

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

**CLARIFICATION OF ADDITIONAL
INFORMATION Reg. Ref. SD22A/0126**

16th September 2022

Re: **CLARIFICATION OF 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 Clarification of Additional Information request from South Dublin County Council, dated 12th August 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 Housing Quality Assessment by CDP Architecture;**
- **Revised Issue Sheet as prepared by CDP Architecture;**
- **Revised Drawings as prepared by CDP Architecture;**
- **Revised Daylight + Sunlight Analysis Report as prepared by CDP Architecture;**
- **Report as prepared by PUNCH Consulting Engineers;**
- **Drawings as prepared by PUNCH Consulting Engineers;**

Clarification of Additional Information Request Item 1 –

Operational Waste Management.

In relation to Item 8(b) of the request for additional information, the applicant has proposed that bins will be collected at street level having been transferred from basement level bin stores. The development will provide for a wide public footpath at Loreto Terrace and so the collection at street level is not unacceptable in principle; however, it is unclear how bins are to be transferred there as the only path from basement level bin stores to the street is via the vehicular access ramp, which turns a blind corner.

(A) The Roads Department has requested that the following information is clarified:

- *confirm bin sizes (shown as 1100 litres capacity in drawings)*
- *clarify how refuse bins will be brought from both bin lobbies to the street (via basement exit ramp or by lift)*

If exit ramp option:

- *provide a method statement and risk assessment*
- *state the number of operatives required to bring each bin from lobby to street*
- *provide an explanation as to how bins would be moved if ice had formed on the ramp in winter time.*

(B) The applicant may comment on if direct collection from the basement has been considered and if so, why street level collection was considered to be favourable.

Response:

Please refer to the report prepared by PUNCH Consulting Engineers; Document Number 212215-PUNCH-XX-XX-RP-C-0003.

Also, refer to drawing no. 212215-PUNCH-XX-XX-DR-C-0611 and drawing no. 212215-PUNCH-XX-XX-DR-C-0612 in response to Item 1 of Clarification of Further Information request.

Clarification of Additional Information Request Item 2 –

Single Aspect, North Facing Units.

The development is proposed on the site of a permitted development; utilising newer apartment standards, the proposed development will achieve a higher density on the site. In this context, it is particularly important to establish that the proposed dwellings will meet those other standards contained in the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020) relating to single-aspect units. Units 2, 14 and 27 should be reconsidered, reconfigured or integrated with adjoining units to avoid having single aspect north-facing units in this development – in particular at ground level under overhanging features.

Response:

Please see revised Housing Quality Assessment of the proposed development which provides evidence that the proposed dwellings will meet the newer apartment standards contained in the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020).

Units 2, 14, and 26 have been reconsidered and integrated to provide dual-aspect units. Thereby, omitting 1 No. unit to provide a total of **37 dual-aspect units**. Moreover, the balcony of unit 14 at first floor level and balcony of unit 27 at second floor level has been repositioned to avoid unit 2 at ground floor level to be under an overhang, thereby, improving the internal light levels of this unit.

Clarification of Additional Information Request Item 2 –

Lighting.

There are a number of issues with the Sunlight and Daylight Assessment report.

- The 3D model referred to in the report is not shown, and it is not clear that balconies / overhangs have been taken into account in all assessments.

- Reference image 8 does not appear to back up the claim that each room assessed on the ground floor meets BRE requirements for a 'no sky line'; however no legend is provided with the image.

- The assessment submitted does not assess the development against the BS EN 17037 standard as it relates to internal light levels.

- ADF calculations are rounded to the nearest whole percentage, i.e. 1% or 2%. This allows for measures to be up to 50% short of the minimum target standard while still presenting as meeting the standard. More accurate figures should be provided.

The development is proposed on the site of a granted development; utilising newer apartment standards, the proposed development will achieve a higher density on the site. In this context, it is particularly important to establish that the proposed dwellings will meet modern industry standards. Such standards should inform design and there should be transparency in how reports have arrived at their conclusions.

A revised Sunlight and Daylight Assessment should be provided to resolve the above issues and this should be provided as clarification of additional information.

Response:

Please see revised Daylight and Sunlight Assessment prepared by CDP Architecture.

The revised design of the proposed development including floor plans, elevations and sections were utilised in preparing the revised Daylight and Sunlight Assessment Report.

The revised report includes the images of the 3D model used to conduct the simulations for the assessment. These images clearly show that the balconies / overhangs have been taken into account for the assessment.

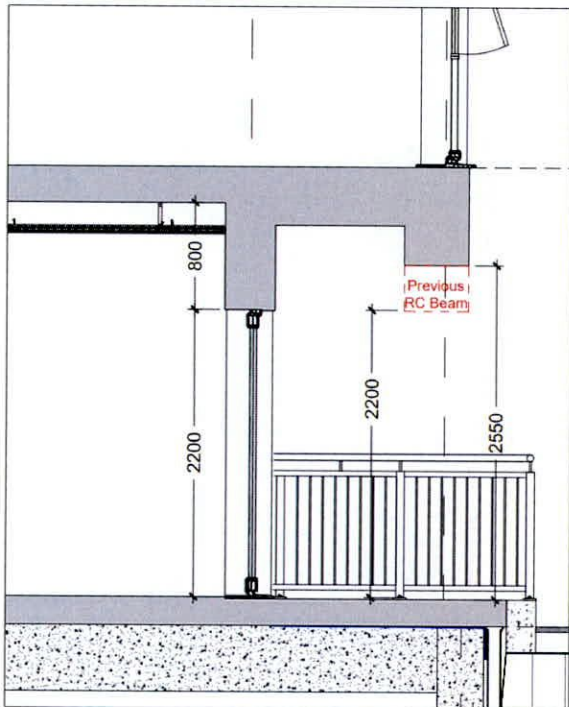
A legend indicating the range of acceptable internal light levels has been provided for 'no sky line' assessment against BRE guidelines.

The revised report clearly assesses the proposed development against the BS EN 17037 standard. This has been done by assessing the levels of illuminance in all units of concern using Spatial Daylight Autonomy (sDA) and Daylighting Illuminance.

More accurate figures of the ADF calculations have been provided. Please see Table 1, Table 2, Table 3 and Appendix A of the sunlight and daylight analysis report as prepared by CDP architecture.

The revised Daylight and Sunlight Assessment Report clearly establishes that the units of concern at ground floor level under the overhang at first floor level and units that have been reconfigured or integrated meet the modern industry standards.

Care has been taken when redesigning the units to improve the daylight and internal light levels of units at ground floor level. For instance, the balcony of unit 14 at first floor level and balcony of unit 27 at second floor level has been repositioned to avoid unit 2 at ground floor level to be under an overhang. In addition, the edge beam of the overhang at first floor level has been reduced to allow for increased sunlight and daylight along with improved sky exposure to the ground floor units. Please see image below.



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 Clarification of Additional Information submission.

Yours Sincerely,



Paul Moran
Director CDP Architecture