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Planning Department  
South Dublin County Council  
County Hall  
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12<sup>th</sup> September 2022

**Re: Response to request for Additional Information, Register Reference: SD22A/0107**

Dear Sir or Madam,

I refer to South Dublin County Council Decision Order No. 0725 requesting 3no. items of additional information in relation to the above-mentioned planning application; Register Reference: SD22A/0107. I wish to make the following response on behalf of my client; Glenaulin Nursing Home Holdings Ltd:

**Item 1**

*"The Applicant is requested to address the following deficiencies in the information and inaccuracies in the drawings provided:*

*(a) The information shown on the Site Layout Plan does not appear to accurately reflect the existing scenario on the ground, specifically the Site Layout Plan appears to show 4 No. car parking spaces in total and approximately 60 sq m of private amenity space associated with the existing dwelling surrounded by a 1.8m high concrete post and timber panel fence. However, it was observed during a site visit that there are approximately 8 No. spaces in total and no clearly demarcated private amenity space for the dwelling. There also appear to be a number of industrial sized bins located next to the generator in the north-western corner of the site, which are not shown on the Site Layout. The Applicant is requested to provide amended Site Layout drawings accurately showing original and proposed (existing) layout of the subject site.*

*(b) The Applicant is requested to confirm the private amenity space provision for the dwelling and ensure that it is clearly demonstrated on the amended Site Layout drawings.*

*(c) The Applicant is requested to provide clarification regarding the intended use of the shed structure, whether it is ancillary to the main residential use or whether it is associated with the adjacent nursing home use."*

## Response to Item 1

(a) Please refer to revised drawings P401 & P402 which have been amended to accurately represent the existing and proposed conditions on the subject site. 3 No. Site Layout plans are included on the accompanying drawings.

Drawing P402 contains 2 No. Site Layout Drawings as follows:

- An original site layout showing No. 6 Bettysford Terrace as a residential property, prior to carrying out of the works which are the subject of the current application.
- A site layout as it currently exists, having regard to the observations of the Council, as detailed at Item 1(a) above.

Drawing P401 contains 1 No. Site Layout Drawing as follows:

- A proposed site layout showing the intended allocation of a 60sq.m residential amenity space and consequent reduction in the extent of carparking.

These amended drawings are intended to address the discrepancies in the drawings originally submitted.

(b) In order to comply with the standards of amenity space provision for a 3 bedroom house in accordance with Table 3.20 of the new South Dublin County Development Plan 2022-2028, it is intended to allocate 60 sq.m of private amenity space to the rear of the house for the benefit of the prospective residents. This space will be located entirely behind the front building line of the house and will be sufficient to ensure that residents enjoy a reasonable standard of private amenity.

This work has not yet been carried out, but will be completed following the granting of retention permission for the other items under consideration. These proposals are indicated on the 'As Proposed' site layout on drawing P401.

(c) The shed structure on site is ancillary to and associated with the running of the adjacent nursing home. It is primarily intended to provide contingency storage accommodation for emergency type situations affecting the nursing home and is currently being used for the storage of Personal Protective Equipment and related items.

## Item 2

*"Having regard to the industrial generator located in the north-western corner of the subject site, the Applicant is requested to provide an Acoustic Assessment which must be undertaken by a suitably qualified acoustic consultant describing and assessing the impact of noise emissions from the generator, to include the accumulative noise impact from existing on-site activities. The investigation must include, but not be necessarily limited to, the following:*

*(a) The identification of any neighbouring noise sensitive receivers who may be potentially impacted by the proposal*

*(b) The purpose and operating hours of the generator and the likelihood that it could give rise to a public nuisance for the neighbouring noise sensitive receivers.*

*(c) Distances between the generator and the nearest noise sensitive receiver and the predicted level of noise (L<sub>Aeq</sub>, 15min) from any activities when assessed at the boundary of that receiver.*

*(d) An assessment of the existing background (LA<sub>90</sub>,15 min) and ambient (L<sub>Aeq</sub>,15 Min) acoustic environment at the receiver locations representative of the time periods that any noise impacts may occur. NOTE: For the purposes of the assessment background noise includes; noise of the surrounding environment excluding all noise sources currently located on-site.*

*(e) A statement outlining any recommended acoustic control measures that should be incorporated to ensure the use of the generator will not create adverse noise impacts on the occupiers of any neighbouring noise sensitive properties."*

## **Response to Item 2**

As part of our response to the above items we suggest that clarification of the operational role of the generator in the context of the workings of the nursing home is critical in addressing any concerns relating to the impact of potential noise emissions.

The generator is required exclusively for stand-by purposes, to be used only in the event of an emergency where mains electricity supply would be cut off to the main nursing home, and is vital to ensure resident safety in the event of a power outage. It is not intended ever to be used in parallel with the normal power supply. Lexington House Nursing Home has been operational since December 2020. During that time the back-up generator has not had to be called into use.

As part of the maintenance regime of the nursing home, the generator is tested once a week to ensure that it will function as intended in the event of a power outage. During these tests, which are carried out during daytime hours, the generator is allowed to run for 30 seconds. Outside of power outages, scheduled maintenance is the only other time that the generator runs.

In relation to the location of the generator, during the course of construction of the nursing home several alternative locations were considered. The basement level plant room was considered, however this was ruled out due to space limitations inside the basement. Maintenance access of 1.0m is required to each side of the generator. This equates to a required space of 5.5m x 3.3m, or 18 sq.m of floor area, which imposed considerable constraints when choosing a suitable location inside the building.

An external location adjacent to the ESB substation, behind the library was also briefly considered. However this location was deemed not to be suitable for several reasons, including its close proximity to the library plus the need to maintain unimpeded access to the ESB substation and switch room. During the course of construction of the nursing home our client acquired the house at No. 6 Bettysford Terrace. This afforded the opportunity to locate the generator in a discreet location outside the nursing home, remote from any existing buildings and away from the library.

The generator itself is housed within a factory fitted sound attenuated enclosure which limits its sound output to 68dB at a distance of 7m. This will significantly mitigate against any noise impact arising from the generator on the very rare occasions when in an emergency situation it will have to be used. The nearest noise sensitive receiver is in excess of 20m away. Directly adjacent fencing and planting will also have a dampening effect, reducing the sound levels further. We enclose a data sheet for the generator which provides details of the acoustic pressure levels.

Having regard to the points outlined above, and in particular the intended purposes of the generator and its occasional use only in the circumstances of an emergency, we would submit that it would be overly onerous to request that a full acoustic assessment be carried out. We hope that the above clarification of the operational role of the generator will be sufficient to allay any concerns relating to potential noise emissions and will be sufficient to address this item of additional information.

### **Item 3**

*"The Applicant is requested to submit a revised drawing showing the following information:*

*(a) If a section of wall was to be removed.*

*(b) Proposed carpark spaces numbered and dimensioned.*

*(c) Proposed access/egress to rear garden carpark with clear dimensions.*

*(d) AutoTRAK analysis of how vehicles would access and egress the proposed rear garden carpark from the adjacent site (SD17A/0007 - Nursing home).*

*(e) Distance between main nursing home building and sub-station; and all similar and relevant dimensions."*

### **Response to Item 3**

(a) The original boundary wall between the rear of 6 Bettysford Terrace and the nursing home site was removed following our clients purchase of the house. The original location of this wall is indicated on the accompanying drawing P402. The application site boundary follows the line of that original wall.

(b) Please refer to the accompanying drawing P403 which shows the number and size of the proposed car parking spaces. This shows the intended parking layout following the allocation of the 60msq amenity space and consequent reduction in the number of parking spaces.

(c) Please refer to accompanying drawing P403 for clarification of dimensions at the access and egress point between the sites.

(d) Please refer to accompanying drawing P403 for swept path analysis of the proposed site showing vehicle access and egress to and from the site as well as proposed parking manoeuvres. As this analysis demonstrates, there is sufficient space to access and safely manoeuvre a passenger vehicle within the overflow carpark.

(e) Please refer to accompanying drawing P403 for clarification of all critical dimensions at the access and egress point to the site.

### **Conclusion**

The House at No. 6 Bettysford Terrace plays a hugely important role in the provision of staff accommodation, which has become a critical issue in the recruitment and retention of quality staff, particularly those from overseas, who's services are essential for the continued operation

of the nursing home as a centre of excellence for the care of older persons within the community.

The additional parking spaces provide overflow capacity during peak times, for example during weekend visiting hours when staff levels are highest and the availability of parking on-site can become very limited.

This submission, along with the enclosures mentioned, comprises the Additional Information being presented to South Dublin County Council in response to the request issued on 08<sup>th</sup> June 2022. We are confident that it addresses the concerns of the Council as articulated in its request and provides all information necessary to allay these concerns. If, however, there are items on which you require clarification, please do not hesitate to contact us.

The following drawings accompany this submission:

- 6 No. copies drawing P401 Proposed Plans, Elev's, Sect's & Site Layout
- 6 No. copies drawing P402 Original & As-built Site Layout Plans
- 6 No. copies drawing P403 Autotrack Analysis & Site Dimensions
- 1 No. copy of generator data sheet

Yours Sincerely,



Owen Murphy  
for CQA Design & Build