



**SIMON CLEAR & ASSOCIATES
PLANNING AND DEVELOPMENT
CONSULTANTS**

Senior Executive Planner
Planning Department
South Dublin County Council
County Hall
Belgard Square North
Tallaght
Co. Dublin

18th May 2022

**Re: Request for Permission for modifications to development permitted under
Ref. SD20A/0306 at 21 Whitehall Road West, Dublin 12**

Dear Sir/Madam,

I have been requested by my clients, Carl Properties Limited, to apply for planning permission for modifications to a permitted development at 21 Whitehall Road West, Dublin 12 permitted under Ref. SD20A/0306. The permitted development is for 14 no. apartments in a 4-storey building with a setback at the third-floor level. The modifications relate primarily to an alternative access directly from Whitehall Road West and consequential changes, with a reduction to 13 apartments, as explained below.

Please find enclosed:-

- Planning application form;
- Copy of statutory notices;
- Architects drawings x 6 (see Douglas Wallace Architects schedule of drawings);
- Section 97 Certificate of Exemption;
- Planning application fee (€925 EFT transfer enclosed)



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1.0 Overview

The owners and applicants, Carl Properties Limited, received planning permission under Ref.SD20A/0306 for 14 apartments in the permitted scheme, as amended per Condition 2(3), with the final grant of permission issued on 25th June 2021. A declaration regarding unencumbered use of the access road for over 4-decades was provided in the response to the RFI for that planning application.

The permitted scheme (SD20A/0306) has been modified in this application to propose an alternative vehicular access onto Whitehall Road West, with ancillary modifications to the floorplans of apartments. Further details of the proposed development are provided below.

2.0 Site Location and Context

The subject site has an area of 686m² and is located on Whitehall Road West facing south over a large area of public open space. The site is currently occupied by a car garage and is bound to the northwest by a 3-storey apartment development, Wellington Court, with which there is a shared access. A 2-storey building accommodating 12 apartments, Loyola House, is located to the northeast along with a row of shops and commercial premises adjacent to the Ashleaf Shopping Centre, all located on Whitehall Road West, which is a bus route.



Site Location Map with Site Outlined in Red

Source: OSI

3.0 Proposed Development

The proposal is for modifications to the development permitted under Ref. SD20A/0306, to provide an alternative vehicular entrance onto Whitehall Road West while retaining the same number of car parking spaces undercroft the building, with a consequential reduction of 1 no. unit resulting in 13 no. apartments in a building with the same footprint and storey-height as that permitted under Ref.SD20A/0306. There will be minor associated adjustments to elevations, with the architectural concept remaining fundamentally the same. All other engineering services and landscaping adjustments will be fundamentally unaltered.

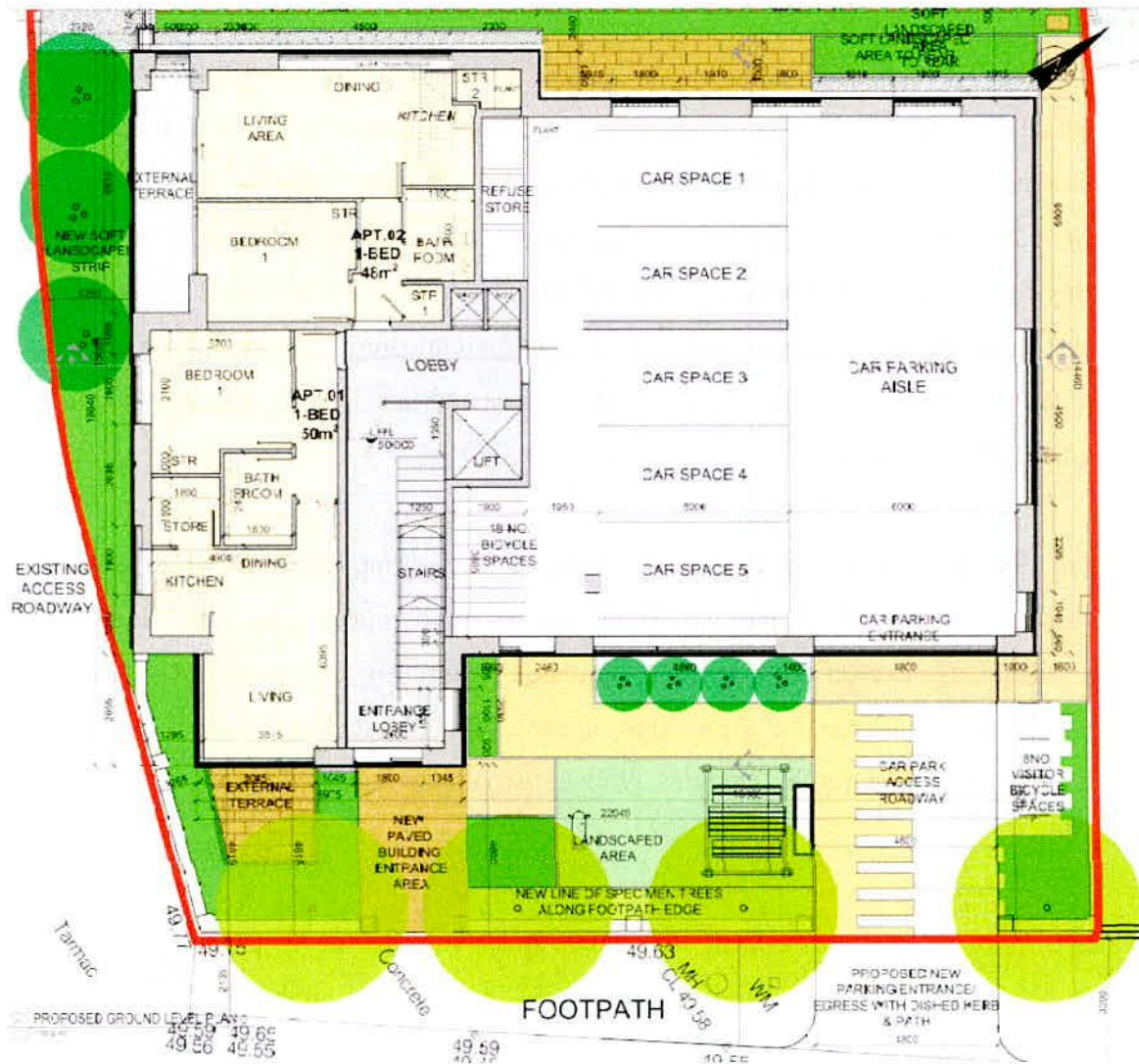
At ground floor level 1 no. apartment is removed to accommodate the revised access arrangement and undercroft car parking. Modifications on the upper floors are minor and all units still greatly exceed the minimum standards required by the *Sustainable Urban Housing: Design Standards for New Apartments 2020*. Please refer to the enclosed architect's drawings prepared by Douglas Wallace Architects for details of modifications on each floor.

Two sets of drawings are provided by Douglas Wallace Architects – as permitted and as modified. The modifications are minor and many, so they are not 'bubble' highlighted as would be the normal representation.

The following table details the proposed breakdown of accommodation in comparison to that permitted: -

Unit Size	Permitted under Ref. SD20A/0306	Proposed
1-bed	10	9
2-bed	4	4
Total	14	13

Despite the reduction in 1 no. unit, the quantum of car parking (5 spaces) and bicycle parking (18 spaces) for residents remains unchanged from the permitted development.



Proposed Ground Floor Layout with Revised Car Parking Layout and Omission of 1 no. Residential Unit

4.0 Planning Policy

The parent permission (Ref. SD20A/0306) established that the principle of a part 3-storey, part 4-storey residential building with apartments was acceptable on the subject site. In the interest of brevity all planning policy is not repeated here.

4.1 South Dublin County Development Plan 2016-2022

The subject site is zoned Objective RES – to protect and/or improve residential amenity within the SDCDP.



SDCDP Zoning Map with Site Outlined in Red

Residential accommodation is permitted in principle under the zoning objective RES.

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

5.0 Development Standards

The provisions of the SDCDP 2016-2022 and relevant National Guidelines have been considered in the design of the proposed apartments.

Floor Area Standards

The apartments have been designed in accordance with "*Sustainable Urban Housing – Design Standards for New Apartments 2020*." The minimum floor area for a one bedroom is 45m² and two-bedroom (four person) unit is 73m². The proposed units meet and exceed the minimum floor areas required with the one-bed units ranging from 48m² to 54m². The two-bed units range from 76m² to 82m². 10 no. units (77%) exceed the minimum floor area required by 10% or more, which is in accordance with the Apartment Guidelines.

Aspect and Orientation

Specific Planning Policy Requirement 4 outlined in *Sustainable Urban Housing – Design Standards for New Apartments* contains a provision for schemes on site up to 0.25ha, which states that “*planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*”

In accordance with the objective of the “*Sustainable Urban Housing – Design Standards for New Apartments,*” 11 (85%) of the total residential units proposed are dual aspect with the 2 no. single aspect units facing southeast. The aspect and orientation of the proposed apartments is in accordance with the *Sustainable Urban Housing Design Standards for New Apartments Guidelines*.

Private Amenity Space

Private amenity space is provided for each unit in the form of terraces. Please refer to the floor plans and schedule of accommodation prepared by Douglas Wallace Architects for further details. All areas of private amenity space are in accordance with the *Sustainable Urban Housing Design Standards for New Apartments Guidelines*.

Unit No.	No. of Bedrooms	Unit Area (m²)	Private Amenity Space (m²)
1	1	50	5
2	1	48	9.7
3	1	50	5
4	2	76	9.7
5	2	82	8.4
6	1	50	8.4
7	1	50	5
8	2	76	9.7
9	2	82	8.4
10	1	50	8.4
11	1	50	5
12	1	53	9.7
13	1	54	10.2

Communal Open Space

According to the “*Sustainable Urban Housing – Design Standards for New Apartments*” it is not essential that communal open space be provided on the site at all. Section 4.12 of the guidelines states that “*For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, communal amenity space may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality.*”

However, in this case an external communal amenity space was provided under Ref. SD20A/0306 and remains in the proposed modification. The communal amenity space includes a roof terrace (95m²) accessed from the third-floor area (increased slightly from 92m² previously permitted). Amenity spaces are provided at ground level and include a landscaped area to the front and the rear of the proposed building.

The landscaped area to the front includes a lawn area, an animal sculpture structure for imaginative play and a pergola with tables. The areas provided in the proposed development cater for all age groups.

Storage

Each apartment has individual storage areas in accordance with the *Sustainable Urban Housing Design Standards for New Apartments Guidelines*. Please refer to the enclosed floor plans and schedule of accommodation prepared by Douglas Wallace Architects for details of storage within each unit.

Car Parking

5 no. car parking spaces are provided for the 13 no. units proposed under this modification application. 5 no. car parking spaces were provided for the 14 no. units permitted under Ref. SD20A/0306.

Bicycle Parking

The *Sustainable Urban Housing: Design Standards for New Apartments 2020* require a general minimum standard of 1 cycle storage space per bedroom and visitor cycle parking at a standard of 1 space per 2 residential units.

18 no. bicycle parking spaces for residents are provided for in the undercroft area adjacent to the car parking spaces.

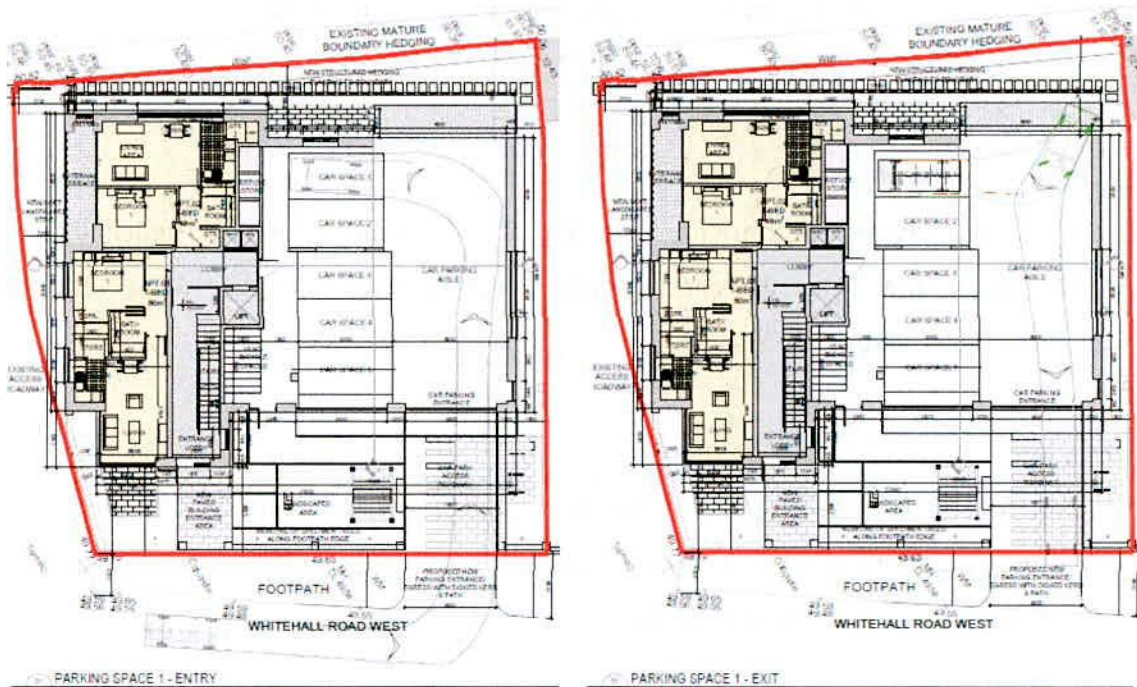
8 no. visitor bicycle parking spaces are provided in the amenity area located to the front of the proposed building, along Whitehall Road West.

The proposal provides a total of 26 no. bicycle parking spaces, which exceeds the standards set out in the Sustainable Urban Housing Design Standards for New Apartment Guidelines and the National Cycle Manual.

Whitehall Road West is designated as a section of the NTA Greater Dublin Cycle Network Plan. Bicycle parking is provided in line with the Guideline requirements.

6.0 Engineering/Services

Whitehall Road is wide and fundamentally straight along the site frontage and required sight-line requirements are satisfied at the proposed junction location. Please refer to the Proposed Site Layout Plan for details. Use of the side road will be reduced from the existing level of traffic by elimination of the car service garage associated traffic. The traffic on the side road will be reduced and limited entirely to that generated by the Wellington Court apartments.



Swept path analysis has been conducted for access/egress at all car parking spaces. Servicing access is accommodated in the undercroft area.

No changes are proposed to the engineering services permitted under Ref.SD20A/0306.

7.0 Appropriate Assessment Screening

An *Appropriate Assessment Screening Statement* was prepared by Simon Clear & Associates for the planning application submitted under Ref. SD20A/0306. The screening concluded that there is no likelihood of any significant effects on a Natura 2000 site arising from the proposed development and it was considered that Stage 2 Appropriate Assessment was not required.

The subject proposal is for minor amendments to the permitted development and it is considered that there is no likelihood of any significant effects on a Natura 2000 site arising from the proposed development and it is considered that Stage 2 Appropriate Assessment is not required.

8.0 Part V

A Section 97 Certificate of Exemption (CE21/0009) was granted for the parent permission, which proposed 15 no. units at application stage.

The subject modification proposes to reduce the number of permitted units from 14 to 13 and the site area remains below 0.1ha. It is considered that the previous Section 97 Certificate of Exemption, granted under Ref. CE21/0009 is still valid.

9.0 Summary and Request for Planning Permission

The subject proposal is for modifications to the access arrangement to the permitted development with the consequential omission of 1 no. unit and other minor modifications to the remaining units and elevations. It is requested that planning permission be granted with the attachment of appropriate conditions.

Simon Clear.

