Our Case Number: ABP-314880-22

Planning Authority Reference Number: SD22A/0039



South Dublin County Council Planning Department County Hall Tallaght Dublin 24 Land Use Planning & Transportation

2 6 OCT 2022

South Dublin County Cour.cil

Date: 25 October 2022

Re: Demolition of 2 habitable structures and a row of 5 derelict structures, the construction of 22 houses, car parking spaces, vehicular and pedestiran access and associated site works.

Silveracre Bungalow, Whitechurch Road, Rathfarnham, Dublin 14.

Dear Sir / Madam,

Enclosed is a copy of two appeal under the Planning and Development Act, 2000, (as amended).

Submissions of documents etc., to the Board. N.B. Copies of I-plans are not adequate, all drawings and maps should be to scale in accordance with the provisions of the permission regulations.

- 1. The planning authority is required to forward specified documents to the Board under the provisions of section 128 and section 37(1)(b) of the Planning and Development Act, 2000, (as amended). Please forward, within a period of 2 weeks beginning on the date of this letter, the following documents:-
- (i) a copy of the planning application made to the planning authority and a copy of any drawings, maps (including ordnance survey number) particulars, evidence, a copy of any environmental impact statement, other written study or further information received or obtained by your authority in accordance with regulations under the Acts. If practicable, the original of any drawing with coloured markings should be provided or a coloured copy,
- (ii) a copy of any technical or other reports prepared by or for the planning authority in relation to the application,
- (iii) a certified copy of the relevant Manager's Order giving the decision of the planning authority,
- (iv) a copy of the notification of decision given to the applicant,
- (v) particulars of the applicant's interest in the land or structure, as supplied to the planning authority,
- (vi) a copy of the published notice and a copy of the text of the site notice erected on the land or structure.

Teil Glao Áitiúil Facs Láithreán Gréasáin Ríomhphost Tel LoCall Fax Website Email

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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902 64 Marlborough Street Dublin 1 D01 V902

- (vii) a copy of requests (if any) to the applicant for further information relating to the application under appeal together with copies of reply and documents (if any) submitted in response to such requests,
- (viii) a copy of any written submissions or observations concerning the proposed development made to the planning authority,
- (ix) a copy of any notices to prescribed bodies/other authorities and any responses to same,
- (x) a copy of any exemption application/certificate within Part V of the 2000 Act, (as amended), applies,
- (xi) a copy of the minutes of any pre-planning meetings.
- 2. To ensure that the Board has a full and complete set of the material specified above and that it may proceed with full consideration of the appeal, please certify that the planning authority holds no further material relevant to the case coming within the above list of items by signing the certification on page 3 of this letter and returning the letter to the Board.
- 3. In addition to the documents mentioned above, please supply the following:- Particulars and relevant documents relating to previous decisions affecting the same site or relating to applications for similar development in near proximity. "History" documents should include;
- a) Certified Manager's Order,
- b) the site location, site layout maps, all plans and
- c) particulars and all internal reports.
- d) details of any extensions of time given in respect of previous decisions.

Copies of I-plan sheets are not adequate.

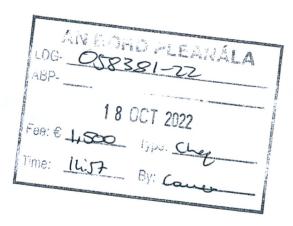
Where your records show that a decision was appealed to the Board, it would be helpful if you would indicate the Board's reference.

Submissions or observations by the planning authority.

4. As a party to the appeal you may, under section 129 of the 2000 Act, (as amended), make submissions or observations in writing to the Board in relation to the appeal within a **period of 4 weeks beginning** on the date of this letter. Any submissions or observations received by the Board outside of that period shall not be considered, and where none have been validly received, the Board may determine the appeal without further notice to you.

Contingency Submission

5. If the decision of your authority was to refuse permission, you should consider whether the authority wishes to make a contingency submission to the Board as regards appropriate conditions which, in its view, should be attached to a grant of permission should the Board decide to make such a grant. In particular, your authority may wish to comment on appropriate conditions which might be attached to a permission in accordance with section 48 and/or 49 of the 2000 Planning Act (Development / Supplementary Development Contributions) including any special condition which might be appropriate



Brock McClure

> 63 York Road Dun Laoghaire Co. Dublin

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The Secretary
An Bord Pleanala
64 Marlborough Street
Dublin 1
Do1 V902

18th October 2022

First Party Appeal against Conditions attached by South Dublin County Council on the grant of permission for development at:

Silveracre Bungalow (D14 W2K8), No. 6 Whitechurch Road (D14 X9W9) and 5no. Derelict Cottages at Whitechurch Road, Rathfarnham Dublin 14

South Dublin County Council Application Reg. Ref. SD22A/0039

Dear Sir/Madam,

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, (Agent) have been instructed by our client (the First Party), Dungrey Limited 70 Sir John Rogerson's Quay, Dublin 2 to lodge this first party appeal against 2 no. of the conditions attached to South Dublin County Council's grant of permission for the proposed development at Silveracre Bungalow (D14 W2K8), No. 6 Whitechurch Road (D14 X9W9) and 5no. Derelict Cottages at Whitechurch Road, Rathfarnham Dublin 14 (SDCC Reg. Ref. SD22A/0039).

The proposed development (South Dublin County Council Register Reference SD22A/0039) provided for permission (in summary) as follows:

"(a) The demolition of two existing habitable structures on site including a bungalow (Silveracre), an existing cottage (No. 6 Whitechurch Road) and a row of 5 derelict structures/cottages located along the western boundary of the site (extent of proposed demolition is 433sq.m) (b) the construction of 22 4 bed, 3-4 storey units ranging in size from 197sq.m to 214sq.m, all with associated private balcony/terrace areas. Vehicular and pedestrian access is proposed via new entrance on Whitechurch Road. The proposed development shall provide for 44 car parking spaces, a new single storey bicycle storage shed (approx 34sq.m) and provision of bin storage to be provided at the front curtilage of the dwelling for all terraced units, all boundary treatment, all site services and all associated site works."

On 21st of September 2022 after a receipt of Further Information, South Dublin County Council issued a decision to grant permission for the proposed development subject to 23 no. of conditions. The First Party in the case is appealing conditions no. 2 (a) and (b) and no. 10 (d) of the grant of permission which are as follows:

- Condition 2 "Amendments. Prior to the commencement of development the applicant, owner
 or developer shall submit for the written agreement of the Planning Authority, following
 consultation with SDCC's Architectural Conservation Officer if needed, revised plans that
 incorporate all of the following amendments:
 - (a) The south-eastern corner of the site reconfigured so that Unit o8 omitted and the bicycle storage building is moved to be setback at least 3 metres from the existing surface water pipe along the eastern boundary of the site.
 - (b) Units 02, 03, 04 and 21 reduced to 2-3 storeys in height, the same height as Units 01 and 22 as revised via additional information. Units 22 and 21 and Units 01 to 04 shall be fully redesigned to improve the form and design (especially at roof level) to provide for an overall coherently designed scheme and improved frontage onto Whitechurch Road.
- Condition 10 (d)- "Landscape Design Proposals Prior to the commencement of development the
 applicant/developer shall submit, for the written agreement of the Planning Authority, following
 consultation with SDCC's Public Realm Section if needed, a fully detailed landscape plan with full
 works specification, that accords with the specifications and requirements of the Council's Public
 Realm Section. This shall include the following:
 - (d) Unless otherwise agreed in writing, the proposed attenuation tank shall not be located under the main open space for the proposed development. The proposed attenuation tank should be relocated and reduced in size through the provision of additional natural SUDS features as part of the storm/surface water drainage scheme for the proposed development."

For the avoidance of doubt the applicant does not seek to appeal the Granting of Permission.

As part of this First Party Appeal, please find enclosed

No	Items	Consultant	No. of Copie:	Copy/Original
1	First Party Appeal Report	Brock McClure	2	Сору
2	Architect Drawings	BBA Architecture	2	Сору
3	Engineering Note/Memo	POGA	2	Copy
4	Appeal Fee: Cheque of €1500.00	Brock McClure	1	Original

Formal details of the development description and additional appeal details are included in the enclosed documentation.

We confirm that we act for **Dungrey Limited** and request that all future correspondence in relation to this matter be directed to this office. If you have any queries in relation to this matter, please contact me directly.

Yours sincerely,

Lavra buch

Laura Brock
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FIRST PARTY APPEAL

Residential Development

Silveracre Bungalow (D14 W2K8),
No. 6 Whitechurch Road (D14 X9W9)
and 5no. Derelict Cottages
at Whitechurch Road,
Rathfarnham
Dublin 14

On behalf of

Dungrey Limited

SDCC Ref: SD22A/0039

October 2022



Planning & Development
Consultants
63 York Road
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Table of Contents

1	Ex	ecutive Summary
2		roduction
3		e Context
	3.1	Subject Site
	3.2	Surrounding Context
	3.3	Planning Context
4	Pla	nning Application Lodged
	4.1	Summary of Proposed Development
5	Fu	rther Information Request
6	Pla	nning Authority Decision1
	6.1	Conditions1
	6.2	Planning Authority Assessment
	6.3	Planner's Report1
7	Gr	ounds of Appeal1
	7.1	Condition No. 2 (a) and (b)
	7.2	Condition No. 10(d)
8	Alt	ernative Design Option for Approval2
	8.1	Proposed Development2
a	Co	nclusion



1 Executive Summary

GENERAL COMMENTARY

The site subject of this appeal is approximately 0.58 hectares and consists of a largely green field site with a single storey detached dwelling and associated ancillary structures. There are semi-demolished structures (5no. derelict cottages) present on site.

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 will connect Rathfarnham to Dublin City Centre via Terenure and Rathmines.

This site is located in a mature residential area with industrial and school buildings along the northern boundary.

The proposal complies with all relevant national, regional and local policy in relation to housing provision and complies with the statutory Development Plan.

South Dublin County Council have granted permission for the proposal subject to condition which, in our professional opinion are unwarranted. These conditions are the subject of this First Party Appeal.

SUBJECT PROPOSAL

The extent of residential development proposed comprises 22 no. 4 - Bed semi detached and Terrace Units (3-4 storeys) with proposed gross floor areas ranging from 197 - 214 sq m.

All existing and proposed levels of residential amenity are both protected and delivered with appropriate separation distances, access to daylight, private open space and communal open space delivered. The design of the houses incorporates access to the roof level in order to provide adequate private open space to the residents while achieving an appropriate residential option for the site. This has been confirmed by the Planning Authority in their assessment of the scheme. We are confident that the proposed density is acceptable in this instance.

The residential density of the site equates to 37.8 units per hectare with a plot ratio of 0.78 $(4517.5m^2 / 5820m^2)$ and a site coverage of 32% $(1873m^2 / 5820m^2)$.

The subject proposal offers an opportunity to provide much needed housing for families in an established safe mature residential setting close to services and amenities in Rathfarnham village with schools located within walking distance from the site.

APPEAL STRATEGY

The purpose of this First Party Appeal against conditions, is to defend and stand over the scheme as lodged with South Dublin County Council and subsequently amended by way of Further Information. We invite An Bord Pleanála to review the scheme, *de novo*, and grant permission for the scheme as originally lodged and/or as amended by Further Information.

MODIFIED SCHEME

We also wish to submit a new development option or modified scheme to An Bord Pleanála for consideration as part of this appeal. The height and scale of the development proposal has been reconsidered by way of this modified scheme. It is our view that this revised development option addresses the concerns raised by South Dublin County Council in the event that An Bord Pleanála are not convinced of the merits of the scheme as lodged or amended at Further Information stage. This modified scheme is set out in Section 8.



2 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, are instructed by our client **Dungrey Limited 70, Sir John Rogerson's Quay, Dublin 2** to lodge this first Party Appeal to An Bord Pleanála against conditions attached to the decision of South Dublin County Council on the 21st of September 2022 for the development proposed in this case. South Dublin County Council Register Reference SD22A/0039 refers.

This appeal has been prepared by Brock McClure Planning and Development Consultants, with inputs from:

- BBA Architecture
- POGA Consulting Engineers

We confirm that prior to lodging this Appeal, we have reviewed the reports published by South Dublin County Council's Planning Department together with all departmental reports on the file (including reports from the Water Services Department, the Roads Department, the Parks Department, the Public Realm Section and the Architectural Conservation Officer).

In accordance with requirements, we enclose the statutory fee of €1,500.

2.1 Enclosures

We refer the Board to BBA Architecture drawings that are enclosed with this appeal. These drawings are included as a new development option or modified scheme for the consideration of An Bord Pleanála as part of this appeal.

We also enclose a note from POGA engineering that outlines the details relating to the surface water pipe located to the east of the site in addition there is a note relating to the discussion on the surface water attenuation tank that occurred with South Dublin County Council.

3 Site Context

3.1 Subject Site

The site subject of this appeal extends to approximately 5,801 sqm or 0.58 ha in size and consists of a largely green field site with a single storey detached dwelling and associated ancillary structure on site. There are semi-demolished structures (5no. derelict cottages) along the front boundary of the site, fronting onto Whitechurch Road.

The site includes 2 properties referred to as 'Silveracre Bungalow' (D14 W2K8) and No. 6 Whitechurch Road (D14 X9Y9).



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

3.2 Surrounding Context

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.



The South Dublin County Council Development Plan 2022-2028 came into effect on the 3rd of August 2022 and is the relevant statutory plan governing the subject site.

3.3.1 Zoning

Under the South Dublin County Development Plan 2022-2028 the site is zoned Objective RES which has the objective "To protect and/or improve residential amenity".



Figure 2 - Zoning Map showing approx. subject site outlined in red [Source: SDCC Development Plan 2022-2028 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." [BMC Emphasis]

Residential development as is currently proposed is therefore permitted in principle at this site.

3.3.2 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).

The following policies are relavant under the current development plan in relation to the ACA and protected structure:

Policy NCBH20: Architectural Conservation Areas, 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."

Policy NCBH19: Protected Structures it is 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."

The above considered, any forthcoming proposal will have to consider the impact it may have on the character and setting of the Protected Structure to the south of the site (The Mill House Ref. 258). At the outset of this appeal, it it important to set out that we consider the subject proposal to be sufficiently removed from this Protected Structure in that the development proposal is not considered to not have any impact on existing heritage values.

An Bord Pleanala will be aware that the findings of the Architecture Heritage and Conservation Impact Assessment by Slattery Conservation Architects submitted at application stage identified the following:

The proposed development will have minimal impact on

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

The following excerpt from page 37 of the the Conservation Impact Assessment report is identified below:

"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.



4 Planning Application Lodged

It is important to set out that there has been a detailed design process associated with this site and the current proposal. It is submitted that the applicant addressed any initial concerns raised by the Planning Authority at pre-planning stage by way of the application lodged and all matters raised in the Further Information Request subsequently issued by way of the revised development option lodged at Further Information stage.

For the convenience of the Board, we have summarised the proposed development below.

However, in considering the case *de novo*, the Board may wish to refer to the full details of the application contained within the application lodged to South Dublin County Council on the 10th of February 2022.

4.1 Summary of Proposed Development

The proposed development lodged to South Dublin County Council consisted of the following:

- The demolition of two existing habitable structures on site including a bungalow (Silveracre), an existing cottage (No. 6 Whitechurch Road) and 5no. derelict structures/ cottages located along the western boundary of the site, the extent of proposed demolition is 433 sq.m
- 2. The construction of 22 no. 4 bed 4 storey units ranging in size from 197 sq m to 214 sq m, all with associated private balcony/terrace areas.
- 3. Vehicular and pedestrian access is proposed via a new entrance on Whitechurch Road.
- 4. The proposed development shall provide for 44 no. car parking spaces, a new single-storey bicycle storage shed (approx. 34sq.m) and provision of bin storage to be provided at the front curtilage of the dwelling for all terraced units, all boundary treatment, all site services and all associated site development and landscaping works.

The proposed site layout as originally lodged with the Planning Authority is shown below for the convenience of An Bord Pleanála.



Figure 3 - Proposed Site Layout [Source BBA Architecture]



5 Further Information Request

In review of the file, South Dublin County Council issued a request for Further Information, which in turn allowed the design team to consider any concerns raised by the Planning Authority and amend the scheme as required. As stated previously, the applicant has made every effort to design a scheme, that at all times, reacts positively to the comments of the Council.

We welcomed the general acceptance by South Dublin County Council of the scheme lodged. The properties were originally designed to be 3 storey properties with an additional level providing access for residents to the roof terrace. However, having reviewed the Further Information Request, the design team opted to redesign the roof level of proposed dwellings 1-4, which in turn reduced the visual impact and the overall mass of the building at roof level. The result presents a traditional pitched roof with the roof cladded in black tile/slate materials, assimilating into the overall development successfully.

The figures below illustrate the design changes made to house Nos. 1-4 at Further Information stage.





Figure 4 – Changes made to proposed front/ north facing elevation to Houses 1-4 [Source BBA Architecture]

At roof level the design change has set back the previously vertical roof line from the gable face of the buildings and applied a 9-degree angle to the roof walls. The same angle was also applied to the area of the roof which faces the front of the houses.

The glazed patio doors/ windows which provided access to the private amenity space at roof level have been removed, the one access door that remains will be cladded in the same material as the proposed roof finish in such a way that it blends with the overall roof surface.

Evidently, Unit no. 1 and 22 were revised to two storeys in height with access to roof level. The front entrances for unit no. 1 and 22 have been relocated to the western elevation with a low level boundary wall provided as a privacy strip from Whitechurch Road.

The design team also made amendments to the scheme to include a review of the overall height of the scheme and how it presents onto Whitechurch Road. The scheme introduced active side elevations providing for increased passive surveillance; updates to the overall palette of finishes across the scheme along with parking; revisions to private open space; and landscape modifications.

The figures below illustrate the modifications that were made to the end of the terraces adjacent to Whitechurch Road which sees the overall development address the road in a much more positive manner, reflective of the character of the road and the ACA.

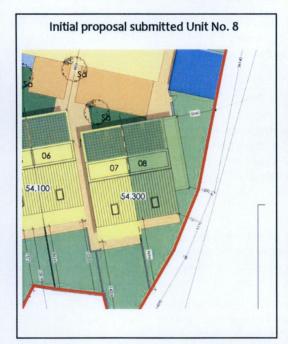




Figure 5 - Changes made at further information stage to units 1 and 22 addressing Whitechurch road

5

Changes were also made to the layout of house no. 8 and its associated private open space in order to provide adequate private amenity space to the rear of the dwelling. This was achieved by reducing the depth of the house by 1.4m which was compensated by a redesign of the eastern element enabling the garden to be located to the rear of the house as illustrated below.



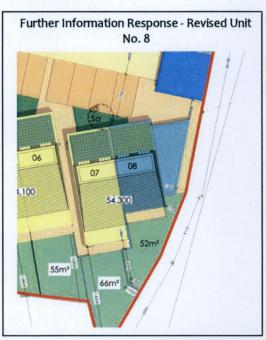


Figure 6 - Site Layout extract showing changes made to unit no. 8 [Source BBA architecture Annotated by BMC]



6 Planning Authority Decision

Following the receipt of the further information response pack submitted by the design team to South Dublin County Council, a decision was made to grant permission for the development on the 21st of September 2022, subject to 23 no. conditions.

As stated at the outset of this appeal, the design team is of the view that the scheme as lodged with the Planning Authority and amended at Further Information stage stands up to scrutiny and therefore we would ask the Board to consider the proposal de novo.

6.1 Conditions

In the first instance, we note that the applicant welcomes the decision of South Dublin County Council to grant permission for the scheme. However, the applicant wishes to submit this first party appeal against condition 2 (a) and (b) and 10 (d) of the 23 no. conditions attached to the grant of permission. These conditions are inserted in full below for the purpose of this appeal:

Condition No. 2 - Amendments

"Prior to the commencement of development the applicant, owner or developer shall submit for the written agreement of the Planning Authority, following consultation with SDCC's Architectural Conservation Officer if needed, revised plans that incorporate all of the following amendments:

- (a) The south-eastern corner of the site reconfigured so that Unit o8 omitted and the bicycle storage building is moved to be setback at least 3 metres from the existing surface water pipe along the eastern boundary of the site.
- (b) Units 02, 03, 04 and 21 reduced to 2-3 storeys in height, the same height as Units 01 and 22 as revised via additional information. Units 22 and 21 and Units 01 to 04 shall be fully redesigned to improve the form and design (especially at roof level) to provide for an overall coherently designed scheme and improved frontage onto Whitechurch Road."

Condition No. 10 (d) - Attenuation Tank

"(d) Unless otherwise agreed in writing, the proposed attenuation tank shall not be located under the main open space for the proposed development. The proposed attenuation tank should be relocated and reduced in size through the provision of additional natural SUDS features as part of the storm/surface water drainage scheme for the proposed development."

The Grounds of appeal for each of the above conditions no. 2 and 10 are outlined in section 7 of this report.

6.2 Planning Authority Assessment

To provide An Bord Pleanála with all information necessary for a thorough assessment of the proposal and the conditions attached we now provide a brief review of the Planning Report and various departmental reports associated with this decision. Where we felt it necessary to submit additional information to provide the Board with information for their further analysis, we have done so. This additional information is noted in section 6.3.1 below.

Whilst the purpose and rationale for this appeal is to defend and stand over the scheme as lodged with the Planning Authority, we also wish to submit an alternative scheme to the board which addresses and responds to all comments raised within the Planner's Report. Details on the revised scheme is provided in section 8 of this report.



6.3 Planner's Report

For the convenience of the Board, we have undertaken a review of the decision of South Dublin County Council. Following an assessment of the Further Information Response lodged, the Planner's Report recommended a grant of permission for the proposed development. Whilst this is a positive step towards delivering houses in the area the conditions attached that are subject of this appeal are unwarrented making the scheme unviable if these conditions were to be fulfilled.

It is worth noting at this point that South Dublin County Council supported a number of the main elements of the proposal. The following commentary is identified:

Housing Mix

The Planner noted that the proposal of 4 or 5 bed houses was acceptable and complies with the objective relating to dwelling mix H1 Objective 12 in the South Dublin County Council Development Plan 2022-2028.

Materials and Finishes

In summary the Architectural Conservation Officer noted the following improvements in relation to the revised scheme:

- The revisions and modifications made to the design, materials and finishes are much improved.
- The revisions made to the units addressing Whitechurch Road are a simpler more contemporary design confirming this is an improved scale within the existing streetscape.

Transport and access

 The Roads Department were satisfied with the additional information submitted and recommended that permission should be granted subject to a Mobility Management Plan and a Public Lighting Scheme

Public Open Space

The Planners report notes that there is adequate provision of public open space provided for the residents of the development that meets the minimum standard of 10% of the site. The proposal provides for approximately 580sq.m of public open space which is 10% of the total site area.

6.3.1 Response to South Dublin County Councils Assessment of Additional Information Further Information Item No. 1 - Visual Impact, Height, Form and Design

In summary the Planning Authority requested the following at Further Information stage:

- A reduction in the height of the proposed dwellings to a maximum of 3 storeys,
- Reconfiguration of unit no. 1 and 22 to provide a frontage/ entrance onto Whitechurch Road. Revisions to the boundary treatment to unit no. 1 and 22 to provide a privacy strip.
- Revisions to the boundary treatment along these units and to the materials and finishes particularly across the rear elevations were also sought.

The design team discussed reducing the height of the proposed dwellings to 3 storeys and decided that this would not be feasible as it would reflect an unsustainable and inappropriate form of development resulting in a reduced plot ratio.

We can confirm that changes were made to unit no. 1 and 22 by reducing the overall height to 2 storeys with access to a terrace at roof level creating an entrance onto Whitechurch Road. Revisions were made to the boundary treatment incorporating a privacy strip.

The Architectural Conservation Officer was satisfied with the revisions made in relation to the design modifications and materials submitted in the Further Information response with the following positive commentary of note from that report:

"Modifications have been made to the end of the terraces adjacent to Whitechurch Road thereby addressing the Whitechurch Road and existing streetscape setting. A simpler more contemporary design has been presented, which presents an increased overall form and scale. The revisions made to the two units along the road provides an improved scale within the existing streetscape.

It is considered that with the revisions and modifications made along with considered design elements and more appropriate palette of materials and finishes the development is much improved. The design elements and proportions adopted in the proposed house type have been considered in relation to the adjacent Protected Structure, Mill House. The mirroring of fenestration of the Mill House, in addition to addressing the finished treatments proposed allows the revisions to reinforce the design rationale. The boundary feature along Whitechurch Road as detailed in the request for AI is now a low-level boundary wall cladded in stone, with railings above giving an improved boundary treatment at this location."

Evidently, the Architectural Conservation Officer also made a number of positive comments in relation to the redesign of the scheme only recommending conditions in relation to the materials and finishes.

However, the Planners Report still raises concerns in relation to the visual impact onto Whitechurch Road despite the effort the design team has made to address the concerns raised by South Dublin County Council. The following comments (From the Planners Report) in response to the Architectural Conservation Officer and the design modifications that were requested are included below for the convenience of the Board.

"The Planning Authority agrees that the changes have gone some way to addressing the concerns raised (i.e., materials and finishes, reduction in scale on Whitechurch Road). However, there are still concerns with the visual impact of the proposed development when viewed from Whitechurch Road.

While the units immediately fronting Whitechurch Road have been reduced to 3 storeys, the remainder of the houses would remain the same height as originally proposed, 3-4 storeys. The character along Whitechurch Road is typical of one or two storey housing. The reduction in scale, and provision of frontage onto Whitechurch Road, on the front houses is to be welcomed. The provision of 3 storeys for these front houses, 1-2 storeys above the typical height along this road, is considered acceptable given the variation of dwelling form and scale along this section of the road.



However, the revision to the front houses results in an immediate step up in a floor level to the attached houses behind. This creates an awkward form, especially due to the irregular roof form. The houses behind (Units 21, 02, 03 and 04) should be reduced in height to match Units 01 and 22. The proposed elevations along Whitechurch Road are also not in keeping with the remainder of the proposed development in terms of form, fenestration and design. Units 22 and 21 and Units 01 to 04 should be fully redesigned to improve the overall design of the scheme and frontage onto Whitechurch Road. This should be addressed via condition."[BMC Emphasis]

As will be stated in our Grounds of Appeal we can confirm that the removal of one storey from units 21, 2, 3 and 4 would render the scheme unviable and it is, in our view, unreasonable to omit a storey to these houses behind units 1 and 22 and we do intend to defend the scheme as lodged at Further Information stage as we are firmly convinced of its design merits.

The Planners Report notes that the provision of 1-2 storeys above the typical height along Whitechurch Road is considered acceptable. However, they are of the view that the modifications made by the design team to House Nos. 1 and 22, which addressed the concerns of the Planning Authority have resulted in an additional problem with the subsequent units. The image below illustrates the building line of the Houses Nos. 17-22 in addition we note the level change that occurs here. As stated above, we refute this conclusion and intend to appeal the conditions that are attached as a result of this assessment.



Figure 7 - Section of units 17-22 proposed at Further Information [Source BBA Architecture]



Further Information Item No. 2 & 3 - House No. 8 and setback distance to Piped Stream

The Planning Authority requested a revised layout for House No. 8 to increase the level of private amenity space provided for this unit.

As mentioned previously, the design team modified the overall layout of this unit and private open space area by reducing the depth of the dwelling by 1.4m. In addition, a revised eastern elevation has been delivered. These revisions have now delivered an increased area of private open space (8sq m) to deliver a garden of 52sqm at ground level. Additional private open space is delivered at roof level which was deemed appropriate by South County Dublin. The figure below compares the changes made for the convenience of the Board.





Figure 8 - Site Layout extract showing changes made to unit no. 8 [Source BBA architecture Annotated by BMC]

The Planners Report states the following in relation to the modifications to unit no. 8:

"While the changes to House No. 8 are noted, this house is insufficiently setback from the existing surface water pipe along the eastern boundary of the site. This southeastern area of the site should be revised so that the required separation distances are achieved. This includes the omission of this house and is discussed further under the following section of this report."

This issue has been addressed by Condition No. 2 in the Planning Authority's Decision as set out previously.

Please refer to our Grounds of Appeal against Condition No. 2 in Section 7.1.1 of this report where the position of the pipe has been ascertained on site and it has been confirmed that adequate setbacks with any proposed buildings within the existing scheme would be achieved.



7 Grounds of Appeal

From the outset of this appeal, we wish to set out that the applicant generally welcomes the decision in principle to grant permission for the proposal. However, it is our opinion that a number of the conditions attached to the decision issued by South Dublin County Council are unwarranted.

The specific conditions that are subject of this appeal are as follows:

- Condition 2 (a) and (b)
- Condition 10 (d)

These conditions relate to the removal of floors from several of the houses proposed and the size and location of the attenuation tank that is required for the proposed development.

The reasons for appealing these conditions are set out below. In addition, the design team have proposed revised design options for the consideration of An Bord Pleanála if the Board is unsatisfied with our grounds of appeal. The revised design option is set out in Section 8 of this appeal.

7.1 Condition No. 2 (a) and (b)

The applicant wholly refutes the attachment of Conditions 2 (a) and (b) as set out in the decision issued. The imposition of Condition No. 2(a) and (b) has a fundamental impact on the viability of the scheme, which we respectfully submit has not been fully considered by the Planning Authority.

The condition as attached to the permission issued reads as follows:

Condition No. 2

"Amendments.

Prior to the commencement of development the applicant, owner or developer shall submit for the written agreement of the Planning Authority, following consultation with SDCC's Architectural Conservation Officer if needed, revised plans that incorporate all of the following amendments:

- (a) The south-eastern corner of the site reconfigured so that Unit o8 omitted and the bicycle storage building is moved to be setback at least 3 metres from the existing surface water pipe along the eastern boundary of the site.
- (b) Units 02, 03, 04 and 21 reduced to 2-3 storeys in height, the same height as Units 01 and 22 as revised via additional information. Units 22 and 21 and Units 01 to 04 shall be fully redesigned to improve the form and design (especially at roof level) to provide for an overall coherently designed scheme and improved frontage onto Whitechurch Road.
- (c) A privacy screen provided on the north-north east side boundary of the roof terrace of Unit 16. Opaque glazing provided to any above ground floor windows on the north-north east elevation of Unit 16.

REASON: To protect the amenities of the area and in the interests of the proper planning and sustainable development of the area."

In the interest of clarity, the applicant will accept condition no. 2(c), which requires a privacy screen to be provided at the north-northeast side boundary of house no. 16 roof terrace



7.1.1 Grounds of Appeal against Condition 2(a)

Condition 2 (a):

The south-eastern corner of the site reconfigured so that Unit o8 omitted and the bicycle storage building is moved to be setback at least 3 metres from the existing surface water pipe along the eastern boundary of the site.

Adequate setback is provided from the Surface Water Pipe

We request that the board omit Condition 2(a) that is attached to the grant of permission. We are of the opinion that the Planner in this instance is uninformed of the location of the surface water pipe. Therefore, we respectfully submit the Council were not clear on the location of the surface water pipe when attaching this condition. This is clarified in the attached appeal documentation, which was also submitted at Further Information Stage.

For the purpose of the file, we wish to clarify that the position of the surface water pipe is located over 3m away from House No. 8 and the bike shed.

The works to relocate the surface water pipe were completed prior to a decision being made on the application but did not form part of this application documentation. The works were carried out under the supervision of the SDCC drainage department Ms Gabrielle McGee and Mr Colm Harte (SDCC Area Inspector) oversaw same.

Drawing 21029-102-P2 issued as part of the response to further information shows the location of the existing surface water pipe after the works were completed – a fact now confirmed by SDCC.

We refer the Planning Authority Drawing No. D-122-BP-SL-104 prepared by BBA Architecture which is illustrated in the extract below and provides details of the route of the surface water pipe along this strip of land illustrating a setback distance achieved of 3.5 m from the bicycle storage unit.

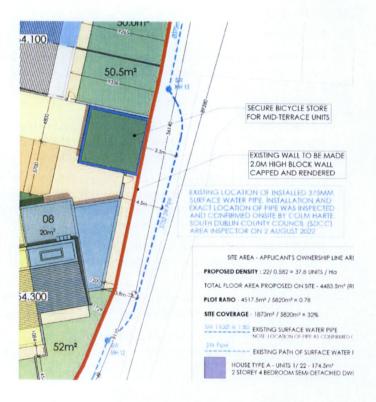


Figure 9 - Drawing no. D-122-BP-SL-104 illustrating adequate setback distance from any proposed structure on site [Source BBA Architects]



7.1.2 Ground of Appeal against Condition 2(b)

Condition 2(b):

(b) Units 02, 03, 04 and 21 reduced to 2-3 storeys in height, the same height as Units 01 and 22 as revised via additional information. Units 22 and 21 and Units 01 to 04 shall be fully redesigned to improve the form and design (especially at roof level) to provide for an overall coherently designed scheme and improved frontage onto Whitechurch Road.

The Proposed Development is Appropriate as Designed

We request that the board omit Condition 2(b) that is attached to the grant of permission specifically relating to unit nos. 2, 3, 4 and 21.

It is our respectful submission that the Planning Authority has not provided adequate justification for the need to omit a floor from unit nos. 2, 3, 4 and 21. The height of the scheme was considered appropriate by the Council's Conservation and Heritage Officer.

The Board will note from the file that this Department raised the initial concern regarding the relationship to the ACA and Whitechurch Road and subsequently has been satisfied with the information received at Further Information. We are disappointed that the Planning Officer did not endorse this recommendation.

Whilst the Planning Officer has confirmed that it may be appropriate to seek a redesign of these units through a separate planning application, this appeal puts forward an option for the consideration of An Bord Pleanala. We do however, ask the Board to consider the proposal as lodged at FI stage.

The scheme complies with all relevant metrics for development at this location in addition to the design team making a substantial effort and modifications at all stages of the planning process to address the concerns of South Dublin County Council. We consider that the Planning Authority has vastly overstated the case in their conclusion that the revised proposal put forward at Further Information stage would have a visual impact on Whitechurch Road.

The scheme designed provides the required quantity of public and private open space whilst achieving a suitable density for the area that fits into the existing context.

It is our professional opinion that the height of the houses at a maximum 3 storeys with access to a terrace at roof level is entirely appropriate for the site. In addition to the proposed landscaping treatment and existing screening by the mature trees and hedgerow to the eastern boundary of Willbrook grove along the western side of Whitechurch Road will mitigate the impact on private amenity and presents an opportunity to provide much needed housing at this vacant site.

We can confirm that the proposal has been designed sensitively and does not result in any material negative impact on neighbouring residential properties as can be seen in the material submitted over the course of this application.

The figure below displays the section view from Whitechurch road of the proposal at Further Information stage prepared by BBA architecture



Figure 10 - Proposed Section 1:1 illustrating the revised scheme and how it addresses Whitechurch Road

[Source BBA Architecture]



Critical Need for Housing

The removal of a storey form houses 2,3,4 and 21 would result in the loss of a significant amount of floor space that has been proposed for the development and thus reducing the plot ratio of the site. This would constitute an unsustainable form of development and would have an unacceptable impact on the viability of the proposal. We submit that the proposal is acceptable in its current format as submitted at Further Information stage and should be permitted as proposed by An Bord Pleanála.

7.2 Condition No. 10(d)

Our client was surprised with the imposition of Condition no. 10(d) and respectfully submit that this condition has not been fully thought through by the Planning Authority. The specific condition subject of this appeal is Condition 10 (d) which reads as follows:

Condition No. 10 (d)

"10. Landscape Design Proposals

Prior to the commencement of development the applicant/developer shall submit, for the written agreement of the Planning Authority, following consultation with SDCC's Public Realm Section if needed, a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. This shall include the following:

(d) Unless otherwise agreed in writing, the proposed attenuation tank shall not be located under the main open space for the proposed development. The proposed attenuation tank should be relocated and reduced in size through the provision of additional natural SUDS features as part of the storm/surface water drainage scheme for the proposed development."

The applicant is happy to accept condition 10(a),(b), (c) and (e) that relate to landscaping and SuDs provision.

During the Further Information response period the design team liaised with Mr Brian Harkin (Senior Executive Engineer SDCC) and agreed a surface water strategy. The design team added SuDS features such as; swales, infiltration trenches, rainwater gardens, and permeable paving to reduce the surface water runoff and act as attenuation in storm events, these features provide 135m³ of storage. However, it is not possible to attenuate the full 1:100 year storm (211m³) in the SuDS features alone. SDCC have stated that the attenuation system is to be relocated away from the open space, the design team note there is no other viable area for an attenuation system to be located.

We refer to the reports and drawings submitted at Further Information stage by POGA consulting engineers that relate to this matter. Specifically, Section 2 of the Engineering Planning Report Further Information that responded to Item 5(a) in relation to the attenuation tank and Appendix D and Drawing no. 21029-102 & 21029-105 that illustrate the details relating to the attenuation storage capacity proposed.

We therefore invite the Board to consider the following points raised in relation to Condition no. 10(d) and omit this condition entirely.



8 Alternative Design Option for Approval

This appeal has set out that the proposal as originally applied for, and modified at FI stage, is appropriate and should be granted permission. However, in the event that An Bord Pleanála is minded to uphold South Dublin County Councils decision and conditions attached relating to the omission of floor levels as requested (Condition 2b), we have provided an alternative option that maintains a viable quantity of floor space for this much needed residential development.

In the event that the Board is not minded to grant permission for the development as submitted at Further Information stage, we would ask that they give some consideration to these alternative options now presented.

The issue of viability is of very real concern to our clients and whilst the scheme as applied for (and amended at FI) is their preferred option, they are both conscious and concerned as regards the economic viability of the development proposal and the delivery of housing for the area.

8.1 Proposed Development

The alternative design option that is presented below maintains 22 no. houses to be proposed to ensure that a commercially viable scheme can be delivered whilst addressing some of the concerns as raised by the Council in Condition 2. Condition 2 b is of specific reference.

The design option for consideration by An Bord Pleanála is summarised below and, in our view, represents an appropriate updated design response:

- House 1 and 2 amended to semi-detached block with a lower roof level;
- Houses 21 and 22 have a reduced roof level;
- House 3,4,5 and 6 have been amended to form a Terrace block with a step between 4 &5.

The site layout of this alternative design option is inserted below.



Figure 11 – Site Layout of the Proposed Alternative Design Option for the Approval of An Bord Pleanála [Source BBA Architecture]



8.1.1 Omission of 1 no. storey from House Nos. 2 and 21

The roof design of houses no. 2 and 21 have been revised to reduce the "visual impact when viewed from Whitechurch Road" and to address the immediate step up in floor level to the attached houses.

House Nos. 1 and 2

House no. 1 and 2 have been redesigned to form a semi detached block. The main consideration here is the omission of 1 no. storey from house no. 2 to address the concerns of the planning authority in relation to the view from Whitechurch Road and to provide a more gradual transition into the scheme.



Figure 12 – Proposed Elevations of house Nos. 1 and 2 [Source BBA Architecture]



House Nos. 21 and 22

As mentioned previously house no. 21 and 22 have also been redesigned to form a semi detached block with the omission of 1 no. storey from house no. 21, again to propose a more gradual transition into the scheme.





Figure 13 - Proposed Elevations of house Nos. 1 and 2 [Source BBA Architecture]



8.1.2 Proposed Terrace block incorporating House Nos. 3,4,5 and 6

The extract below illustrates the changes that have been made to house Nos. 3,4,5 and 6 that are now proposed as a terrace to facilitate the changes made to house no. 2. Access is provided to the rear of houses 3 and 6 while bin storage has been provided to the front of houses 4 and 5.

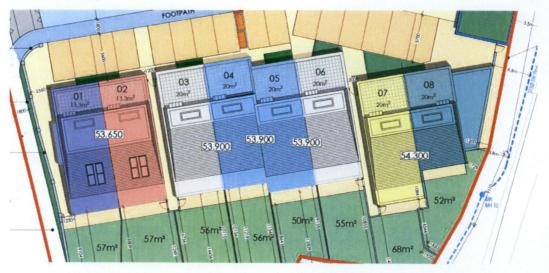


Figure 14 -Extract of Units 1 – 8 of the Proposed Alternative Design Option for the Approval of An Bord Pleanála [Source BBA Architecture]

If the Board is minded to grant permission for this option and feels that this design solution is more appropriate, the applicant would be happy to accept this revised scheme option by condition.

It maintains the majority of total floor space while continuing to provide a high quality design solution for this site.

The drawings prepared by BBA Architecture illustrate an appropriate development solution for this site that can be easily absorbed within the existing context. While the alternative design option provides a response to the concerns the Planning Authority has with the western boundary, we are of the opinion that the scheme as submitted at Further Information stage is also considered appropriate within this setting.



9 Conclusion

We invite An Bord Pleanála to amend the decision of the Planning Authority and remove Condition no. 2 (a) and (b) and 10(d) from the grant of permission for the development proposed.

The rationale for partially removing or omitting a storey from several of the houses is related to visual impact from Whitechurch Road. We respectfully disagree with this conclusion and are of the opinion that this proposed development as submitted at further information stage is appropriate for this site and the development parameters in which it sits.

We believe the scheme is fit for purpose and is in full compliance with Development Plan standards.

We therefore request that the Board amend the decision of South Dublin County Council and remove Condition 2 (a) and (b) from the grant of permission and permit the scheme as submitted at Further Information Stage of the application process. We also ask the Board to remove Condition 10(d) or to allow the applicant to consult and agree on the location and size of the attenuation system on site with the South Dublin County Council Drainage Department as part of the post planning details to be submitted to the planning authority.

An alternative development option has been included for the Board's consideration that would provide alterations to the houses adjoining the western boundary of the site should the Board concur with the conclusions of the Council.

We confirm that we act for the applicant in this case and ask that all future correspondence on this matter be sent to Brock McClure Planning and Development Consultants directly.



MEMO

Project: Whitechurch Road, Rathfarnham - SD22A/0039

Our Ref.: 21029

Date: 13th October 2022

Subject: Appeal of Planning Conditions

Dear Laura,

We are the consulting engineers for Dungrey Limited on the proposed development at Whitechurch Road, Rathfarnham which has been granted planning permission under reference: SD22A/0039. With regards the conditions that were issued by South Dublin County Council we note the following:

Condition 2(a)

"The south-eastern corner of the site reconfigured so that Unit 08 omitted and the bicycle storage building is moved to be setback at least 3 metres from the existing surface water pipe along the eastern boundary of the site"

The existing surface water pipe was moved and is now located over 3m away from Unit 08 and the bike shed. These works were completed alongside the planning application and therefore, not included inside the red line boundary of the application, we liaised with SDCC drainage department regarding the proposed works in the summer. Drawings were issued to Ms Gabrielle McGee for the proposed works and we met with Mr Colm Harte (SDCC Area Inspector) on site to witness the works. Drawing 21029-102-P2 issued as part of the response to further information shows the location of the existing surface water pipe after the works were completed.

Condition 10(d)

"Unless otherwise agreed in writing, the proposed attenuation tank shall not be located under the main open space for the proposed development. The proposed attenuation tank should be relocated and reduced in size through the provision of additional natural SUDS features as part of the storm/surface water drainage scheme for the proposed development."

During the Further Information response period we liaised with Mr Brian Harkin (Senior Executive Engineer SDCC) and agreed a surface water strategy. We added in SuDS features such as; swales, infiltration trenches, rain water gardens, and permeable paving to reduce the surface water runoff and act as attenuation in storm events, these features provide $135 \, \mathrm{m}^3$ of storage. However, it is not possible to attenuate the full 1:100 year storm (211 $\,\mathrm{m}^3$) in the SuDS features alone. SDCC have stated that the attenuation system is to be relocated away from the open space, there is no other viable open for an attenuation system to be located. If it is acceptable to SDCC we can propose to remove the underground storage element of the attenuation system and increase the detention basin storage volume.

poga consulting engineers

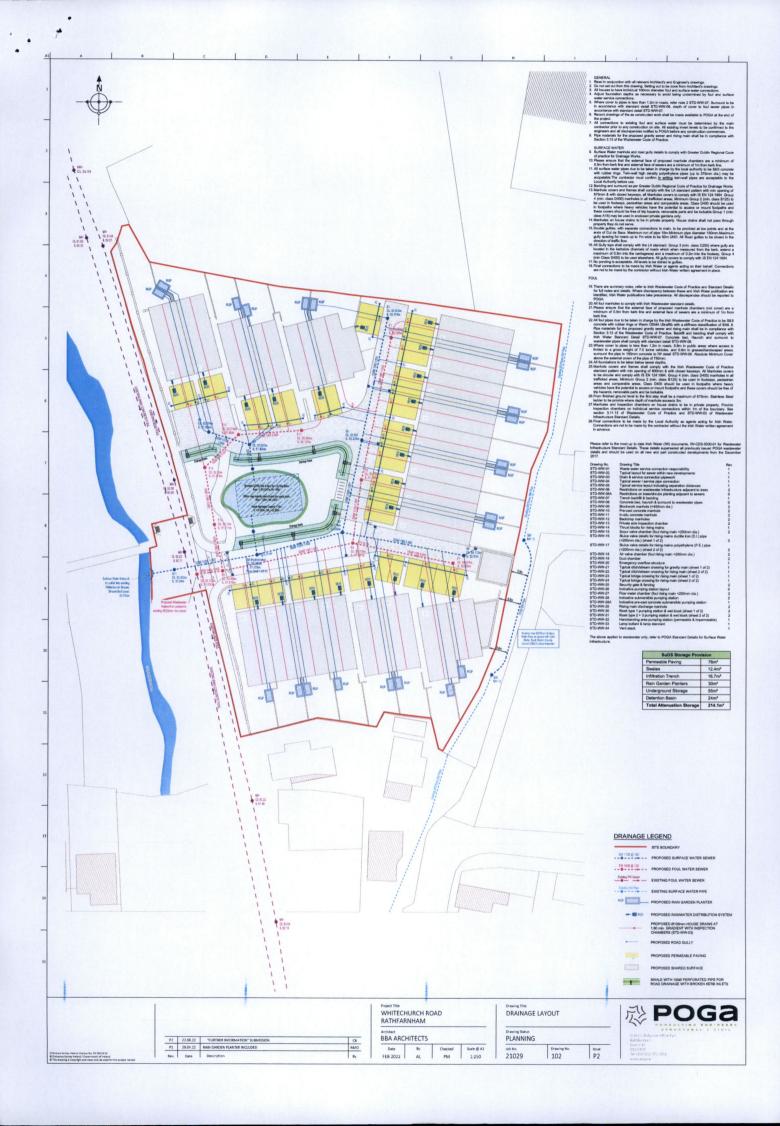
Yours faithful	I۷.
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Noel Mahon

Design Engineer POGA Consulting Engineers

Enclosed:

Drawing 21029-102-P2





Suite 3, Eden Gate Centre, Delgany, Co.Wicklow. A63 C966

- □ (01) 2876949 / 2876950 □ info@bba.ie △ www.bba.ie

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D-122-BP-SL-104	A	GENERAL ARRANGEMENTS SITE LAYOUT		1:250	A1						2					
D-122-BP-SS-500	А	EXISTING & PROPOSED SITE SECTIONS 1-1 & 3-3		1:200	Al						2					
D-122-BP-SS-501	Α	PROPOSED SITE SECTIONS 2-2, 4-4 & 5-5		1:200	A2						2					
D-122-BP-HT-A-A3-200	A	UNIT TYPE A+A3 - SEMI-DETACHED UNITS 1-2 PROPOSED FLOOR PLANS		1:100	A2						2					
D-122-BP-HT-A-A3-300	A	UNIT TYPE A+A3 - SEMI-DETACHED UNITS 1-2 PROPOSED ELEVATIONS + SECTION		1:100	A2						2					
D-122-BP-HT-A1-A2-200	A	UNIT TYPE A1+A2 - TERRACED UNITS 3 - 6 PROPOSED FLOOR PLANS + SECTION		1:100	A1						2					
D-122-BP-HT-A1-A2-300	A	UNIT TYPE A 1+A2 - TERRACED UNITS 3 - 6 PROPOSED ELEVATIONS		1:100	A2						2					
D-122-BP-HT-B-C-200	Α	UNIT TYPE B+C - SEMI DETACHED UNITS 7 - 8 PROPOSED FLOOR PLANS		1:100	A1						2					
D-122-BP-HT-B-C-300	A	UNIT TYPE B+C - SEMI DETACHED UNITS 7 - 8 PROPOSED ELEVATIONS		1:100	A2						2					
D-122-BP-HT-B-C-400	A	UNIT TYPE B+C - SEMI DETACHED UNITS 7 - 8 PROPOSED CROSS SECTIONS		1:100	A2						2					
D-122-BP-HT-A1-A2-205	A	UNIT TYPE A1+A2 - TERRACED UNITS 9-16 GROUND & FIRST FLOOR PLAN		1:100	A1						2					
D-122-BP-HT-A1-A2-206	A	UNIT TYPE A1+A2- TERRACED UNITS 9-16 SECOND & THIRD FLOOR PLAN		1:100	A1						2					
D-122-BP-HT-A1-A2-207	A	UNIT TYPE A1 + A2 - TERRACED UNITS 9 - 16 ROOF PLAN + SECTION		1:100	A1						2					
D-122-BP-HT-A1-A2-305	A	UNIT TYPE A1 + A2 - TERRACED UNITS 9 - 16 PROPOSED ELEVATIONS		1:100	A1						2					
D-122-BP-HT-D-E-200	A	UNIT TYPE D+E - SEMI DETACHED UNITS 17-18 PROPOSED FLOOR PLANS + SECTIONS		1:100	A1						2					
D-122-BP-HT-D-E-300	A	UNIT TYPE D+E - SEMI DETACHED UNITS 17-18 ELEVATIONS		1:100	A2						2					
D-122-BP-HT-E-B-200	A	UNIT TYPE E+B - SEMI DETACHED UNITS 19-20		1:100	A1						2					
D-122-BP-HT-E-B-300	A	PROPOSED FLOOR PLANS + SECTION UNIT TYPE E+B - SEMI DETACHED UNITS 19-20 ELEVATIONS		1:100	A2						2					
D-122-BP-HT-A-A3-205	A	UNIT TYPE A+A3 - SEMI-DETACHED UNITS 21-22		1:100	A2						2					
D-122-BP-HT-A-A3-305	A	PROPOSED FLOOR PLANS UNIT TYPE A+A3 - SEMI-DETACHED UNITS 21-22 PROPOSED ELEVATIONS + SECTION		1:100	A2						2					
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HOUSING QUALITY A	ASSESSMENT				
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CLIENT NAME : DUNGREY LTD					
ISSUE: BORD APPEAL	JOB REF: D-122	SHEET: 1 OF 1	DATE OF ISSUE: 17TH OCTOBER 2022		
			Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities March 2018	bba.architecture	
HOUSING		Design Standards	Quality Housing for Sustainable Communities	bba.architecture	
			South Dublin County Development Plan 2016-2022		

Unit Type	Unit Number	Unit Description	F.F.L.	Minimum Gross Floor Area (m²) Table 5.1 QHSC*	Gross Floor Area (m²)	Compliance Yes/No	Minimum Living Room Area (m²) Table 5.1 QHSC*	Living Room Area Provided (m²)	Compliance Yes/No	Minimum Aggregate Living Area (m²) Table 5.1 QHSC*	Aggregate Living Area Provided (m²)	Compliance Yes/No	Minimum Aggregate Bedroom Area (m²) Table 5.1 QHSC*	Aggregate Bedroom Area Provided (m²)	Compliance Yes/No	Minimum Storage Area (m²) Table 5.1 QHSC*	Storage Area Provided (m²)		Private Open SDCC Dev Plan Minimum Private Open Space	Garden Area Provided (m²)	Compliance Yes/No
Α	1	4 Bed - 2 Storeys - 7p - Semi Detached	53.650	120	174	YES	15	21.5	YES	40	55.5	YES	43	60.2	YES	6	10.3	YES	70	75	YES
А3	2	4 Bed - 2 Storeys - 7p - Semi-Detached	53.650	120	171.5	YES	15	15	YES	40	50	YES	43	53.5	YES	6	11.7	YES	70	70.3	YES
A2	3	4 Bed - 4 Storeys - 7p - End of Terrace	53.900	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	76	YES
A1	4	4 Bed - 4 Storeys - 7p - Mid of Terrace	53.900	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	76	YES
A1	5	4 Bed - 4 Storeys - 7p - Mid of Terrace	53.900	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	70	YES
A2	6	4 Bed - 4 Storeys - 7p - End of Terrace	53.900	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	75	YES
В	7	4 Bed - 4 Storeys - 7p - Semi-Detached	54.300	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	88	YES
C	8	4 Bed - 4 Storeys - 7p - Semi-Detached	54.300	120	233.5	YES	15	22	YES	40	60	YES	43	68.3	YES	6	9.5	YES	70	72	YES
A2	9	4 Bed - 4 Storeys - 7p - End of Terrace	54.100	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	70.5	YES
A1	10	4 Bed - 4 Storeys - 7p - Mid of Terrace	54.100	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	70	YES
A1	11	4 Bed - 4 Storeys - 7p - Mid of Terrace	54.100	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	70	YES
A1	12	4 Bed - 4 Storeys - 7p - Mid of Terrace	54.100	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	70.5	YES
A1	13	4 Bed - 4 Storeys - 7p - Mid of Terrace	54.325	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	75.2	YES
A1	14	4 Bed - 4 Storeys - 7p - Mid of Terrace	54.325	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	74.3	YES
A1	15	4 Bed - 4 Storeys - 7p - Mid of Terrace	54.325	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	72.5	YES
A2	16	4 Bed - 4 Storeys - 7p - End of Terrace	54.325	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	132	YES
D	17	5 Bed - 4 Storeys - 7p - Semi-Detached	53.925	120	231	YES	15	22	YES	40	57	YES	43	70.9	YES	6	9.1	YES	70	73.5	YES
E	18	4 Bed - 4 Storeys - 7p - Semi-Detached	53.925	120	195	YES	15	15	YES	40	40	YES	43	58.1	YES	6	8.1	YES	70	73	YES
E	19	4 Bed - 4 Storeys - 7p - Semi-Detached	53.550	120	195	YES	15	15	YES	40	40	YES	43	58.1	YES	6	8.1	YES	70	71	YES
В	20	4 Bed - 4 Storeys - 7p - Semi-Detached	53.550	120	205	YES	15	15	YES	40	50	YES	43	58.1	YES	6	10.4	YES	70	71	YES
A3	21	4 Bed - 2 Storeys - 7p - Semi-Detached	53.275	120	171.5	YES	15	15	YES	40	50	YES	43	53.5	YES	6	11.7	YES	70	70.3	YES
Α	22	4 Bed - 2 Storeys - 7p - Semi Detached	53.275	120	174	YES	15	21.5	YES	40	55.5	YES	43	60.2	YES	6	10.3	YES	70	91.3	YES

SCHEDULE OF ACCOMMODATION	ON			
JOB NAME : RESIDENTIAL SCHEME @ SILVERA	ACRE, WHITECHURCH ROAD, RATHFARNHAM	, DUBLIN 14		
CLIENT NAME: DUNGREY LTD				
ISSUE: BORD APPEAL ISSUE	JOB REF: D-122	SHEET: 1 OF 1	DATE OF ISSUE: OCTOBER 2022	
Design Standards	Sustainable Urban Housing: I Quality Housing for Sustainal South Dublin County Develop		March 2018	bba.architecture

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			AREA OF GROUND		EXISTING STRU		TOTAL PROPOSED	TOTAL PROPOSED		TOTAL PROPOSED	% PUBLIC	TOTAL
OVERALL SITE AREA sqm	PROPOSED RESIDENTIAL UNITS	SITE DENSITY UNITS PER HA.	COVERED BY BUILDING Sqm	SITE COVERAGE	EXISTING RETAINED STRUCTURES Sqm	PROPOSED	RESIDENTIAL AREA Sqm	NON RESIDENTIAL AREA Sqm		PUBLIC OPEN SPACE Sqm	OPEN SPACE	PROPOSED CAR PARKING
5820	22	37.8	1873	32%	0	0	4415.5	34	0.76	580	10%	44

SCHEDULE OF ACCO	MODATION			UNIT TYPE QUANTITY	•				CAR PARKING	BICYCLE PARKING PROVISION	SINGLE ASPECT	
RESIDENTIAL		1 BED	2 BED	3 BED	4 BED	5 BED	GIA (Sqm)	TOTAL GIA (Sqm)	PROVISION	(only mid-terraced visitors + duplex + apt.)	UNITS	DUAL ASPECT UNITS
	Type A - 4 Bed - 3 Storeys - Semi- Detached - Side Entry				2		174.0	348.0	2	No provision in development plan		2
	Type A1 - 4 Bed - 4 Storeys - Mid- Terrace				8		205.0	1640.0	2	No provision in development plan		8
	Type A2 - 4 Bed - 4 Storeys - End of Terrace				4		205.0	820.0	2	No provision in development plan		4
	Type A3 - 4 Bed - 3 Storeys - Semi- Detached				2		171.5	343.0	2	No provision in development plan		2
House Units	Type B - 4 Bed - 4 Storeys - Semi- Detached				2		205.0	410.0	2	No provision in development plan		2
	Type C - 4 Bed - 4 Storeys - 7p - Semi-Detached				1		233.5	233.5	2	No provision in development plan		1
	Type D - 5 Bed - 4 Storeys - 7p - Semi-Detached					1	231.0	231.0	2	No provision in development plan		1
	Type E - 4 Bed - 4 Storeys - Semi- Detached				2		195.0	390.0	2	No provision in development plan		2
	TOTAL HOUSES	0	0	0	21	1		4415.5	44	No provision in development plan	0	22
RESIDENTIAL DEV. (22	TOTAL UNITS	0	0	0	21	1		4415.5	44	No provision in development plan	0	22
UNITS)	PERCENTAGE MIX	0.00%	0.00%	0.00%	95.45%	4.55%					0.00%	100.00%