

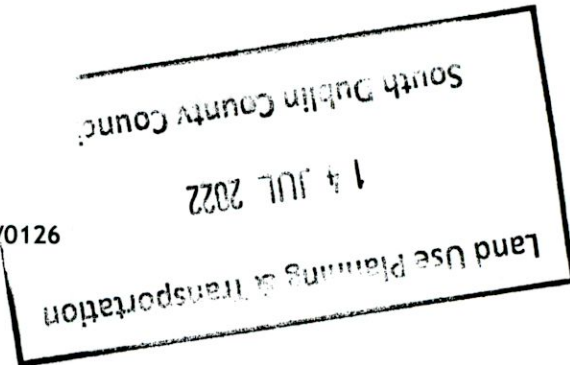
South Dublin County Council,
Planning Department,
County Hall, Belgard Square north,
Tallaght,
Co Dublin

ADDITIONAL INFORMATION Reg. Ref. SD22A/0126

12th July 2022

Re: **ADDITIONAL INFORMATION Reg. Ref. SD22A/0126**

Dear Sir / Madam,



On behalf of our Client, First Step Homes, we wish to lodge this response to the Additional Information request from South Dublin County Council, dated 24th June 2022. To support this Additional Information submission, we hereby include 6 No. copies of the following documentation

- **Cover Letter as prepared by CDP Architecture;**
- **Revised Issue Sheet as prepared by CDP Architecture;**
- **Revised Drawings as prepared by CDP Architecture;**
- **Building Lifecycle Report as prepared by CDP Architecture;**
- **Daylight + Sunlight Analysis Report as prepared by CDP Architecture;**
- **Response letter as prepared by PUNCH Consulting Engineers;**
- **Operational Waste Management Plan as prepared by PUNCH Consulting Engineers;**
- **Drawings as prepared by PUNCH Consulting Engineers;**
- **Letter from GSP Fire Ltd (Fire Consultant) dated 7th July 2022;**
- **Letter from RM Breen Associates (M&E Consultants) dated 6th July 2022**

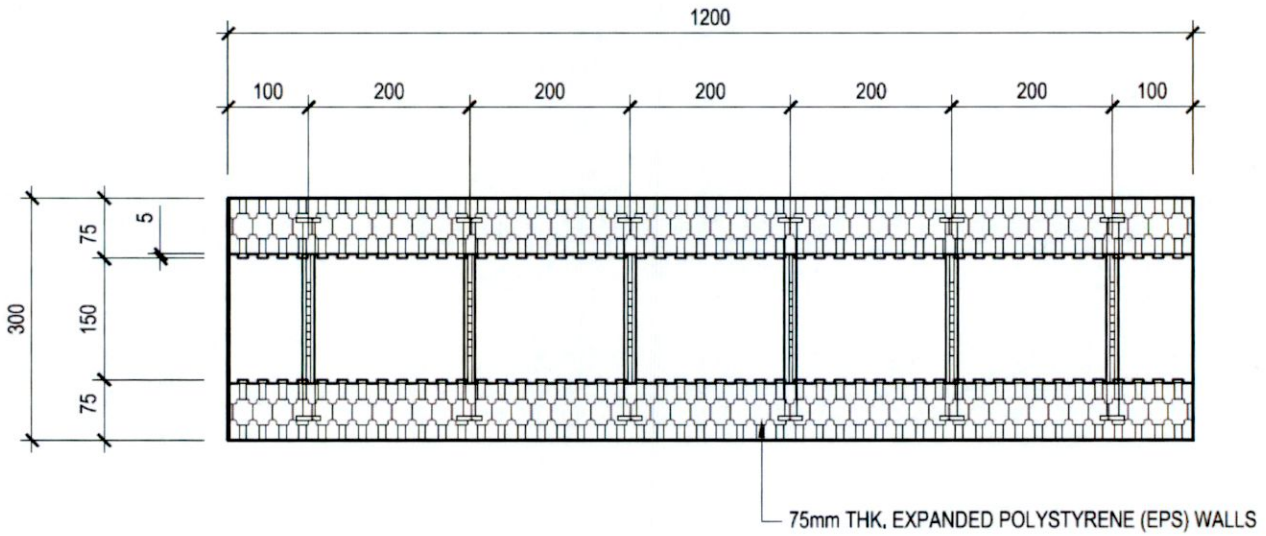
Additional Information Request Item 1 –

Building Height.

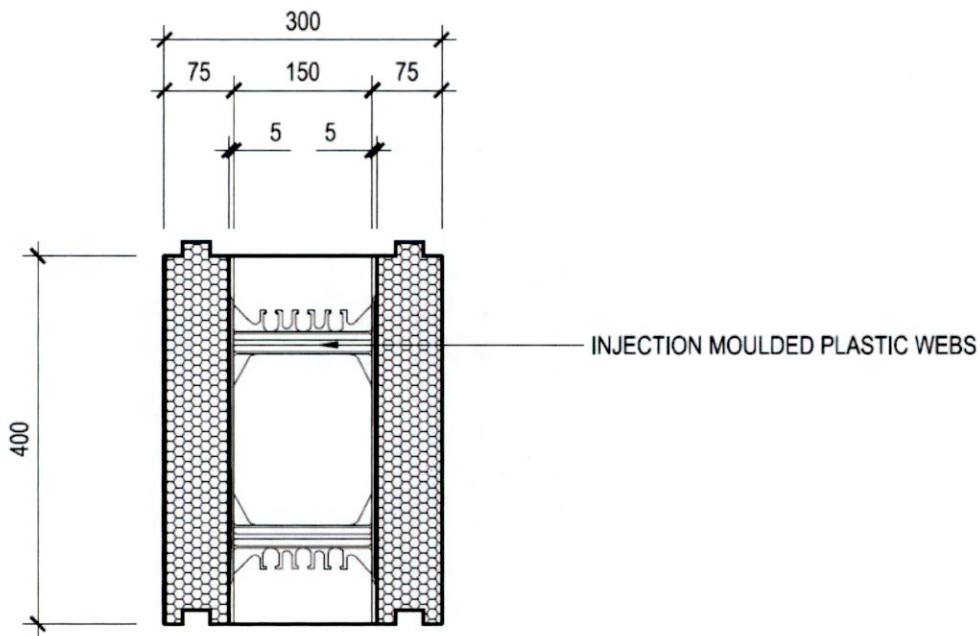
- (a) *The proposal would raise the building's parapet height by approx. 0.5 metres. The applicant's drawings are labelled to suggest that the prior permitted parapet height was 60.35m OD, but this would appear to be referring to a lift overrun. The applicant should provide a rationale for the proposed increase in height – why is it necessary – by way of additional information.*
- (b) *The increase in parapet height should be noted in revised notices.*

Response:

The proposed increase in height is necessary due to the modular system of construction proposed by the building contractor i.e., the use of Insulated Concrete Forms (ICF) modules. This has increased the height of each floor as these ICF modules only come in particular sizes. Please see plan and section of ICF below. This method of construction is proposed to ensure highest level of energy efficiency.



PLAN



SECTION

Additional Information Request Item 2 –

Privacy.

Proposed Apartments 37 and 38 are sited generally where apartment 201 was located in the permitted scheme. The south-west facing balcony of apt. 201 has been replaced with two south-east facing balconies on the south-east elevation of the building, facing the site boundary with 1A Loreto Terrace. It is inappropriate to have balconies at second floor level in this location due to the risk of overlooking and loss of privacy. The applicant should be directed to alter these proposals by way of additional information.

Response:

Please see drawing no. 3.1.108.

The two south-east facing balconies on the south-east elevation of the building have now been relocated to avoid overlooking and loss of privacy.

Additional Information Request Item 3 –

Material Treatment.

The applicant should provide a Building Life Cycle Report, or an update to any previous report, noting the benefits of the proposed material treatment via a vie reliability and cost of maintenance going forward. This can be submitted by way of additional information.

Response:

Please see enclosed Building Life Cycle Report as prepared by CDP Architecture.

Additional Information Request Item 4-

2-Bed, 3-person Units.

The applicant is advised that as per section 3.7 of the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), a maximum of 10% of any scheme should be 2-bed, 3-person units. In this case, that is a maximum of 3 units. The applicant is additionally advised that in the case of units 12, 14, 19, 20, 25, 27, 32 and 33, the Planning Authority has noted that these are compliant with, or in some cases very nearly compliant with, standards for 2-bed, 4-person units. The applicant should therefore reconfigure those units numbered above (12, 14, 19, 29, 25, 27, 32 and 33) to ensure they meet the standards of 2-bed, 4-person units and this can be achieved by way of additional information.

Response:

Please see drawing no. 3.1.106, 3.1.107 & 3.1.108.

Units 12, 14, 19, 20, 25, 27, 32 and 33 have now been reconfigured to 2-bed, 4-person apartments.

Additional Information Request Item 5 –

Aspect.

The proposed development includes a number of north-facing single aspect units (units 2, 12, 14, 25 and 27). The applicant should reconsider and reconfigure the layout to avoid the use of north-facing single aspect units. This can be an item of additional information.

Response:

Please see drawing no. 3.1.106, 3.1.107 & 3.1.108.

According to Chapter 13 of the Draft South Dublin County Development Plan 2022 – 2028, there shall be a minimum of 33% of dual aspect units required. The proposed development has a more than 60% dual aspect units.

Units 2, 14 & 27 are in the same positions as permitted units 009, 110 and 210. Moreover, unit 2 on the ground floor level is now provided with a box window to meet the daylight/sunlight requirements.

New south-east facing windows with translucent glazing have been proposed to units 12 & 25 to achieve dual aspect.

Additional Information Request Item 6 –

Sunlight/Daylight.

The reconfigured units are provided with a variety of shapes and layouts. There is concern regarding some of the units, in terms of levels on sunlight and daylight. The applicant should supply a Sunlight and Daylight Analysis by way of additional information which should assess the scheme against the BS EN 17037 standard.

The units of concern are:

- Units 9, 22 and 35 are long, narrow, single-aspect studio units. There is concern that the 'no sky line' and internal light levels would not be adequate.*
- A number of single aspect units at ground level appear to be sited under an overhang at first floor. There is concern that the 'no sky line', vertical sky component, and internal light levels, would indicate insufficient lighting to habitable spaces. This applies to units 2, 3, 4, 5, 7, 8, 9, and 10.*
- Unit 26 is provided with opaque glazing along one side which would be ok, but for the subdivision of the living space and lack of any view from the only window serving the main living area. This is not considered to be an appropriate treatment for a habitable room. Unit 26, which is provided in place of permitted unit 211, should be reconfigured to maximise the unobstructed light to living areas.*

Response:

Please see the Daylight + Sunlight Analysis as prepared by CDP Architecture enclosed and drawing no. 3.1.106, 3.1.107, 3.1.108, 3.1.201 & 3.1.203.

- The units of concern (9, 22 and 35) are now dual aspect units. In addition, box windows are now provided to these units to meet the daylight/sunlight requirements.*
- The units of concern (2, 3, 4, 5, 7, 8, 9 & 10) are in the same positions as the permitted units 009, 008, 007, 005, 004 & 003 & 002. Moreover, unit 10 is a dual-aspect unit and these units are now provided with box windows and enlarged windows to meet the sunlight/daylight requirements.*
- The internal layout of Unit 26 has now been reconfigured to maximise the unobstructed light to living areas. In addition, the opaque glazing has now been replaced with permitted translucent glazing.*

Additional Information Request Item 7-

Parking.

The Roads Report calculates that the maximum parking allowance at this site is 35 spaces. The applicant should revise their basement car park plans by way of additional information to adhere to the maximum standards found

in table 11.24 of the South Dublin County Development Plan 2016-2022. Provision of additional bulky storage areas at basement level would be a welcome replacement for car parking spaces and would improve the residential amenities available for prospective residents.

Response:

Please see drawings no. 3.1.105.

We have now provided 35 No. car parking spaces in the basement. The excess car parking spaces have now been replaced with bulky storage to improve the residential amenities.

Additional Information Request Item 8-

Larger Vehicles.

- a) *In terms of access for larger vehicles, the applicant should show how they are compliant with the relevant regulations, to the extent that they would receive a fire safety certificate for the proposed layout. Plans should show, using swept path analysis, how fire tenders can access the site if required. This is an item for additional information. The applicant should have cognisance of DMURS section 4.3.3 and the occasional access requirements for larger vehicles.*

Response:

Please refer to PUNCH drawing 212215-PUNCH-XX-XX-DR-C-0608 indicating an autotrack movement for fire tenders in accordance with fire consultant advice.

It should be noted that in accordance with fire consultant advice, a fire tender does not need to access the site. Please see enclosed letter form GSP Fire Ltd.

Separate advice from the fire consultant is provided in relation to fire safety certificate.

- b) *The applicant should also show by way of additional information how it is expected that refuse will be collected from the site and if bin lorry access is required on the site, provide swept path analysis showing that this is possible. The applicant should have cognisance of DMURS section 4.3.3 and the occasional access requirements for larger vehicles.*

Response:

It should be noted that the waste vehicle does not need to access the development site since waste is proposed to be collected at the kerb on Loreto Terrace.

Please refer to PUNCH drawing 212215-PUNCH-XX-XX-DR-C-0609 and 212215-PUNCH-XX-XX-DR-C-0610 indicating an autotrack movement for waste vehicles.

Please also refer enclosed Operational Waste Management Report outlining how waste is to be managed within the development.

Additional Information Request Item 9-

Charging of Electric Vehicles.

The Road Report also raises the issue of ECV charging spaces. The applicant should address this concern, noting that SDCC typically seeks that 10% of parking spaces are provided with charging facilities initially, and that 100% of the spaces are made capable of being fitted with charging facilities in the future. This is an item for additional information.

Response:

Please see letter from RM Breen Associates (M&E Consultant) enclosed.

Taking the accompanying information into consideration, on behalf of our client, we ask that South Dublin County Council grant permission for the above proposal. Please advise us in the event that there are any omissions or issues in relation to this Additional Information submission.

Yours Sincerely,



Paul Moran

Director CDP Architecture

Drawing Issue Sheet

Project: Proposed Residential Development at Grange Road, Rathfarnham, Dublin 14
 Job No.: 2020_134
 Drawing Series: Additional Information Reg. Ref. SD22A/0126

Date	12.07.22				
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Drawing No.	Drawing Title	Scale	Size	Revision			
Architectural Drawings							
3.1.008	Proposed New Site Plan with Ground Floor Plan	1:200	A2	A			
3.1.105	Proposed New Basement Plan	1:100	A0	A			
3.1.106	Proposed New Ground Floor Plan	1:100	A0	A			
3.1.107	Proposed New First Floor Plan	1:100	A0	A			
3.1.108	Proposed New Second Floor Plan	1:100	A0	A			
3.1.109	Proposed New Roof Plan	1:100	A0	A			
3.1.201	Proposed New Elevations	1:100	A0	A			
3.1.203	Proposed New Contextual Elevations	1:100	A0	A			
Distribution							
Client							
Planning Consultant							
Issued By: Nivesh Miriyala							
Dwg Series: I=Information, P=Planning, T=Tender, CT = contract, C=Construction, AI = Additional Information							
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