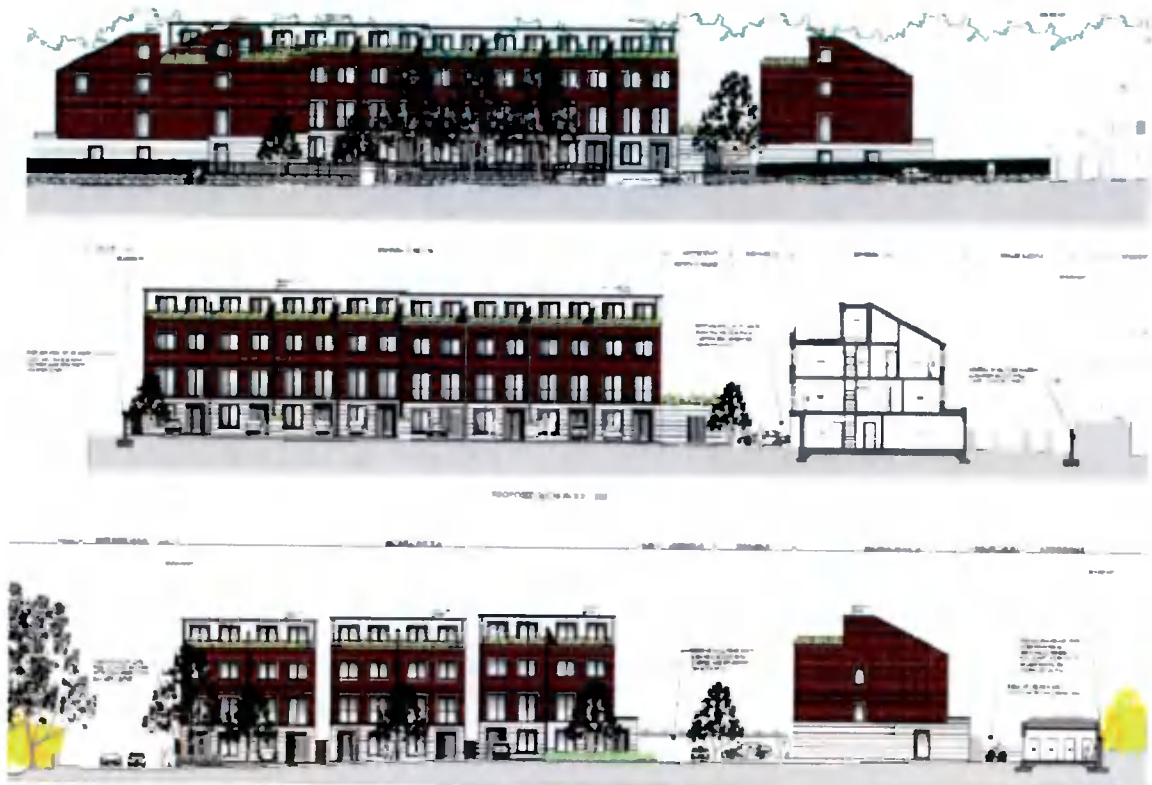


Figure 8: Proposed Cross Section of the development in relation to adjoining properties



Figure 9: Existing View



Figure 10: Proposed View



**6.6. Residential Density**

A residential density of 37.8 units per ha is proposed at this site. This is based on a proposal for 22 units on a site of 0.58 ha. This is appropriate with respect to current national policy, taking into account the topography and the surroundings of the site and previously granted planning permission in the area.

**6.9 Car Parking**

The proposal provides for 44 no. car spaces. This provision equates to a ratio of 2.0 for this site given that 22 no. units are proposed. All houses are provided with 2no. off street parking spaces to the front of each unit or in its close proximity.

These areas have been designed with integrated approaches incorporating elements of urban design and landscaping in order to soften hard standing surface parking areas to avoid a monotonous parking format throughout the site and make sure that it does not dominate the scheme.

This level of parking is considered exceptional given the location of the site, which is located ca. 550 m to the south of the proposed Bus Connects Core Bus Corridor 12, which will tie in with existing bus infrastructure and connect Rathfarnham to Dublin City Centre via Terenure and Rathmines.

Dwelling Type	No. of Bedrooms	Zone 1 Rate	No. of Houses	Max. Car Parking Spaces
House	3+ bedrooms	2 spaces	22	44

**6.8 Bicycle Parking**

Each of the proposed houses are proposed to include a rear garden and, as such, bicycle parking within the development will be fully accommodated within the curtailment of each residential unit. In order to accommodate cycle parking for residents of the mid-terrace houses who do not wish to bring bicycles through their residences, a secure bicycle parking store is also provided within the site which will have a capacity of 4 no. cycle parking spaces per terraced house, equating to a provision of 32 no. spaces in total. 12 no. short-term visitor cycle parking spaces have also been provided in the vicinity of the site access junction in the form of 6 no. Sheffield stands.

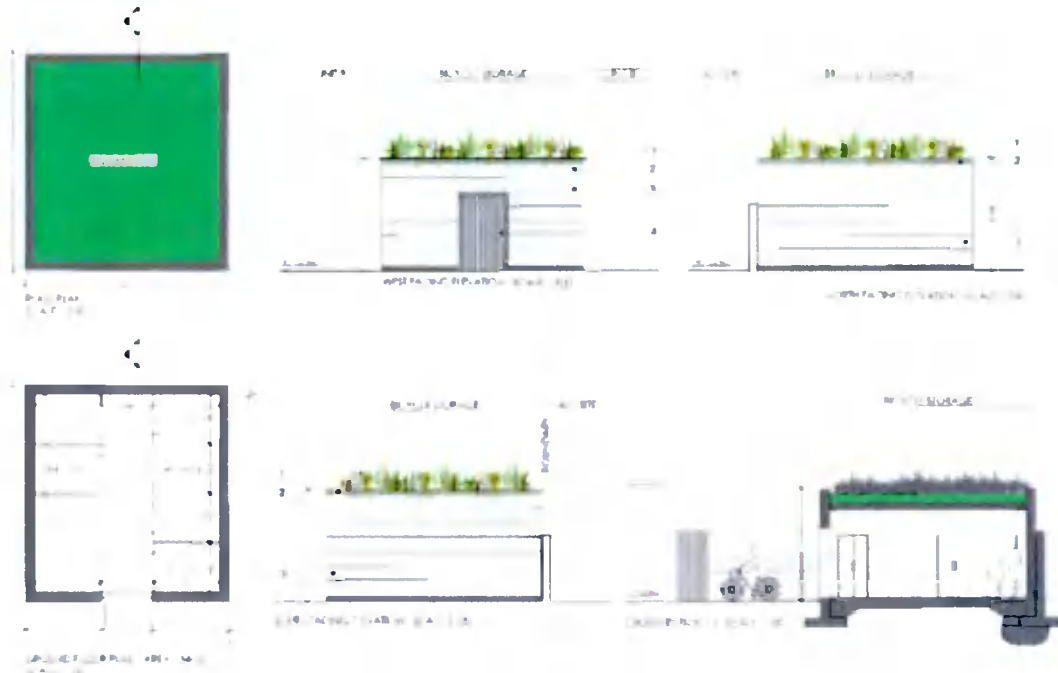


Figure 11: Communal bicycle parking building – produced by BBA Architecture



Figure 12: Example of sedum roof over communal bicycle parking building

## 6.9 Refuse Storage and Collection

Secure bin storage is provided at the front curtilage of the dwelling for all terraced units. These are divided in 3 different structures in separate locations to ensure their proximity to the residential units.

Storage for the houses will be provided within the individual sites.

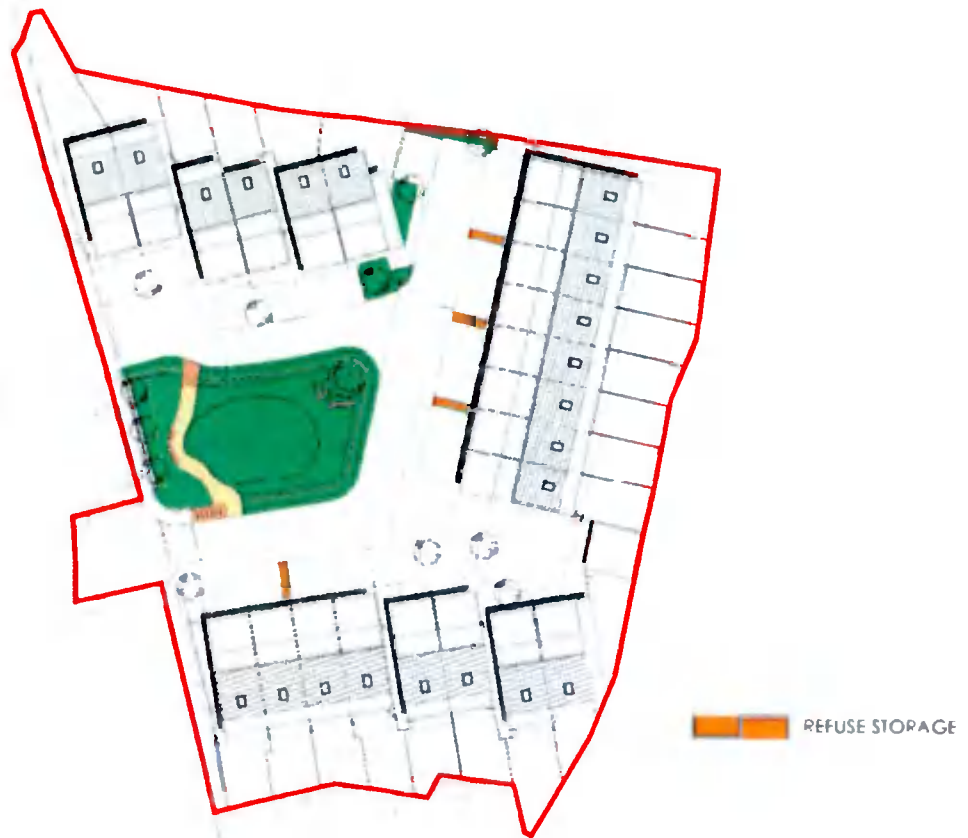


Figure 13: Refuse Storage layout – Produced by BBA Architects



Figure 14: Typical refuse storage units to the front of terrace dwellings – Source – Metrostor



## 6.10 Open Space

### Private Open Space

All residential units are provided with a private open space in the form of a private garden area, ranging in size from 69.3 – 133.5 sq.m.

Rear gardens separated from each other by 1.8m high concrete post and timber panel fences and from existing adjoining properties with 2.0m high concrete block walls capped and rendered on both sides.

Planting will be provided between the parking spaces, footpaths and houses to create an identifying space between the public road and the built edge.

### Public Open Space

Public open spaces with pedestrian routes/seating areas and natural play elements which integrate the proposed structures into the existing built landscape, linking the proposal with the adjoining developments. The public open space is located in the centre of the site in order to be accessible and supervised by as many units as possible.

Well landscaped public open spaces are all connected and accessible by pedestrians. A total open space provision of 580 sq. m is proposed, which equates to approximately 10% of the total site area. As set out in the enclosed landscape masterplan.

We can confirm that all open spaces comply with Development Plan standards.



Figure 15 – Landscape Masterplan

### 6.10 Part V Provision

A Part V proposal for 2no. 4-Bed 4 Storey (7p) Semi Detached Units accompanies this planning application. Detailed costings and a drawing detail are enclosed to meet requirements for the validation of this application. The location of the two social housing units is illustrated in the graphic provided below.



Figure 16 – Proposed Part V units at the front of the site

### 6.11 Childcare Provision

A total of 22 residential units are proposed at this site and a requirement for childcare is not considered relevant in the context of the nature of this proposed development.

## 7 Pre-Planning Meeting with Local Authority

A Pre-Planning meeting was held with the Applicant and South Dublin County Council on 4<sup>th</sup> June 2021.

Meeting notes, taken by SDCC at the time of the meeting, are appended to this report along with those prepared by the Design Team.

The matters raised in the pre-planning meeting are addressed in the reports provided with this application. Inputs from consultants such as a Construction Management Plan, Demolition and Waste Management Plan and Mobility Management Plan which can all be conditioned with and provided once the Final Grant of Permission is received.

### Planning

- Site is former Caravan Park
- Subject to RES Zoning objective
- Width – Southern Boundary, on the narrow side, dwellings only 5.5m
- Provide detail on Greystones Development
- Rear elevation – have regard to overlooking, clarify separation distances
- House option – preference for this option over mix of apartment option, less surface parking, better surveillance
- Concerns with incremental approach of houses and apartments
- Rear gardens seem to be tight, particularly NW and SE corners of site, some tweaking likely to be required
- Cud De Sacs – only one turning head
- House option – southern part of site, two pairs of semi's sharing rear garden access, could improve by providing rear garden access
- Offsetting private amenity space – have regard to exempted development, setbacks of development in adjoining sites
- Encouraged to look at side elevations and how they would work as design progress, provide interest, surveillance, particularly any units that face the main road
- Provide photomontages, range of views
- Close to stream
- Japanese Knotweed in the area
- Clarify what is proposed to wall in north and east boundary
- Old mill race – heritage-may wish to contact Heritage Office and Architectural conservation Offices
- Provide details of setback from mill race
- Landscaping scheme would be required
- Part V

### Roads

- Turning heads 8 and 16, tweak to make work, swept path analysis
- Emergency Vehicle Access
- Main access – visibility splays, sightlines, TII Standards
- 2m wide footpaths along site frontage and minimum of 1.8m internally
- Car Parking – Table 11.24 of CDP (10% electric, 5% mobility impaired)
- Bicycle parking – provide middle ground between SDCC and Apartment guidelines if apartment option, refer to table 11.24 of CDP.
- Bin storage and management, show location and access
- Traffic and Transport Assessment – how could access point be joined to this
- Cycle Track on main road – how could access point be joined to this?
- Construction Traffic Management Plan and Construction Demolition Waste Management Plan required
- Mobility Management Plan required
- Lighting report

- Taken in charge drawings
- Road opening license

#### **Water Services**

- Maps of Services can be requested
- Surface Water – full infiltration or discharge wo Whitechurch Stream, Clarify
- Flood Alleviation Scheme
- Attenuation – SuDS, use as much natural as possible, tree pits, porous paving, swales, detention basins, green roofs
- Flood Risk Assessment – OPW Guidelines
- Foul and Water – Mains on road, pre connection enquiry with Irish Water, Confirmation of Feasibility, advised to contact ASAP, preference to have letter with application
- Whitechurch Stream, crossing sewers and watermains, vertical separation distances required, minimum depth of cover.

#### **Pre-Planning Conclusion**

All pre-panning feedback has been taken into consideration where possible with the final design proposal now put forward including the design of side elevations to include passive surveillance and interest in the design, details on heritage associated with the subject site and surrounds, refined details of turning areas within the site and clarification of various details within the site such as access and bin storage. The subject proposal has taken particular regard for overlooking through the provision of appropriate setbacks, turning areas within the layout of the scheme and provision of adequate open space for residents.

## 8 South Dublin County Development Plan 2016-2022

The South Dublin County Development Plan 2016-2022 is the relevant statutory planning context for the subject site. The provisions of the Plan as they relate to the subject site are detailed herein.

### 8.1 Zoning

Under the South Dublin County Development Plan 2016-2022 (County Development Plan) the site is zoned Objective RES which has the objective “To protect and/or improve residential amenity”.



Figure 16 – Zoning Map showing approx. subject site outlined in red [Source: SDCC Development Plan Map; shapes added by Author via Adobe Illustrator]

Uses Permitted in Principle under the Objective RES zoning include:

“Housing for Older People, Nursing Home, Open Space, Public Services, **Residential**, Residential Institution, Retirement Home, Shop-Local, Traveller Accommodation.”

Residential development as is currently proposed is therefore appropriate to this site.

### 8.2 Heritage and Conservation

The site adjoins the **Saint Patrick's Cottages, Grange Road, Rathfarnham Architectural Conservation Area (ACA)** on its eastern and southern boundaries (black dashed line on above figure). There is also the **Record of Protected Structure The Mill House** (Ref. 258) located to the south of the site (not adjoining).

Under the County Development Plan, it is Council policy to “preserve and enhance the historic character and visual setting of Architectural Conservation Areas and to carefully consider any proposals for development that would affect the special value of such areas.” Any new development adjacent to an ACA must ensure it “preserves or enhances the special character and visual setting of the ACA including vistas, streetscapes and roofscapes.”

It is also Council policy to “conserve and protect buildings, structures and sites contained in the Record of Protected Structures and to carefully consider any proposals for development that would affect the special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly.” Any forthcoming proposal will have to consider the impact it may have on the character and setting of Protected Structure The Mill House. The subject proposal is considered to be sufficiently removed from the Protected Structure so that it does not have any impact on existing heritage values.

The findings of the Architecture Heritage and Conservation Impact Assessment by Slattery Conservation Architects is as follows:

The proposed development will have minimal impact on

- The character of Whitechurch Road
- The Mill House (Protected Structure)
- The ACA.

*“The proposed development will have a positive impact on the character of the area, enhancing the residential status and amenity of Whitechurch Road where at present there a number of vacant sites and development proposals being considered or granted. It will also improve the residential density of the area reinforcing public transport and other public facilities.*

*The development will have minimal impact on the character of the road and existing buildings including the Mill House and will offer a central green space that will complement the sylvan setting of this section of Whitechurch Road.*

*The character of the rear setting cannot be considered particularly significant, despite its inclusion in the ACA. The rear area is separated by the walled off previous location of the stream and the impact on the ACA will be limited by separation and development of a landscape proposal including trees.*

*The development as proposed, will improve the residential amenity of the area along with its interface to and character of its setting. The proposed development is therefore considered worthy of support.”*

We therefore submit that the subject proposal is acceptable within the current setting and does not have any notable impact on buildings of a historical or heritage value in the area.

### 8.3 Key Development Standards

The key residential development standards from the South Dublin County Development Plan 2016-2022 are detailed below.

#### 8.3.1 Residential Density

Under their County Development Plan South Dublin County Council promotes higher residential densities at appropriate locations such as those that are located within walking distance of town and district centres and high-capacity public transport facilities:

*“In general, the number of dwellings to be provided on a site should be determined with reference to the Departmental Guidelines document Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009). As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high-capacity public transport facilities. 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. Local Area Plans, SDZ Planning Schemes and Framework Plans will set out density bands in growth areas.**”*

Housing (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.

Current proposals provide for a development of 22 units, which equates to a residential density of 37.9 units per ha. The site consists of a sizeable infill site of 0.58 ha, which is located within a 6-minute walk (approx. 500 m) to the nearest high frequency bus service. This is the Dublin Bus Route 16 Service to Dublin Airport, which arrives at a frequency of every 10 to 15 minutes.

The site is also an approx. 10 min walk to the nearest stop for the Dublin Bus Route 15b Service for Ringsend Road (every 10 to 15 min). The proposed Bus Connects programme will introduce Spine /

Branch Routes A2 and A4 (high frequency services) along Grange Road, which will have stops within an approx. 10-minute walk of the site. The site is therefore considered an appropriate site for a slightly increased residential density that is appropriate to retain existing levels of residential amenity at this location.

Given the recent publication of the Building Height Guidelines (*Urban Development and Building Height Guidelines 2018*) and given national policy to focus development in proximity to key public transport nodes, we are of the view that this proposal represents a fair and appropriate proposal for residential density. It is identified at this point that the current proposal delivers on all Development Plan development management standards, and this is a key factor in assessment of the proposed density vis a vis existing levels of residential amenity.

This proposal is therefore considered appropriate to site, and we trust that the Planning Authority will accept this approach.

### 8.3.2 Building Height

Section 11.2.7 of the County Development Plan states that the appropriate maximum or minimum height of any building will be determined by:

- “The prevailing building height in the surrounding area.
- The proximity of existing housing - new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 meters or greater is achieved. <sup>a</sup>
- The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space.
- The proximity of any Protected Structures, Architectural Conservation Areas and/or other sensitive development.”

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

*“To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).”*

The subject proposal incorporates a gradual height increase from the surrounding 2 storey dwellings in the area to the 3-storey with fourth floor setback contained within the subject proposal. The subject proposal is not a significant building height at 3/4 storeys and includes appropriate setbacks from adjoining properties to avoid any undue overlooking or overbearing impacts. The proposal also incorporates a defined central open space that creates an attractive streetscape at Whitechurch Road and additionally assimilates the proposal into the area. As evidenced in the attached conservation assessment, the subject proposal does not have any adverse impact on the nearby protected structure or ACA. The figures below illustrate how the proposed height is tapered at the boundaries with properties of 2 storeys (with pitched roof in some instances):

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<sup>a</sup> We note the following statement in the DP: *Development proposals that include ‘higher buildings’ that are greater than the prevailing building height in the area should be supported by a strong urban design rationale (as part of a Design Statement) and provide an appropriate series of measures that promote the transition to a higher building.*



### Gradual Height Increase from Boundary with Adjoining Properties

Overall, we submit that the proposed building height of 3-4-storeys is acceptable and is not excessive given the building heights in the surrounding area, its close proximity to public transport and the provisions of ‘Urban Development and Building Height – Guidelines for Planning Authorities’ whereby additional height is encouraged to make the best use of available infill land. The site is at a highly accessible location approx. 10 min walk to the nearest stop for the Dublin Bus Route 61 or 15b Service that connects to the City Centre, Santry and Dublin Airport (every 10 to 15 min). Routes 75/75A and 17/17D serve stops on Grange Road to the north of the site and provide orbital service connections to Tallaght, Dundrum, Dun Laoghaire, Sandyford/Stillorgan, Rialto, Blackrock and UCD. The proposed Bus Connects programme will introduce Spine / Branch Routes A2 and A4 (high frequency services) along Grange Road, which will have stops within an approx. 10-minute walk of the site. Bus corridor 12 will be located c.550m to the north of the site and will connect Rathfarnham to Dublin City Centre via Terenure and Rathmines. The overall bus connectivity in the area will result in more attractive travel times in addition to improved journey time reliability.

The site in itself provides a setback to the public road and a central area of open space that enhances the streetscape and the public realm in the vicinity. As evidenced from the attached Architectural Heritage Impact Assessment by Slattery Conservation, the subject proposal does not impact on any protected structures, Architectural Conservation Areas or other sensitive development. An Architectural Design Statement is also attached to this application to provide a context for the subject proposal in the context of built form and architectural merits of the proposal.

#### 8.3.3 Bicycle Parking Standards

Table 11.22 of the County Development Plan sets out the Minimum Bicycle Parking rates for all new development. Bicycle parking rates are divided into two main categories:

- **Long Term:** These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- **Short Stay:** These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.

A mixture of on-curtilage (back garden space) bicycle parking, bike storage sheds for mid terraced units and 12- visitor bike parking spaces are provided in the subject proposal.

#### 8.3.4 Car Parking Standards

We note 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 centers within 400m of a high-quality transport service (train, luas or bus stop with a high-quality service). Therefore Zone 1 standards below are applicable to the subject site.





Table 11.24 sets out the Maximum Parking rates for residential development. Parking rates are divided into categories and the site is considered to be located within Zone 1 – General rate applicable throughout the County.

DWELLING TYPE	NO. OF BEDROOMS	ZONE 1
<b>Apartment</b>	1 Bed	1 space
	2 bed	1.25 space
<b>Duplex</b>	3 bed+	1.5 spaces
<b>House</b>	1 Bed	1 space
	2 Bed	1.5 space
	3+ bed	2 space

The County Development Plan 2016-2022 sets a maximum parking rate of 2 no. car parking spaces per 3+ bed dwellings. Based on the Development mix for the proposed development of 22 no. 4-bed houses, there is a total requirement of 44 car parking spaces. We can confirm that a total of 44 no. car parking spaces are proposed on site to meet standard requirements.

### 8.3.5 Private / Public Open Space

#### 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 580 sq. m of Public Open spaces which equates to 10% of the overall development, which meets the required provision.

- 5801 sq.m x 10% = 580.10 sq.m.

The proposed development includes a landscaping plan prepared by Park Hood Chartered Landscaping Architects which responds to the particular characteristics of the site.

Easily accessible to all residents, the central and communal public open spaces will benefit from the passive surveillance of a number of the units and will create a quality amenity area.

#### 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.

**Table 11.20: Minimum Space Standards for Houses**

Type of Unit	Houses	Private Open Space
One Bedroom	50 sq.m	48 sq.m
Two Bedroom	80 sq.m	55 sq.m
Three Bedroom	92 sq.m	60 sq.m
Four Bedroom or more	110 sq.m	70 sq.m

Based on the above Development Plan provisions, we note the following requirements for private open space is 70 sq.m. Enclosed with this application is the Housing Quality Assessment by BBA Architects

which shows that each of the proposed developments meets the minimum requirement other than one unit which is slightly below standard requirements (0.7sqm). We submit the overall quality of the scheme is sufficient and this slight departure from minimum standards is acceptable given all other relevant criteria are addressed.

House Unit Type	Private Open Space	Proposal
4 Bed Houses	70 sq. m	69.3-133.5 sq. m



Figure 17: Proposed Private /Public Open Space

### 8.3.6 Separation Distances

The Development Plan clearly outlines that a separation distance of 22 m 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 m or a front garden. Section 11.2.7 of the South Dublin County Development states new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved. This objective is contrary to the provision of increased densities at the subject site and would require a large oration of the subject site to be surrendered to an effective buffer zone.

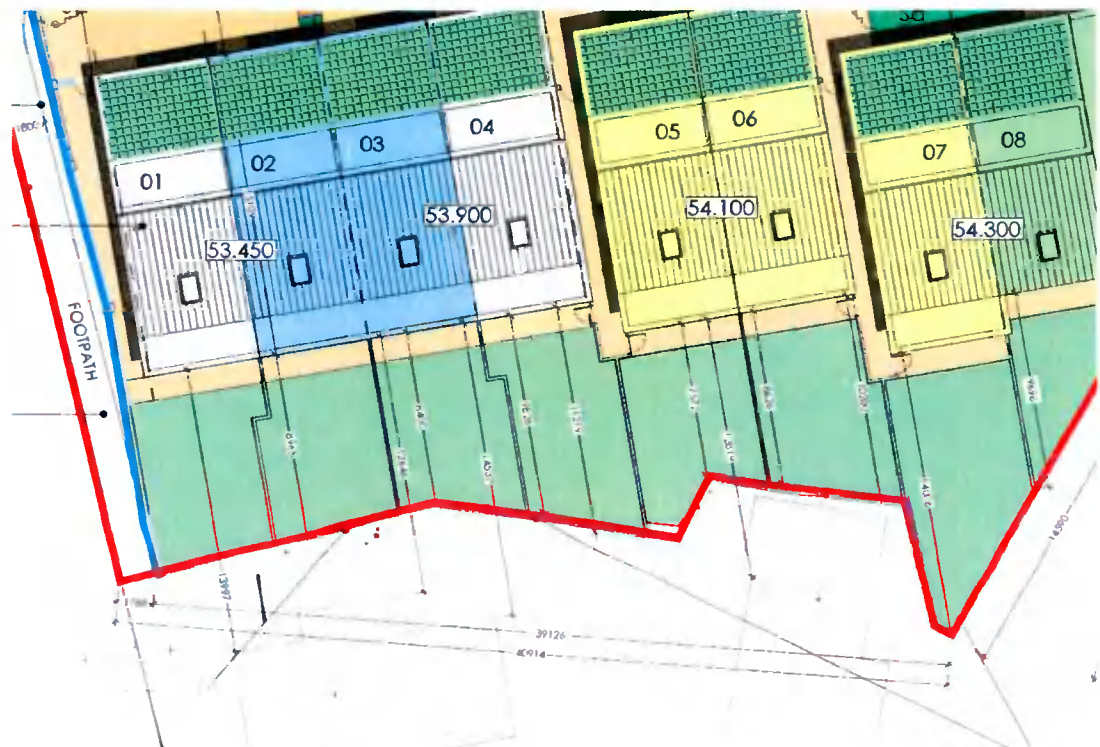
The separation distance from adjoining residential dwellings from the proposed development range from 12,819 m – 13,997 to the south (to the side boundary/elevation of adjoining property), 16,908 m to the east (also to the side boundary/elevation of adjoining properties) and 28,070 m - 35,425 m to the North.

We confirm that these standards marry several competing objectives including provision of adequate private and public open space, appropriate density at an infill site close to public transport and provision for appropriate internal amenity for future residents.

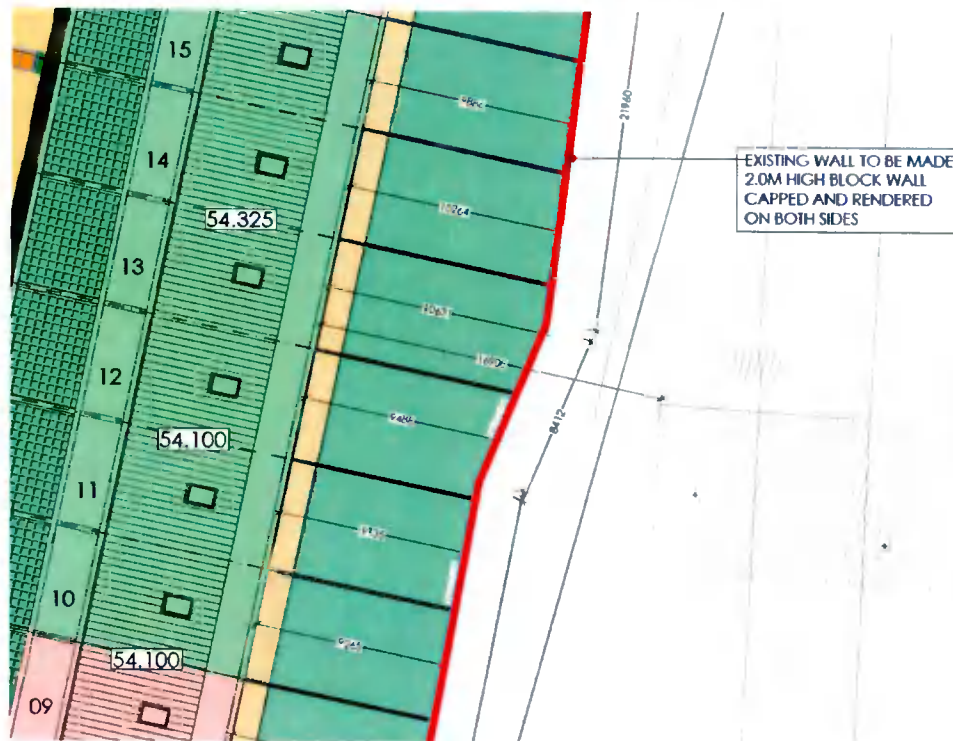
Section 2.23 of the Design Standards for New Apartments states the following with regard to separation distances:

*“The National Planning Framework signals a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance based standards to ensure well-designed high quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in development plans, should be replaced by performance criteria, appropriate to location.”*

The subject proposal provides a high quality design solution at this location that provides an appropriate density, with adequate residential amenity and high quality finishes. Any overlooking that occurs is to the side gable of existing dwellings where there are minimal openings and therefore reduced opportunities for any loss of privacy. The separation distances provided are shown below.



Separation Distances to the south



Separation Distances to the east



Separation Distances to the North

Figure 18: Separation Distances from adjoining residential developments

### 8.3.7 Mix of Dwelling Types

The proposed development will be comprised of:

- 22 no. 4 Bed Houses

Under Section 11.3.1(i) the County Development Plan states the following regarding dwelling mix:

*“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. With the exception*

*of student accommodation, proposals that include a high proportion of one-bedroom dwellings (more than 10%) shall be required to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. Design Statements for residential or mixed-use development proposals with a residential element (see Section 11.2.2 Design Statements) will be required to address the mix of dwelling types.”*

With the overall trend towards one and two bed apartment dwellings in the wider Dublin area, the subject proposal provides 22no. 4-bed family sized units that are considered an appropriate mix for this site and this location and provide adequate variety to the local property market.

#### **8.3.8. Services**

The existing drainage network in the vicinity of the subject site and proposed services within the subject proposal is as follows:

- **Wastewater**

There is an existing  $\varnothing 225\text{mm}$  wastewater sewer network located under Whitechurch Road flowing northwards. It is proposed to outfall the wastewater from the site into this network

- **Water**

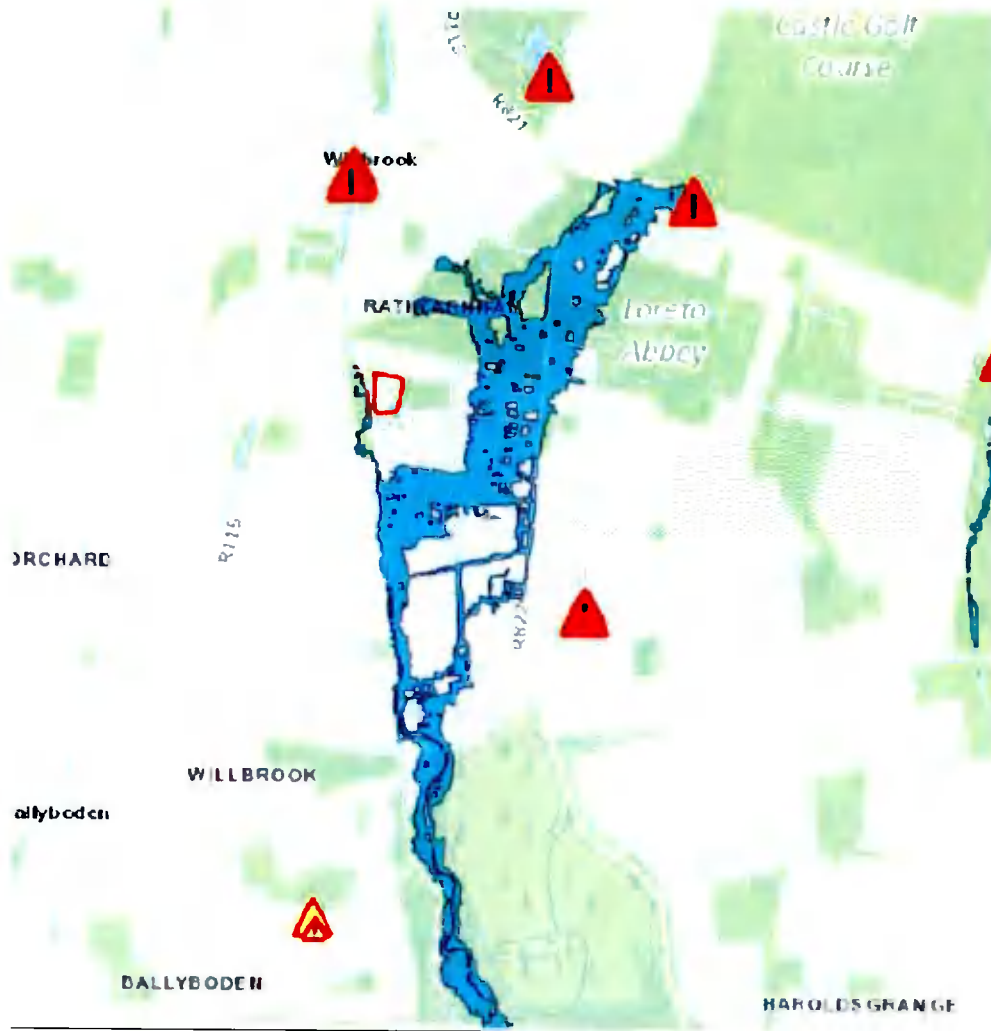
There is an existing 100mm (1969) uPVC watermain located under Whitechurch to the West of the site.

- **Surface Water**

The Whitechurch Stream, a tributary of the River Dodder, is located to the West of Whitechurch Road. It is proposed to store the surface water run-off from the site in an attenuation tank system and outfall into this stream.

#### **8.3.9 Flood Risk**

All sources and predictive maps indicate that the development is classed as Zone C in accordance with the Guidelines on the Planning System and Flood Risk Management 2009. Additionally, historic information was reviewed in relation to pluvial fluvial, coastal and groundwater in the subject lands, and **no significant flood events in the immediate vicinity of the subject site were recorded**, however there has been some recorded flood events in the surrounding areas.



Recorded Flood Events (Extract from [www.floodinfo.ie](http://www.floodinfo.ie))

As concluded in the attached Flood Risk assessment by POGA Consulting Engineers, the site is considered as an overall low risk of flooding and is suitable for development.

## 9 NATIONAL PLANNING CONTEXT

It is our considered opinion that in addition to the Local Planning Context outlined above with regards to this application, the following policy documents are also identified as follows:

- National Planning Framework – Project Ireland 2040
- Housing for All – A New Housing Plan for Ireland
- Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031
- Urban Development and Building Height Guidelines

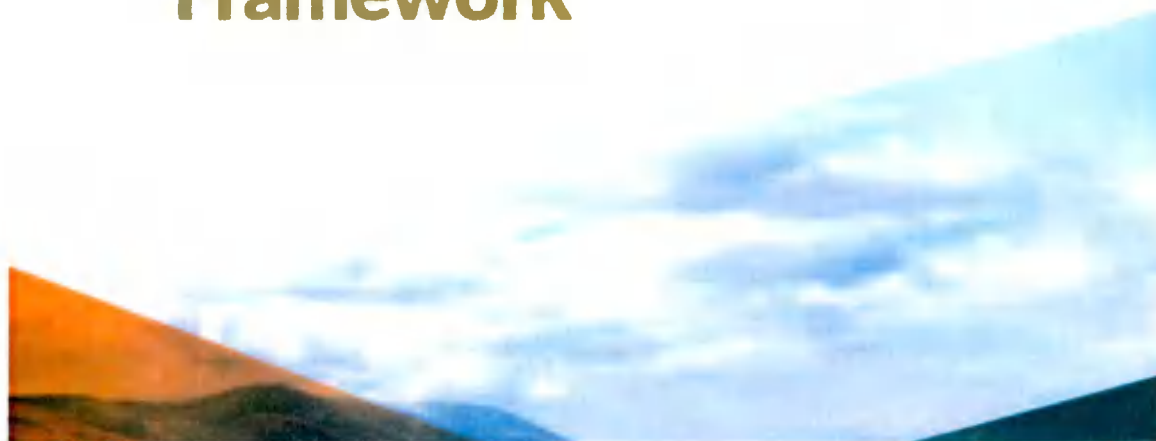
### 9.1 National Planning Framework



Rialtas na hÉireann  
Government of Ireland

Project Ireland 2040

# National Planning Framework



The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. It caters for:

- The extra one million people that will be living in Ireland by 2040;
- The additional two thirds of a million people working in Ireland by 2040; and
- The half a million extra homes needed in Ireland by 2040.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centers of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.



As a strategic development framework, this Plan sets out the long-term context for the country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional and local levels.

The following policies are considered key in the context of this site:

**National Policy Objective 1 -**

*Planning for a population in the Eastern and Midland Region of 490,000 - 540,000 additional people i.e. a population of around 2.85 million.*

**National Policy Objective 3a -**

*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

**National Policy Objective 3b -**

*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 their existing built-up footprints.*

**National Policy Objective 31 -**

*Prioritise the alignment of targeted and planned population and employment growth with investment in the provision of childcare facilities and new and refurbished schools on well located sites within or close to existing built up areas that meet the diverse needs of local populations.*

**National Policy Objective 32 -**

*To target the delivery of 550,000 additional households to 2040.*

**National Policy Objective 33 -**

*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

**National Policy Objective 35 -**

*Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

It is submitted that the current proposal for 22 new residential units will deliver on the above objectives of the NPF. We note specifically that the addition of 22 new residential units will be a modest and proportionate increase to population within the Rathfarnham area. The site is also zoned for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable residential development in close proximity to the main neighbourhood centre area and public transport nodes.





## 9.2 Housing for All: A new Housing Plan for Ireland



Rialtas na hÉireann  
Government of Ireland

# Housing for All

A new Housing Plan for Ireland



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:

- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.

- Over 300,000 new homes to be built by 2020, including a projected 54,000 affordable homes for purchase or rent and over 90,000 social homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

The HFA is to be the largest State led building programme in our history and is financed by the biggest State funding commitment ever. The HFA also has the largest ever housing budget in the history of the State to transform our housing system, with an excess of €20 bn in funding through the Exchequer, the Land Development Agency (LDA) and the Housing Finance Agency over the next five years.

It is also apparent from the HFA plan that high-density housing is to be supported. Within the plan, a new fund the Croí Cónaithe (Cities) Fund has been introduced to further the implementation of planning permissions for apartments. Housing policy objective 15, no. 15.1 states that the HFA plan will *“Introduce the Croí Cónaithe (Cities) Fund to ensure that planning permissions for apartments in high density areas already secured by 2021 are activated by the end of 2025 for build to sell.”*

In addition to this, the new fund will focus on *“activating housing supply through enhanced viability measures targeted at developing properties for individual household purchasers, including first-time buyers and right-sizers.”* The fund will *“stimulate activation of existing planning permissions for build-to-sell apartment developments of four floors or more, above a certain density threshold, and this will be complemented by the sanction of a tax to activate vacant lands for residential purposes.”*

Moreover, housing policy objective 11, no. 11.2 supports high-density housing: *“Develop section 28 Guidelines for Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on housing typologies to facilitate innovative approaches to medium and higher densities.”*

Additionally, housing policy objective 12, no 12.2 is to deliver a new approach to active land management: *“Develop proposals for new Urban Development Zones, to DHLGH deliver a coordinated and transparent approach to the delivery of residential and urban development, particularly on brownfield sites, meeting the compact growth objectives of the National Planning Framework.”*

Furthermore, the HFA plan will drive economic sustainability and reduce constructions costs. Objective 23, 23.11 states that the HFA plan will *“Reduce C&D waste and associated costs by working with the construction industry on demonstration projects to show how best practice (specifically in relation to urban high-rise apartment developments) waste segregation and other waste management measures, can reduce overall C&D disposal costs.”*

The subject proposal for 22no. dwellings in 4-bed units, at this well located site is consistent with the provisions of the Housing for All Plan through the delivery of much needed family sized homes.

9-3 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031

**Eastern & Midland Regional Assembly**

# Regional Spatial & Economic Strategy

**2019-2031**



The Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES) has recently been published and adopted.

The RSES provides a:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is located within the area identified as Dublin City and Suburbs and is part of the Dublin Metropolitan Area.



Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 37.9 units per ha and has had regard to specifically to standards as set out in the ‘Sustainable Urban Housing - Design Standards for New Apartments Guidelines for Planning Authorities (2018)’ and ‘Urban Development and Building Heights Guidelines for Planning Authorities (2018)’ in ascertaining an appropriate residential density, height and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density on a site with exceptional public transport accessibility. The site is an approx. 6-minute walk (approx. 500 m) to the nearest high frequency bus service. This is the Dublin Bus Route 16 Service to Dublin Airport, which arrives at a frequency of every 10 to 15 minutes. The site is also an approx. 10 min walk to the nearest stop for the Dublin Bus Route 15b Service for Ringsend Road (every 10 to 15 min). The proposed Bus Connects programme will introduce Spine / Branch Routes A2 and A4 (high frequency services) along Grange Road, which will have stops within an approx. 10-minute walk of the site.
- The proposal utilises a key infill site on a prime suburban site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this built-up area of Dublin.

#### 9.4 Urban Development and Building Height Guidelines (2018)

The ‘Urban Development and Building Heights, Guidelines for Planning Authorities (2018)’ are intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. The competent authorities are obliged to consider the content of these guidelines in consideration of the matter of building height.

Section 1.14 of the document sets out the following:

*“Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”*

Notwithstanding, the content of the South Dublin county Development Plan, the Urban Development and Building Height Guidelines are the predominant context for assessment of height in this case.

From the outset, it is noted that the Building Height Guidelines (2018) expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

##### **Policy Context**

Furthermore, we note that the Guidelines states that in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centers and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively*



*supporting the National Strategic Objective to deliver compact growth in our urban centers?*

- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

As a response to the above criteria, we note the following:

- As set out in this report, the proposal secures the relevant objectives of the National Planning Framework.
- The proposal generally complies with the provisions of the South Dublin County Development Plan as the proposal is a graduated height of 3-4 storeys, is significantly separated from adjoining properties and incorporates appropriate landscaping to integrate the proposal into the subject site.



## 10 CONCLUSION

We invite the Planning Authority to positively consider the proposal now in front of them. We note the following key summary points:

1. The current national policy mandate requires the expedient delivery of infill residential housing of an appropriate density and height. The current proposal for 22 residential units can positively contribute towards meeting the severe deficit in housing supply identified in national policy.
2. For all the reasons set out in all documentation it has been demonstrated that the application is robust and in compliance with all relevant strategic and statutory guidance, marrying somewhat competing objectives of increased density, adequate protection of existing residential amenity, dwelling mix and provision of sufficient open space within the site.
3. The site is zoned Objective A “*To protect and/or improve residential amenity*” which explicitly provides for residential development.
4. As stated, the proposal is in accordance with the relevant statutory documents and there is an appropriate planning context for this proposal.
5. The proposed residential density will be approx. 37 units per ha and heights are set at a maximum of 4 storeys. It is considered that the site can easily accommodate this proposal for density and height given its proximity to public transport.
6. We can confirm that we have addressed insofar as possible all pre-planning feedback from South Dublin County Council.

We ask that the Planning Authority consider these points in their review of proposals, and we trust that they will view this planning application as a positive move towards delivery of sustainable development on zoned lands.



**11 APPENDIX A – Pre-Planning Minutes**



**PP045/21**

**Location**

Silveracre Bungalow, Whitechurch Road, Rathfarnham, Dublin 14.

**Proposal**

Demolition of a single storey detached dwelling and ancillary works with the proposal of two options for the development. Option 1: Proposed development of 22 x 4 & 5 bed 3 storey townhouse with private roof terraces at 4th floor. Option 2: Proposed development of 16 x 3 storey townhouses with private rooftop terraces at 4th floor and a 4 storey apartment block comprising 16 units being a mix of 1 & 2 bed apartments.

**Team's meeting – 4<sup>th</sup> June 2021**

**Preplanning meeting under S247 of Planning and Development Act 2000 (as amended) without prejudice**

**Applicants**

Luis Reis BBA Architects  
Mick Browne – BBA Architects  
Cionna Stokes – Dunmoy  
Jonathan Turner – Dunmoy  
Laura Brock- Brock McClure Consultants  
James Howard – Howard Buildings

**SDCC**

Jim Johnston (Planning)  
Barry Henn (Planning)  
Yasir Kahn (Roads)  
Ronan Toft (Water Services)  
Brian Harkin (Water Services)

**LB/LR**

- Introduction

**JJ/BH (Planning)**

- Site is former caravan park
- Subject to RES zoning objective
- Width – southern boundary, on the narrow side, dwellings only 5.5m
- Provide detail on Greystones development
- Rear elevation – have regard to overlooking, clarify separation distances
- House option – preference for this option over mix of apartments and houses, public open space would be larger and better quality than apartment option, less surface parking, better surveillance
- Concerns with incremental approach of houses and apartments
- Rear gardens seem tight, particularly NW and SE corners of site, some tweaking likely to be required

- Cul de sacs – only one turning head
- House option – southern part of site, two pairs of semi's, sharing rear garden access, could improve by providing rear garden access
- Offsetting private amenity space – have regard to exempted development, setbacks of development in adjoining sites
- Encouraged to look at side elevations and how they would work as design progresses, provide interest, surveillance, particularly any units that face the main road
- Provide photomontages, range of views
- Close to stream
- Japanese Knotweed in the area
- Clarify what is proposed to wall in north and east boundary
- Old mill race – Heritage – may wish to contact Heritage Office and Architectural Conservation Officer (Rosaleen Dwyer and Irenie McLoughlin).
- Provide details of set back from mill race
- Landscaping scheme would be required, contact Oisín Egan in Public Realm for more advice, children's play space
- Part V – contact Housing Department

#### **YK (Roads)**

- Turning heads 8 and 16, tweak to make work, swept path analysis
- Emergency vehicle access
- Main access – visibility splays, sightlines, TII standards
- 2m wide footpaths along site frontage and minimum of 1.8m internally
- Car parking – Table 11.24 of CDP (10% electric, 5% mobility impaired)
- Bicycle Parking – provide middle ground between SDCC and Apartment guidelines if apartment option, refer to table 11.24 of CDP, should be covered and sheltered
- Traffic and Transport Assessment – use data from 2018/2019. Current date would be different due to COVID restrictions, less vehicles
- Bin storage and management, show location and access
- Cycle track on main road – how could access point be joined to this?
- Construction Traffic Management Plan and Construction Demolition and Waste Management Plan required
- Mobility Management Plan
- Lighting report
- Taken in charge drawing
- Road Opening Licence

#### **RT/BH (Water Services)**

- Maps of services can be requested from [servicemaps@sdblincoco.ie](mailto:servicemaps@sdblincoco.ie)
- Surface Water – full infiltration or discharge to Whitechurch Stream, clarify
- Flood alleviation scheme – [info@whitechurchfas.ie](mailto:info@whitechurchfas.ie) recommended to discuss proposals, 2l second/Ha min requirement
- Attenuation – SuDS, use as much natural as possible, tree pits, porous paving, swales, detention basins, green roofs



- **Flood Risk Assessment required – OPW guidelines**
- **Foul and Water – mains on road, pre connection enquiry with Irish Water, confirmation of feasibility, advised to contact ASAP, preference to have letter with application**
- **Whitechurch Stream – crossing sewers and watermains, vertical separation distances required, minimum depth of cover**



