



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

PLANNING REPORT

Amendments to Permitted Development Under Reg. Refs. SD16A/0269 and SD18A/0285

Larkfield House, Coldcut Road,
Clondalkin, Dublin 22
D22 X657

SOUTH DUBLIN COUNTY COUNCIL

NOVEMBER 2022

SUBMITTED ON BEHALF OF:
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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our client, Cavvies Limited, to prepare this report to accompany an application to South Dublin County Council for proposed alterations to the existing units at Larkfield House, Coldcut Road, Clondalkin, Dublin 22, D22 X657 to ensure all units meet the minimum requirements for apartments as outlined in *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*. The description of the proposed development, as per the statutory notices, is as follows:

'alterations to previously approved development (Reg. Refs. SD16A/0269 and SD18A/0285) comprising: 1. Retention permission for: (i) an increase in the number of residential apartment units from 37 no. to 42 no. units now consisting of 2 no. one-bedroom units, 34 no. two-bedroom units, and 6 no. three-bedroom units, and; (ii) all associated site and engineering works necessary to facilitate the development. 2. Planning permission for: (i) the amalgamation of unit nos. 22 and 23 and the amalgamation of unit nos. 34 and 33; (ii) internal alterations to provide for an increased quantum of storage space; (iii) alterations to private amenity spaces to provide for extension of ground floor private courtyards and balconies, of unit nos. 6-11, 17-20, 22-25, 27-30, 32-35, and 37-40 and the addition of private amenity spaces to unit nos. 12-16, 21, 26, 31, 36, and 41-42; (iv) the provision of fire escape stairs from the third floor to the fourth floor; (v) revisions to the permitted site layout to now provide for 50 no. car parking spaces (inclusive of 3 no. disabled parking spaces and 5 no. electric vehicle charging spaces); (vi) the provision of 110 no. residential bicycle spaces (88 no. residential bicycle spaces and 22 no. visitor bicycle spaces); (vii) relocation of bin store from eastern boundary wall to northern boundary wall; (viii) landscaping, including communal public open space comprising 1 no. playground (583 sq.m total), and all associated boundary treatments, and; (ix) all associated site and engineering works necessary to facilitate the development.'

This report includes an assessment of the application site and proposed development, having regard to the South Dublin Development Plan 2022-2028. It is submitted that the proposed development is fully compliant with the various qualitative and quantitative standards of the Development Plan and the proposed alterations seek to improve the standard of residential accommodation and amenity afforded to the existing units. This planning report sets out our client's preliminary concept to improve the overall standard of accommodation at Larkfield House.

The project architects, HA Design Studio, prepared a revised layout and design of the existing units to guarantee their compliance with national and local policy and guidance. The revised layout and design prepared by HA Design Studio, has been assessed by H3D daylight specialists, and their findings concluded that the proposal meets and/or exceeds the requirements for internal daylight access. In addition, the clients' have engaged Casey Planning and Landscape Consultancy to provide the Landscape Plan submitted with this application.

This report sets out the planning merits of the proposal in the context of the requirements of the South Dublin County Development Plan 2022-2028 and other relevant policy documents and relevant standards of the planning authority. It is submitted from the outset that we are of the opinion that the proposed development accords with the proper planning and sustainable development of the area and permission should be **granted** accordingly.

1.1 Pre-Planning Consultation

Prior to lodgement of the application, the project design team and Applicant engaged in pre-planning discussions with South Dublin County Council. This included a Section 247 consultation meeting which took place with the Planning Authority on 28th April 2021 (Ref. No. PP035/21). The attendees were as follows:

Attendees: Tracy McGibbon – Senior Executive Planner (South Dublin County Council)
Donal Farrelly – Executive Planner (South Dublin County Council)
Ronan Toft – Drainage Engineer (South Dublin County Council)
Graham Murphy – Roads Department (South Dublin County Council)
Yasin Khan – Roads Department (South Dublin County Council)
Aws Taki – Roads Department (South Dublin County Council)
Kevin Hughes – Hughes Planning and Development Consultants (Director)
Cian Heffernan – H3D (Owner)

Justin Halpin – HA Design Studio (Director of Architecture)
Domenica Musolino – HA Design Studio (Senior Architect)

This pre-planning meeting revolved around architectural drawings, a Daylight Analysis, and a pre-planning statement, prepared by HA Design Studio, H3D, and Hughes Planning and Development Consultants, respectively, circulated prior to the meeting. The Council concluded that the proposed development was generally acceptable.

2.0 Site Location and Description

The subject site is located on the southern side of Coldcut Road, Clondalkin, to the west of the M50 motorway. The site currently comprises a detached five-storey building which is in residential use, with a car parking area to the front. The front façade of the existing building on site comprises full glazing. The existing building comprises 44 no. apartments.

Clondalkin Town Centre is located approximately 3.9km south of the site (9-minutes' drive). The Cold Cut Club is located immediately east of the subject site, with Liffey Valley Major Retail Centre located north of Coldcut Road, across from the subject site. The subject site is served by public transport, with 2 no. Dublin Bus stops located immediately northeast, which serve route no's 26, 40, 76 and 76a. These bus routes serve Charlestown Shopping Centre, O'Connell Street, Tallaght, Chapelizod and Merrion Square. Liffey Valley Shopping Centre provides a range of amenities and services, and there are a number of supermarkets here such as Tesco Extra, Dunnes Stores and Marks and Spencer.



Figure 1.0 Aerial image showing the locational context of the subject site (outlined in red)



Figure 2.0 Aerial image showing subject site outlined in red.



Figure 3.0 Street view image indicating the subject site (viewed from the north)



Figure 4.0 Street view image of the subject site (viewed from the northwest)

3.0 Planning History

A review of South Dublin County Council Planning Registry has found the following planning applications relating to the subject site.

Reg. Ref. S01A/0485 Permission granted by South Dublin County Council on 17th of April 2002 for the erection of a 2 storey, Leisure Facility to include a 25-metre swimming pool, reception, changing rooms, gymnasium, recreational facilities, coffee shop and ancillary works.

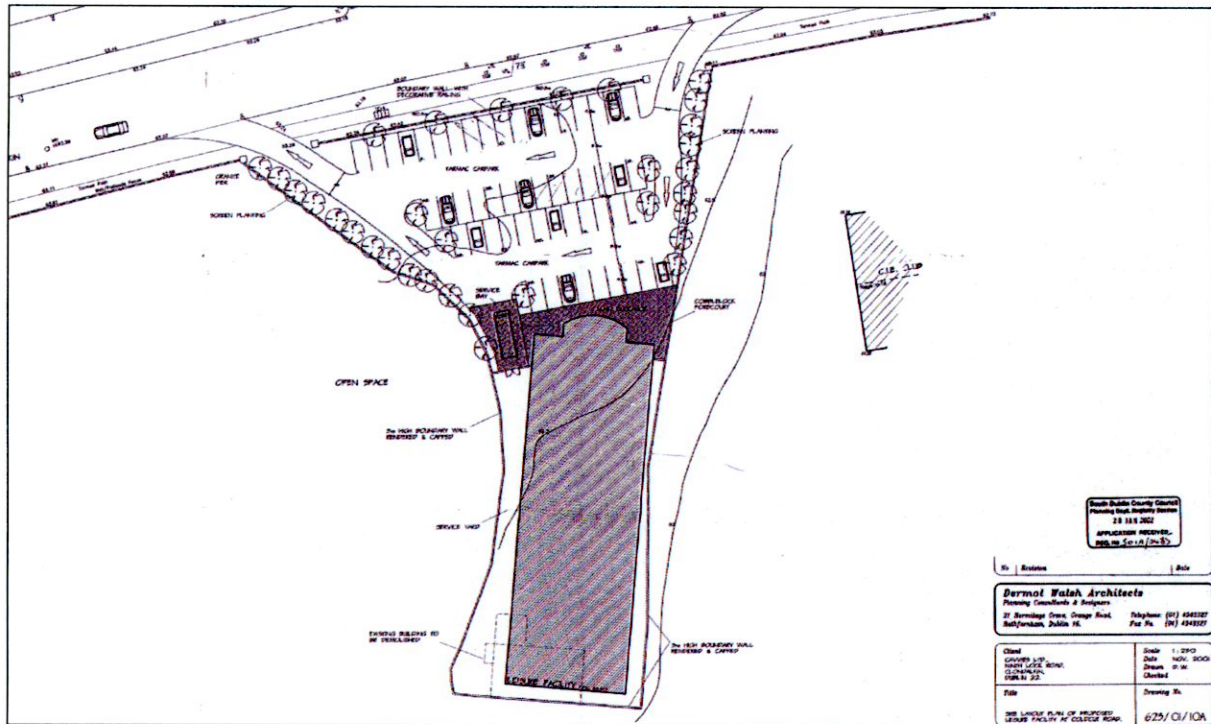


Figure 5.0 Extract of site layout plan granted under Reg. Ref. S01A/0485 (Drawing No. 623/01/10A). Site area shown at 0.4245 hectares with 53 no. car parking spaces provided and existing building to be demolished.

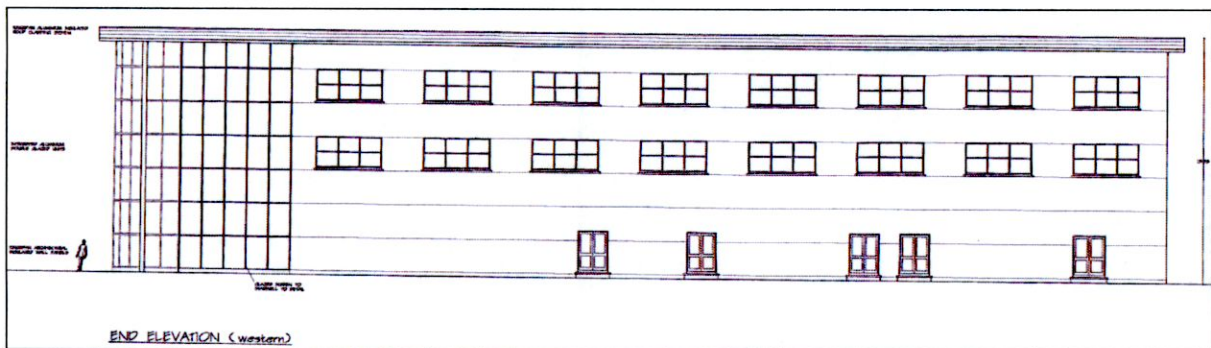


Figure 6.0 Western elevation of Leisure Centre granted under Reg. Ref. S01A/0485.

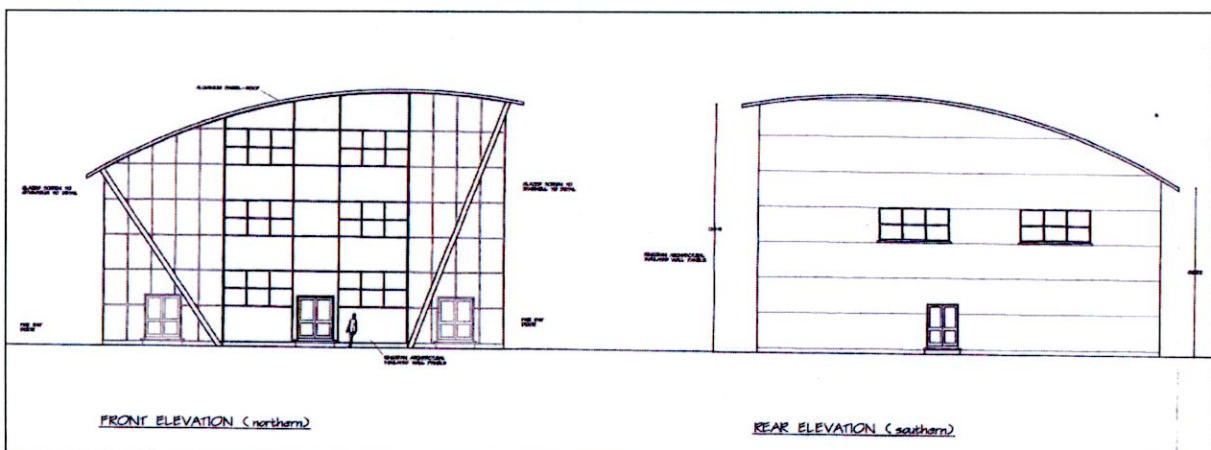


Figure 7.0 Front (left) and rear (right) elevation of proposal granted under Reg. Ref. S01A/0485.

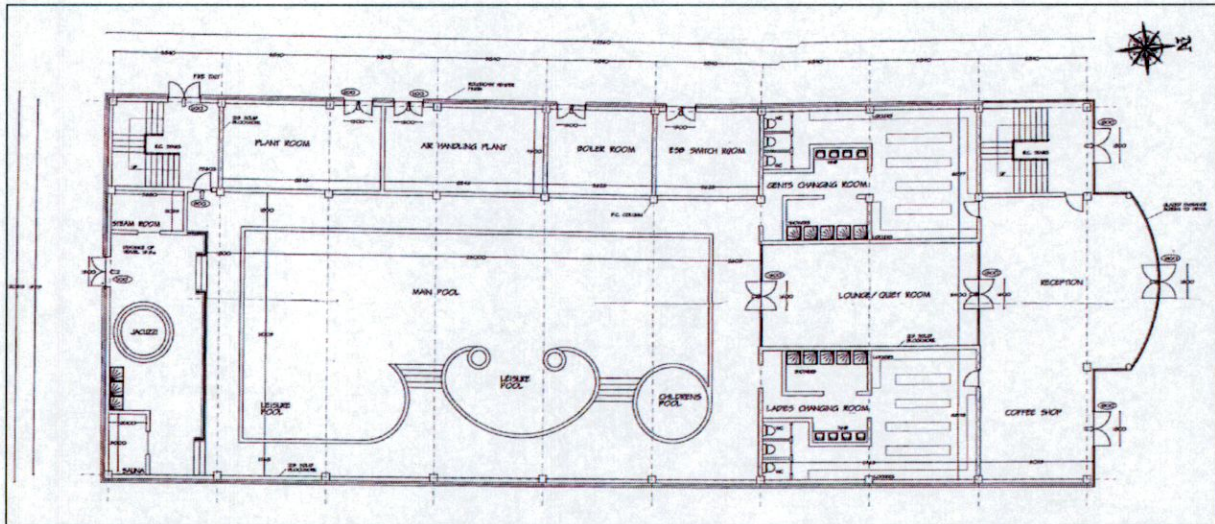


Figure 8.0 Ground floor plan granted under Reg. Ref. S01A/0485 showing 25m swimming pool.

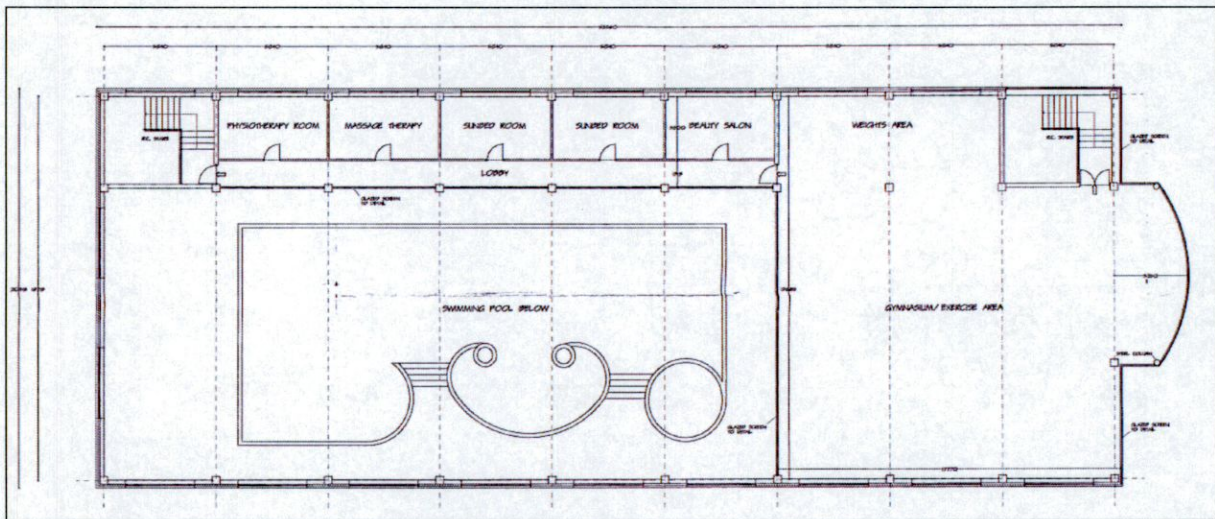


Figure 9.0 First floor plan granted under Reg. Ref. S01A/0485.

Reg. Ref. SD03A/0184 Retention permission was granted by South Dublin County Council on the 9th of October 2003 for alterations to the approved Leisure Facility (Reg. Ref. S01A/0485) from 2 storey to 3 storey building to include alterations to elevations, additional floors, a 30 metre swimming pool, reception, changing rooms, gymnasium, recreational facilities, coffee shop, and ancillary works.

The original planning application for the Leisure Facility (Reg. Ref. S01A/0485) provided for a 2 storey building, 13 metres tall, with a gross floor area of 1596 sq.m. The proposed development granted retention permission, under Reg. Ref. SD03A/0184, consists of a 3 storey building, 19 metres tall, with an additional mezzanine floor. The gross floor increased to 4023 sq.m. The site area was also increased from 1.05 acres (0.4245 hectares) to 1.4 acres (0.5666 hectares).

The proposal also provided for changes at the ground floor level to enlarge the changing facilities and the removal of the proposed lounge and plant/services areas. At the first floor level, the service facilities and gymnasium area were also enlarged. Further to this, the additional mezzanine floor now provides for the plant/services area and the second storey comprises an additional aerobics/exercise area. Lastly, the elevations changed minimally as there was an increase in the number and size of window openings.

We note that the Planner's Report states that the *'increased car parking component on site...is considered acceptable'*.

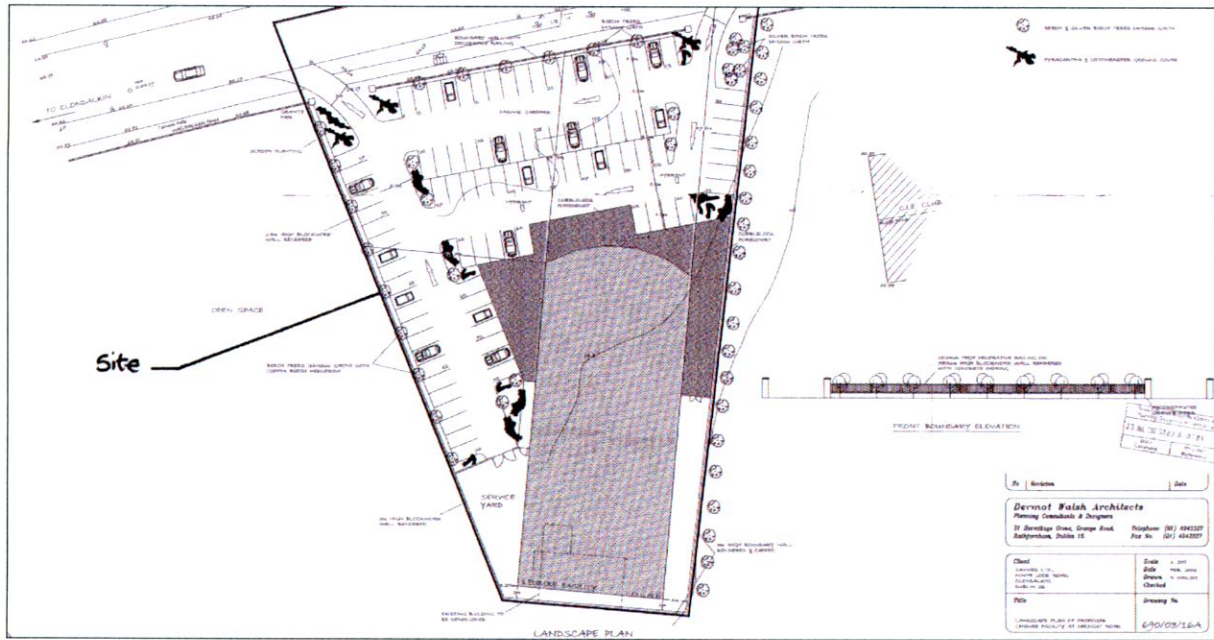


Figure 10.0 Landscape plan proposed under Reg. Ref. SD03A/0184. Site shows 97 no. car parking spaces provided.

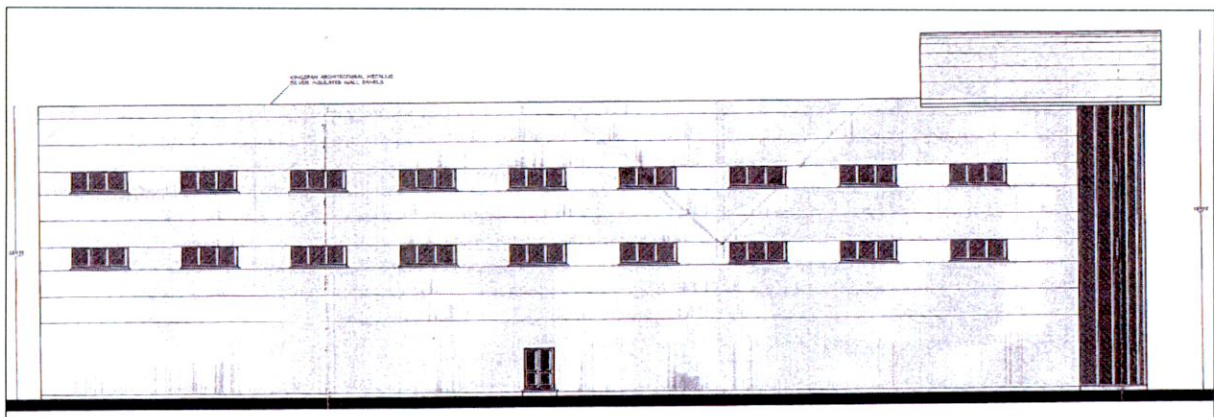


Figure 11.0 Eastern elevation granted under Reg. Ref. SD03A/0184.

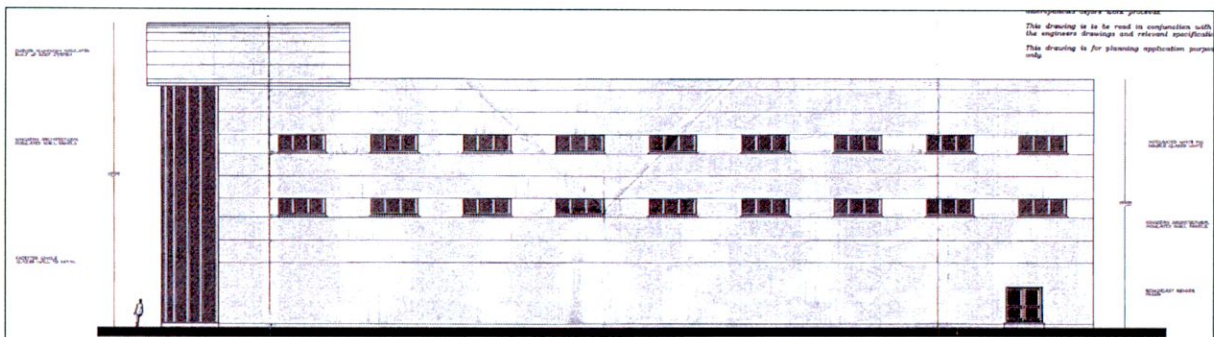


Figure 12.0 Western elevation for development granted under Reg. Ref. SD03A/0184.

The proposed elevation under this application shows changes to the façade to include smaller windows and the retention of 1 no. proposed door to the west.

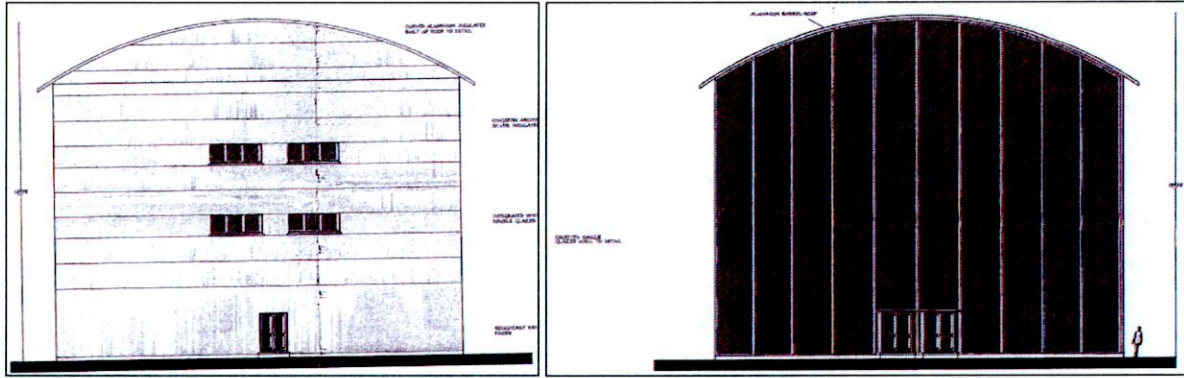


Figure 13.0 Rear (left) and front (right) elevation of proposal granted under Reg. Ref. SD03A/0184 showing evenly sloped barrel-roofing with faceted single glazed detail to the front. Additional windows proposed to accommodate the second storey development.

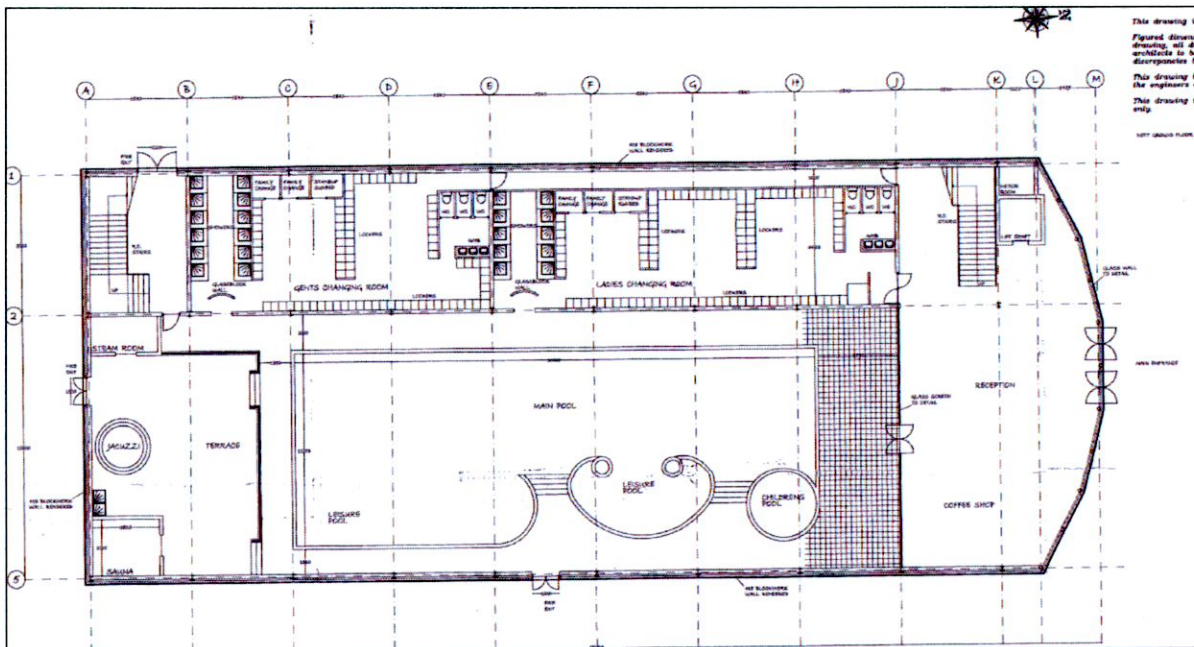


Figure 14.0 Ground floor plan granted under Reg. Ref. SD03A/0184.

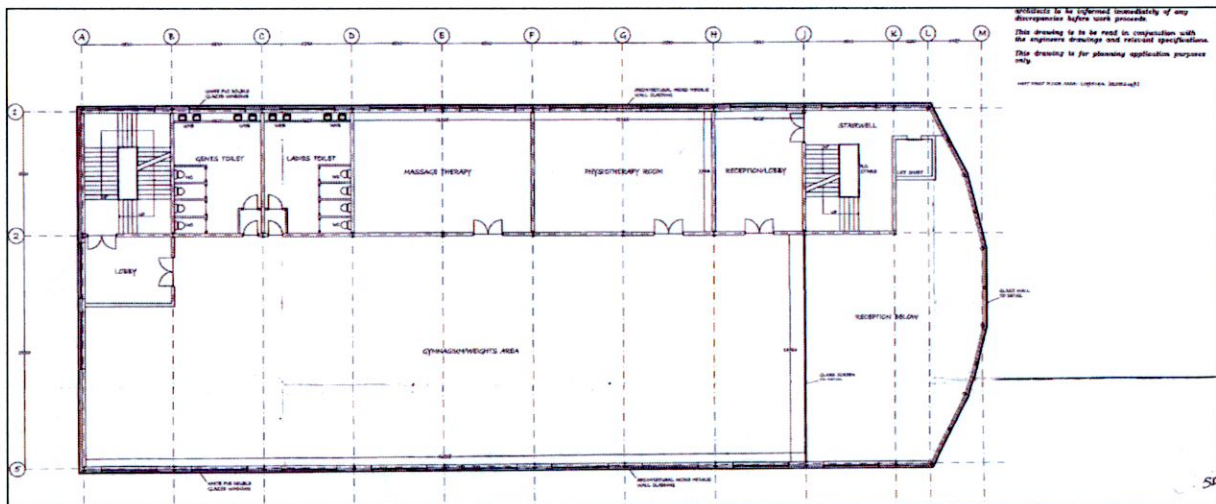


Figure 15.0 First floor plan granted under Reg. Ref. SD03A/0184.

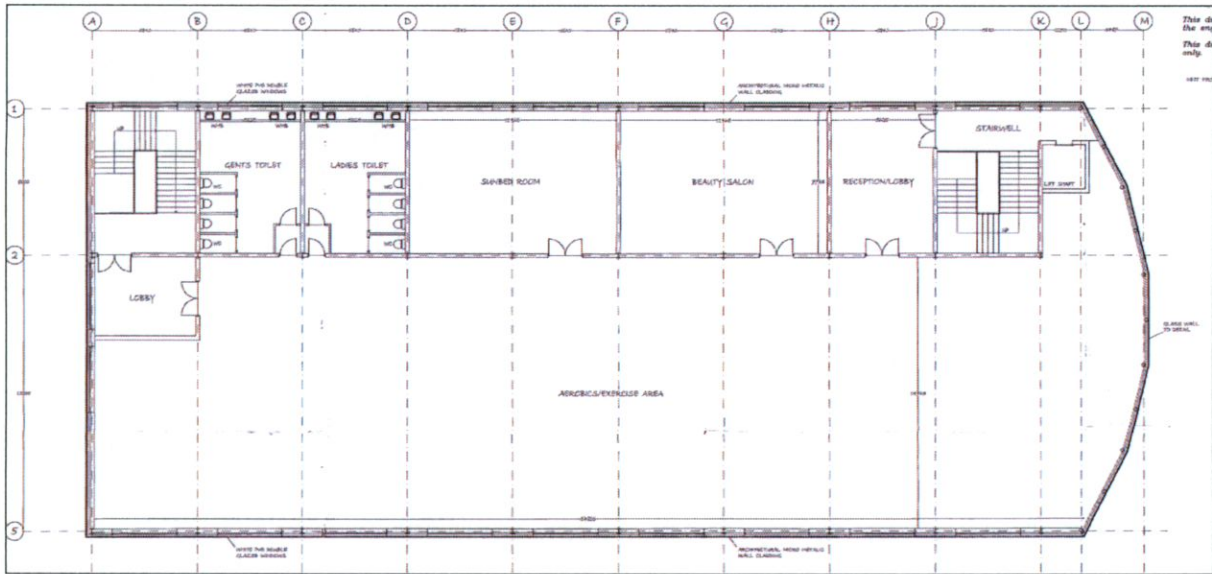


Figure 16.0 Second floor plan granted under Reg. Ref. SD03A/0184.

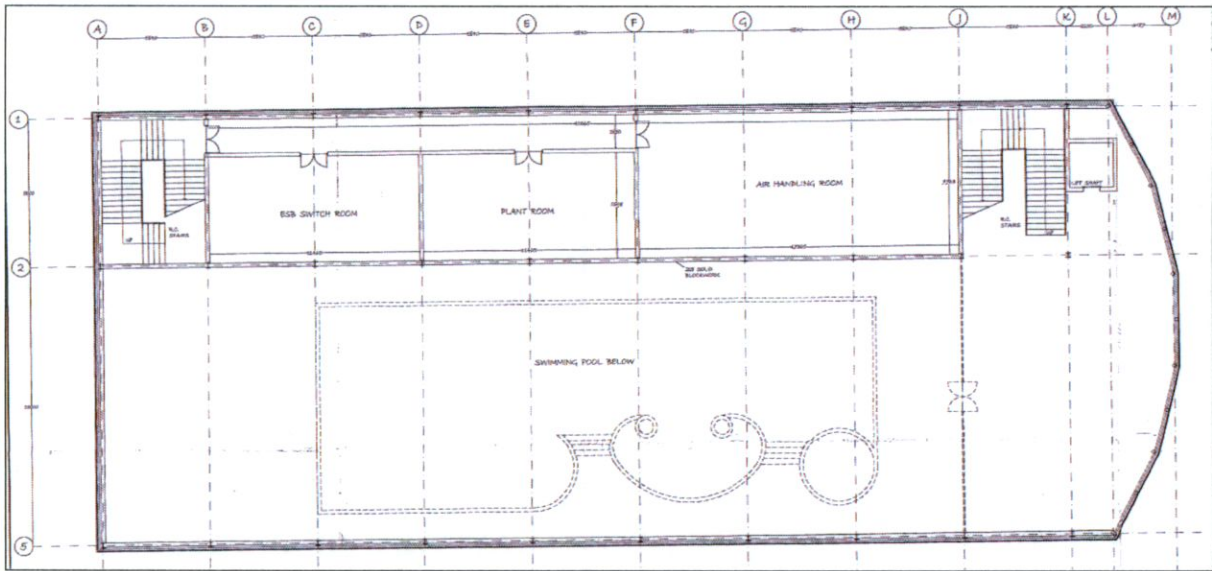


Figure 17.0 Mezzanine area granted under Reg. Ref. SD03A/0184.



Figure 18.0 Image of constructed development c. 2009.

Reg. Ref. SD16A/0249 Permission was granted by South Dublin County Council on the 17th of October 2016 for the change of use of the existing 3 storey building from leisure centre to 27 residential units comprising 24 no. 2 bed units and 3 studios (c. 3,204 sq.m); modifications to elevations incorporating fenestration alterations, new finishes and the provision of the balconies/terraces; an area of landscaped communal open space (c.470sq.m) at ground floor level; 42 surface level car parking spaces; a bicycle store, bin store, new landscaping and boundary treatment and all associated site works. Vehicular access to the development will be via the 2 no. existing entrance/exit points onto Coldcut Road.

The proposal provides for generally sized apartment units in an area dominated by low density housing. In addition, the site area was increased to 0.4566 ha and provides for 42 no. car parking spaces. One concern from the Council is noted in the Planners Report and below:

'Six of the apartments would be dual aspect; given that the proposed development comprises the conversion of an existing building on site, it is not possible to achieve 50% dual aspect; however, in mitigation, it is noted that the proposed units exceed the minimum space standards and all units have access to a generously sized courtyard or balcony/terrace. Therefore, in this instance, single aspect apartments would be acceptable as the proposed development would provide generously sized apartment units in an area dominated by low density housing.'

The mitigation proposed was to amalgamate the adjoining two-bed apartments with the studios in order to create 2 no. one-bed apartments, as the Council considered that studio units are not appropriate at this suburban location. This resulted in providing for 6 no. one-bed apartments and 21 no. two-bed apartments.



Figure 19.0 Site layout plan granted under Reg. Ref. SD16A/0249.

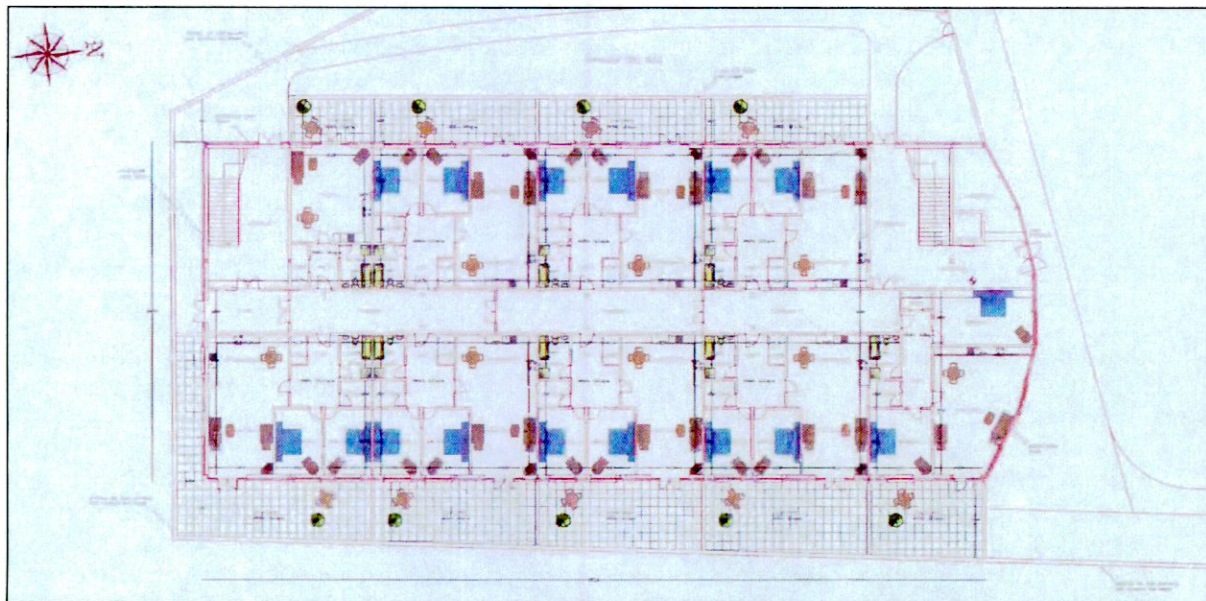


Figure 20.0 Proposed ground floor plan granted under Reg. Ref. SD16A/0249

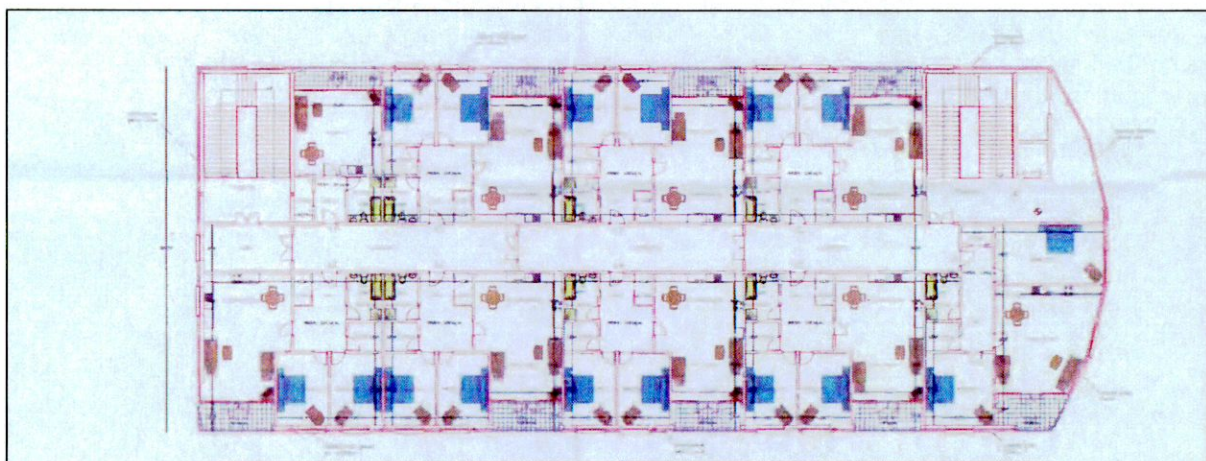


Figure 21.0 Proposed first floor plan granted under Reg. Ref. SD16A/0249.

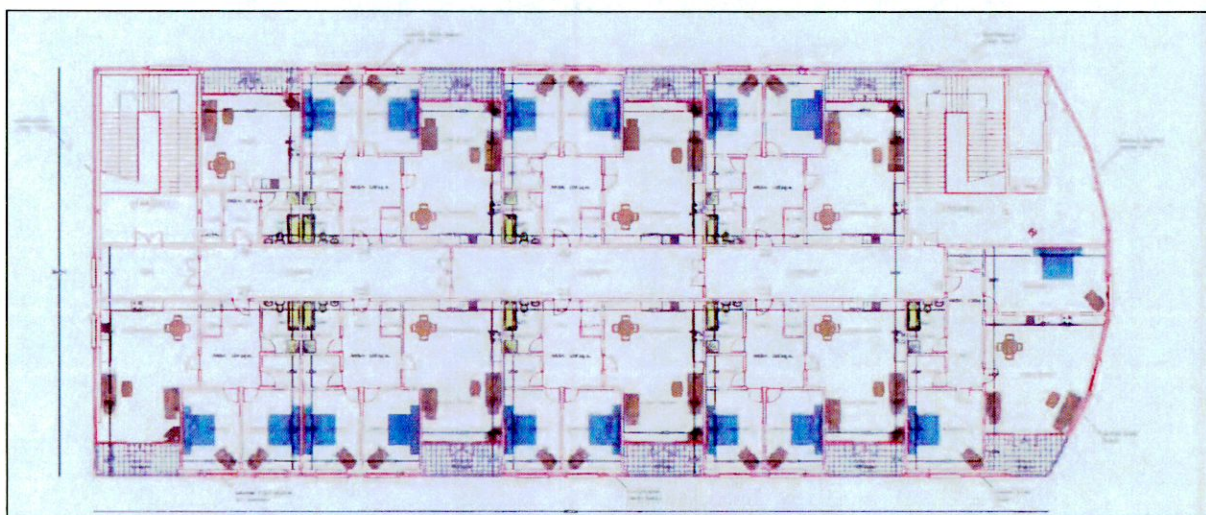


Figure 22.0 Proposed second floor plan granted under Reg. Ref. SD16A/0249.

Reg. Ref. SD17A/0145 Permission was **refused** on 7th of July 2017 (ABP Ref. PL06S.248994) for the change of use of the existing 3 storey building from leisure centre to residential to provide 27 residential units as permitted under SD16A/0249. The modifications include converting and extending as existing mezzanine plant floor to residential use, fenestration alterations (with the addition of new balconies) and a revised car parking layout. A total of 48 residential units (40 2-bed apartments, 4 1-bedroom apartments and 4 studios) are now proposed with 52 car parking spaces. All other aspects of the development remain as permitted under SD16A/0249.

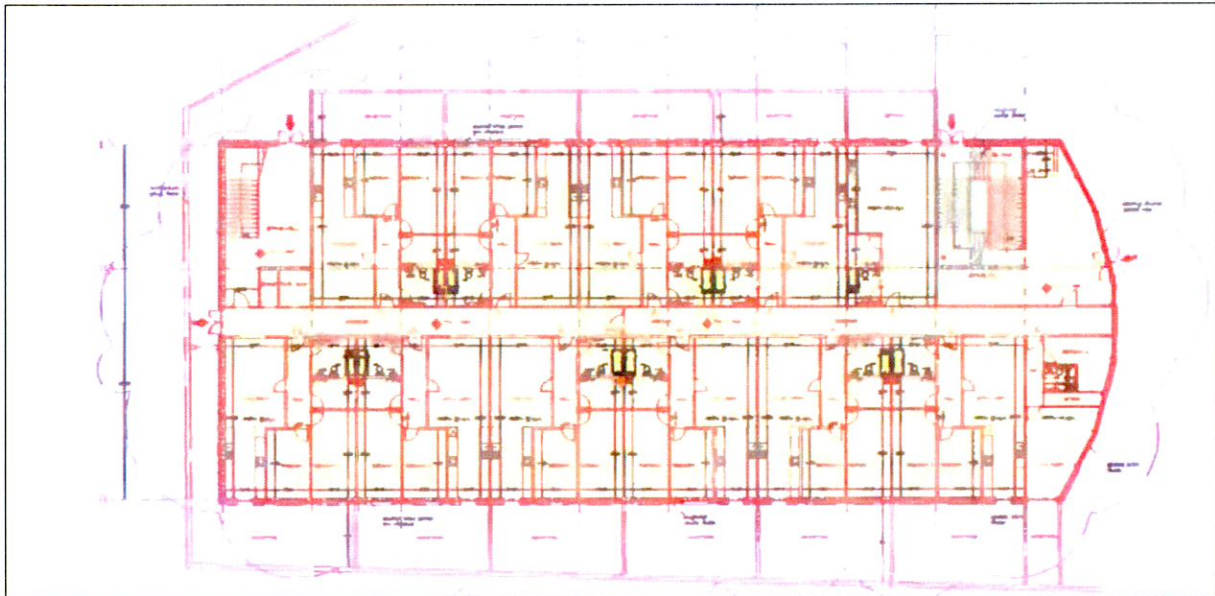


Figure 23.0 Ground floor plan proposed under Reg. Ref. SD16A/0249 showing amended floor layout incorporating an addition 3 no. apartment units.

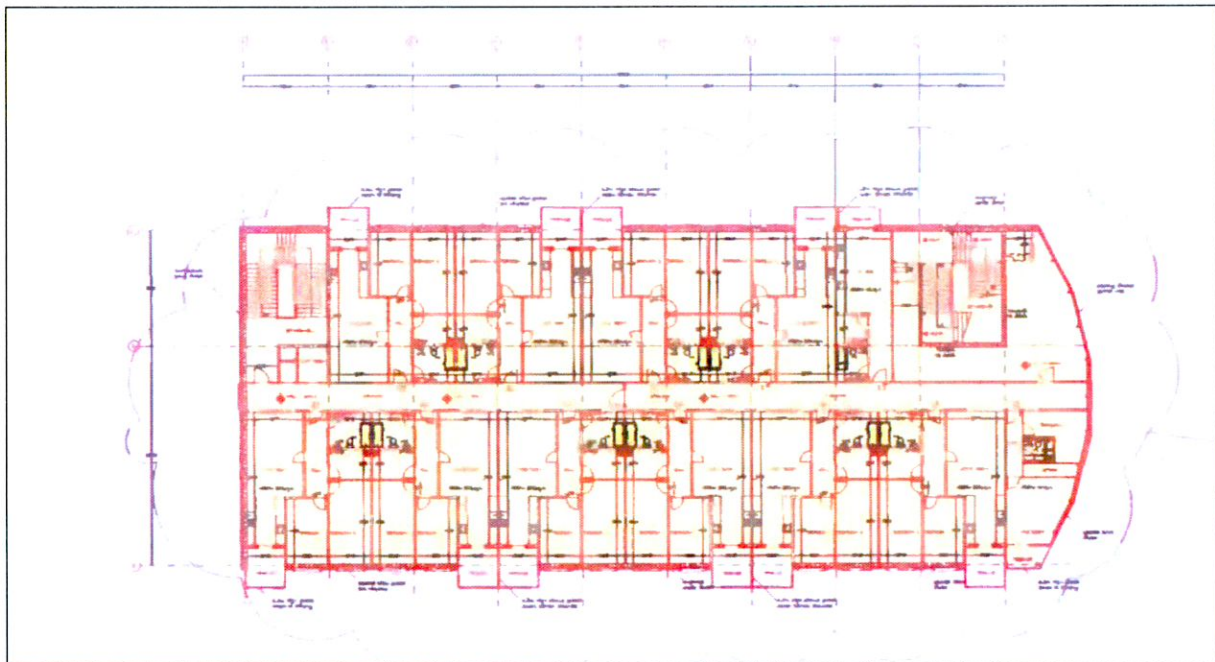


Figure 24.0 First floor plan proposed under Reg. Ref. SD16A/0249 showing the conversion and extension of mezzanine plant room floor to provide for an additional 12 no. apartment units.

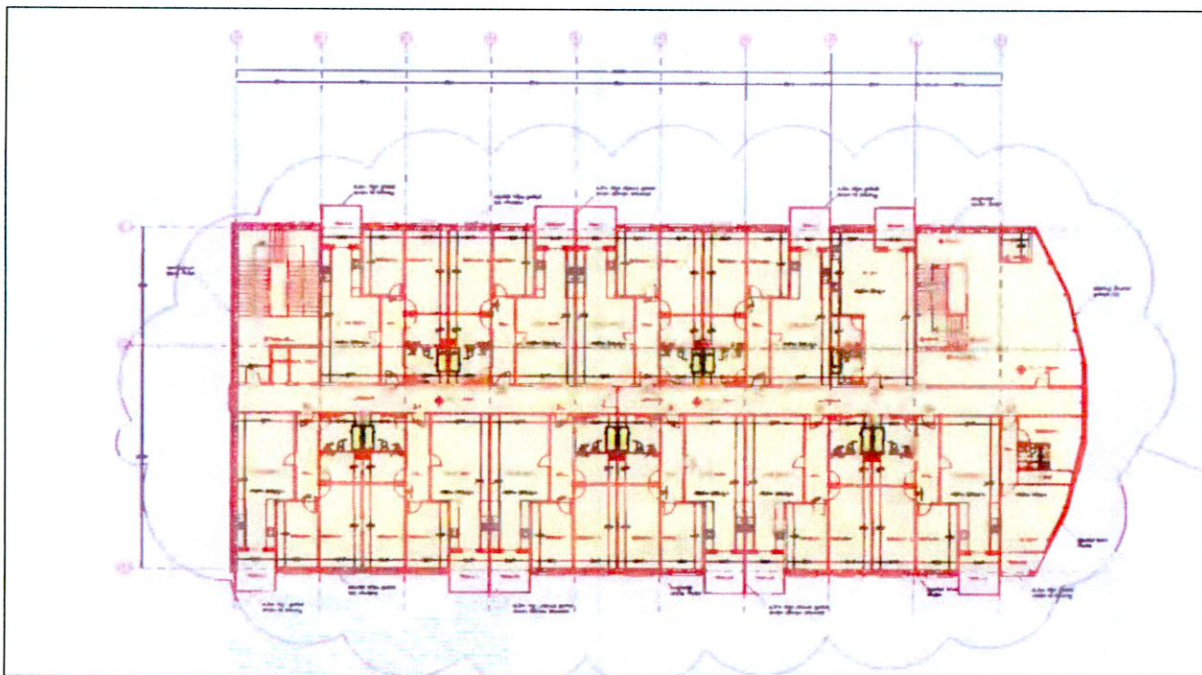


Figure 25.0 Second floor plan proposed under Reg. Ref. SD16A/0249 to amend floor layout incorporating an additional 3 no. apartments.

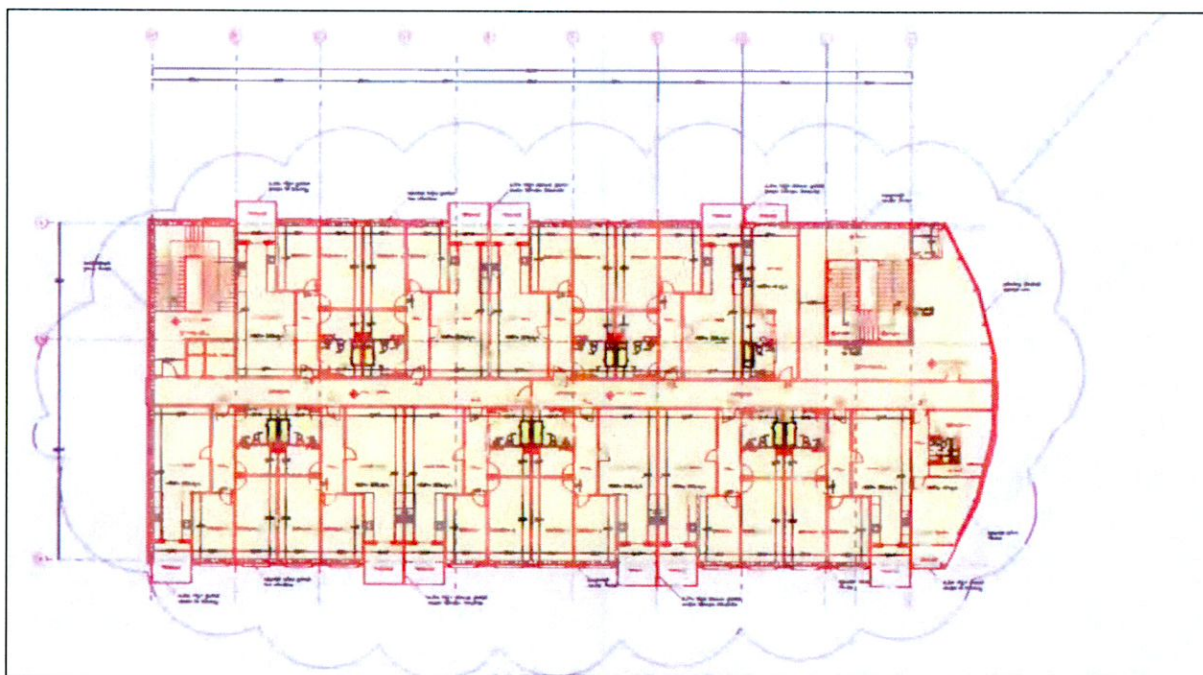


Figure 26.0 Third floor plan proposed under Reg. Ref. SD16A/0249 to amend floor layout incorporating an additional 3 no. apartment units.

The Council cite the following 4 no. refusal reasons in the Planner's Report:

1. *The proposed development, by reason of its poor quality design and configuration, would result in substandard accommodation and inadequate residential amenity for future occupants. In particular, having regard to:*
 - *the inadequate floor-to-ceiling heights,*
 - *the single aspect nature of all of the apartments,*
 - *the inadequate daylight and sunlight to living areas,*
 - *the poor internal layout,*

- *the substandard size and awkward configuration of some bedrooms,*
 - *the inadequate private amenity space for some apartments,*
 - *the proposed minimum-size studio units in a suburban location,*
 - *the proposed development would materially contravene the Housing policies and objectives as set out in the South Dublin County Development Plan 2016-2022, in particular policies H11 (Residential Design and Layout), H13 (Private and Semi-Private Open Space) and H14 (Internal Residential Accommodation). The proposal would also fall significantly short of the quantitative and qualitative standards set out in 'Sustainable Urban Housing: Design Standards for New Apartments' (2015), and 'Quality Housing for Sustainable Communities' (2007). As such, the proposal would not be in accordance with the proper planning and sustainable development of the area.*
2. *The proposed development of 48 residential units (12 units on each floor) on a site of 0.4566 hectares would result in a residential density of 106 dwelling units per hectare. Having regard to the substandard design and configuration of the proposed apartments, this density is considered to be excessive and would result in overdevelopment of the site and building.*
 3. *The proposed development would provide substandard living accommodation for future occupants of the building which would set an undesirable precedent for other similar developments, which would in themselves and cumulatively be harmful to the residential amenities of the area and would be contrary to the proper planning and sustainable developments of the area.*
 4. *Insufficient information has been submitted with regard to drainage issues. In particular no report or drawing indicating calculations of surface water attenuation required or to be provided on site has been submitted for the proposed development. Furthermore, Irish Water state that the existing 150mm foul drain is too small and should increase to 225mm as per Irish Water standards. Proposed drawings do not show the foul drain/sewer layout up to the point of connection to the public sewer. The proposed development does not comply with Irish Water Standards.*

Subsequent to the decision proposed by the Board, an appeal was lodged by the applicant in which the Board refused permission citing the following:

'The proposed development by reason of its design and layout would result in substandard accommodation and inadequate residential amenity for future residents. In particular, having regard to:

- *The inadequate floor to ceiling heights at ground and first floor level;*
- *The high percentage of single aspect units and*
- *The poor internal layout and, in particular, the substandard widths of the living rooms serving the 2 bed units;*

it is considered that the proposed development would be contrary to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018. The proposed development would thereby constitute a substandard form of development which would seriously injure the amenities of the area and be contrary to the proper planning and sustainable development of the area.'

Reg. Ref. SD18A/0285 Retention Permission and Planning Permission was granted on 9th of November 2018 for retention permission which was sought for alterations to the development permitted under SD16A/0249 and permission was sought for further alterations to the existing development to provide 37 no. residential units with terraces/balconies (25 no. 2 bed units and 12 no. 3 bed units) over 5 floors. Permission was also sought for modifications to permitted bicycle and bin stores at ground floor level and alterations to communal open space permitted under SD16A/0249. Vehicular access from Coldcut Road, car parking provision (42 no. spaces), landscaping and site services remain as permitted under SD16A/0249.

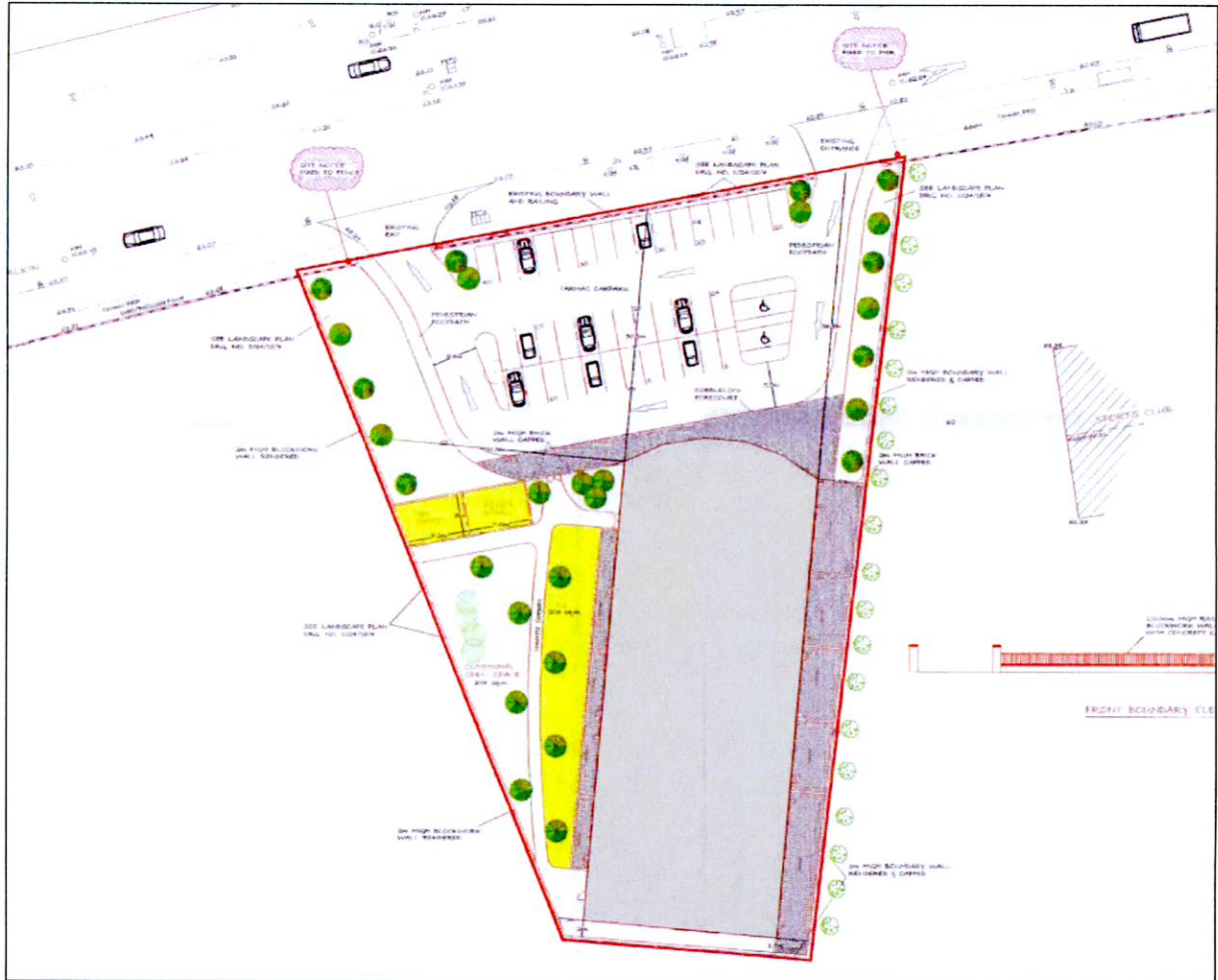


Figure 27.0 Proposed site layout plan granted under Reg. Ref. SD18A/0285.

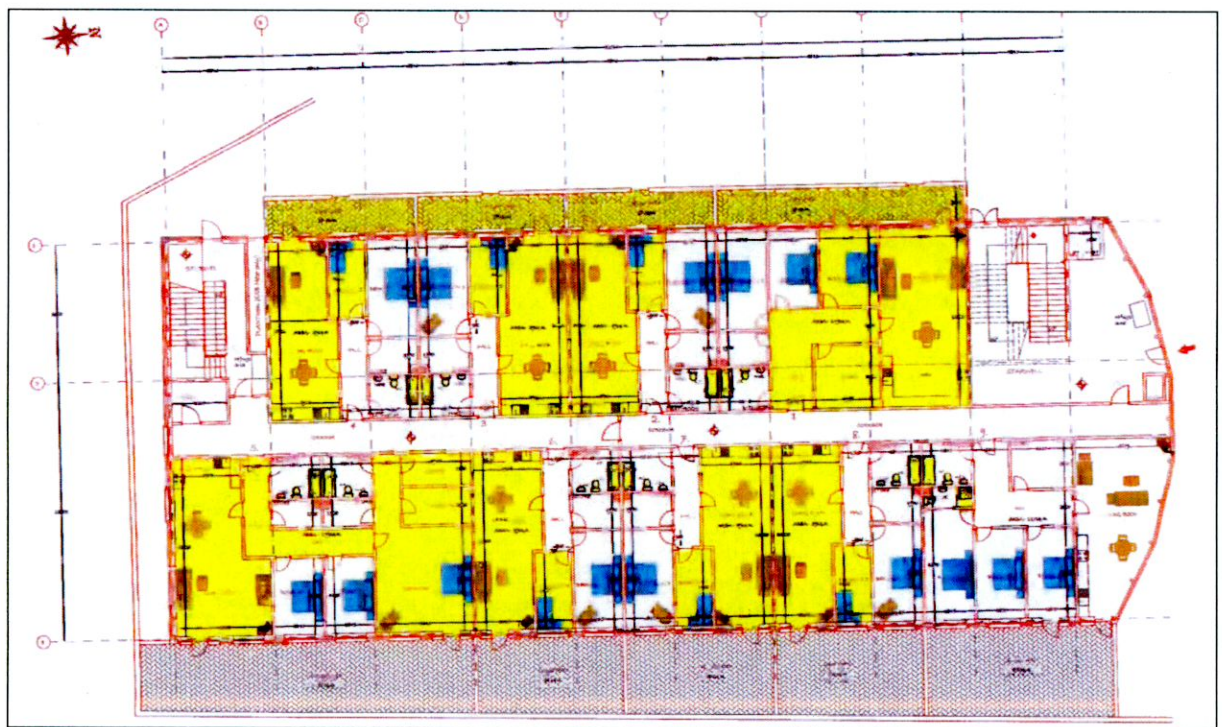


Figure 28.0 Ground floor plan granted under Reg. Ref. SD18A/0285.

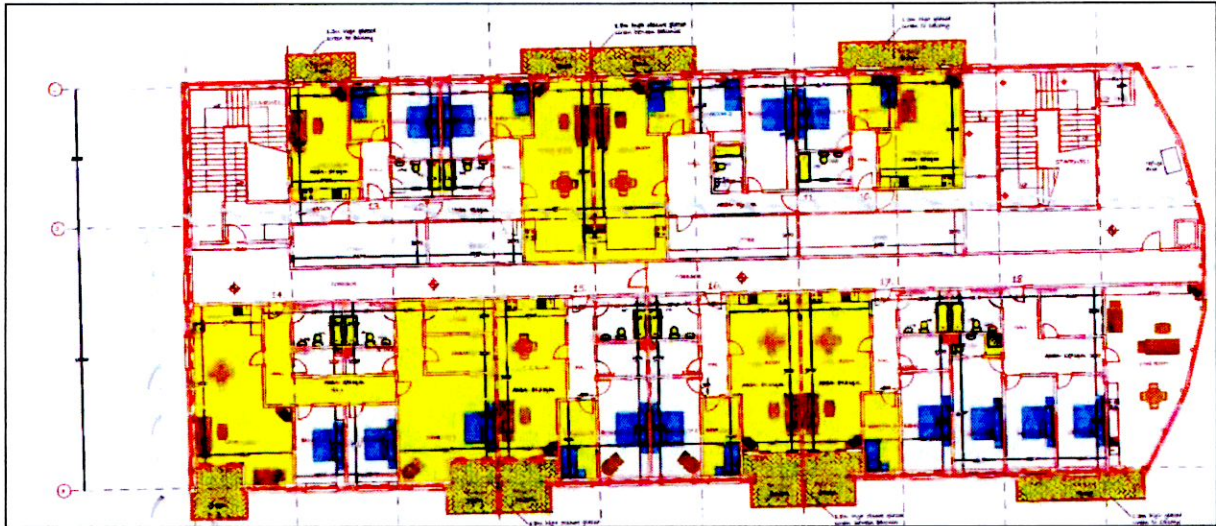


Figure 29.0 First floor plan granted under Reg. Ref. SD18A/0285.

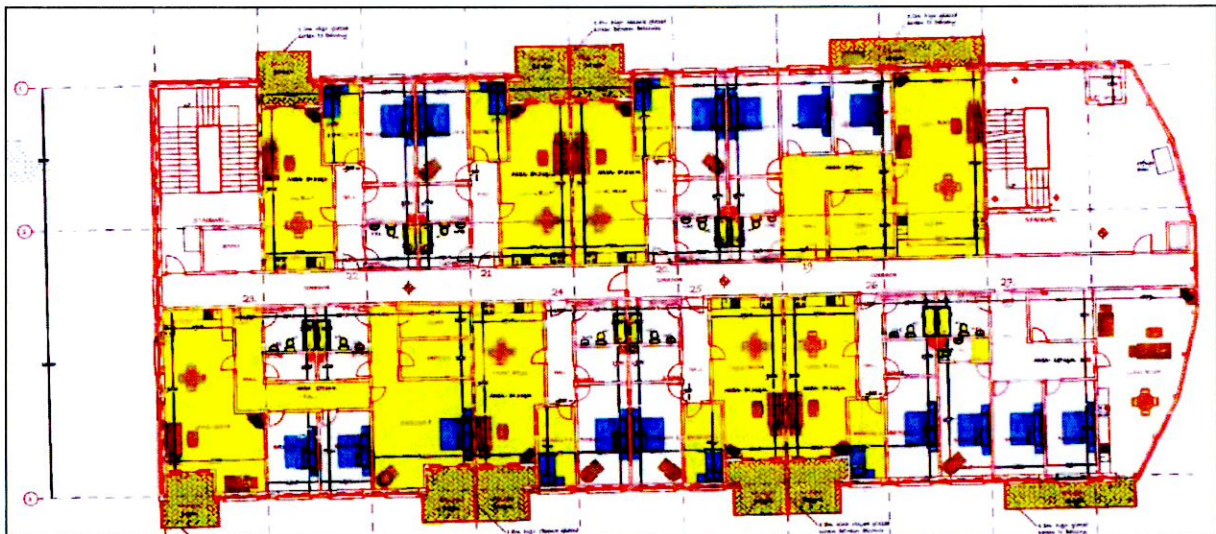


Figure 30.0 Second floor plan granted under Reg. Ref. SD18A/0285.

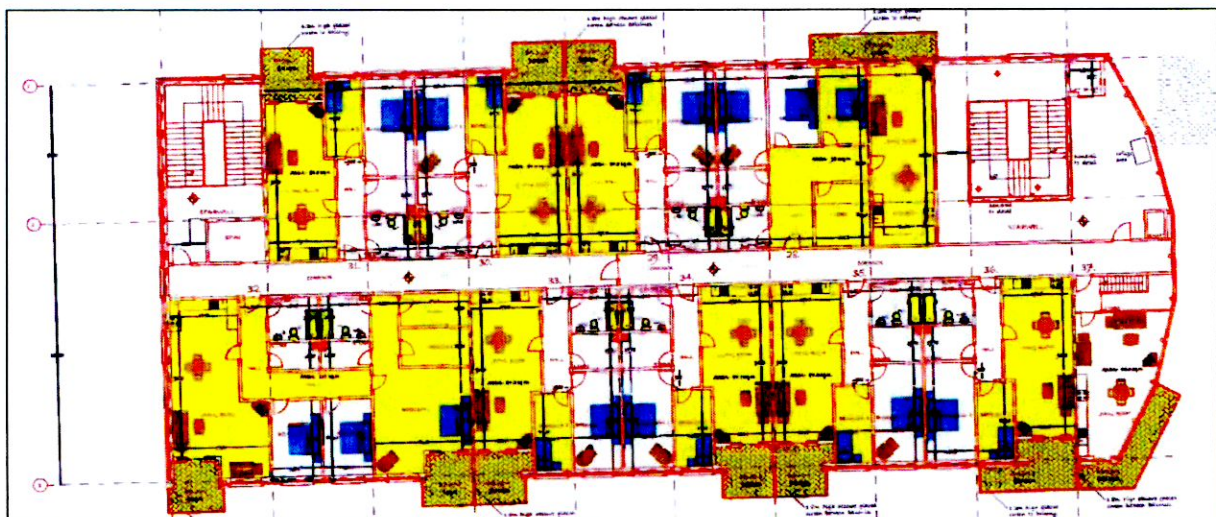


Figure 31.0 Third floor plan granted under Reg. Ref. SD18A/0285.

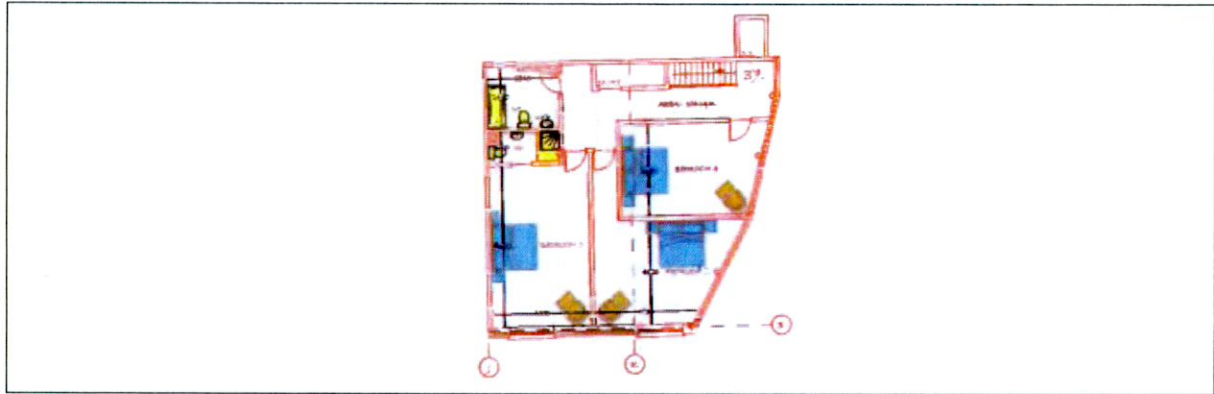


Figure 32.0 Fourth floor plan granted under Reg. Ref. SD18A/0285.

South Dublin County Council concluded in the Planner's Report that the retention and alterations proposed under this planning application would seriously injure the amenities of the area or of property in the vicinity. In addition, we note the following commentary in the Planner's Report for this permission:

'In light of the ongoing enforcement issues relating to the proposed development and in the interests of providing an adequate standard of residential amenity for the existing residents on site, it is considered necessary to limit the duration of this permission to 2 years and for a phasing programme for the proposed works to be agreed with the Planning Authority. This requirement will be dealt with by way of condition.'

Reg. Ref. SD20A/0117 A split decision was made on 20th of July 2020 for retention planning permission sought for 7 additional apartment units to that permitted under Reg. Refs SD18A/0285 and SD16A/0269 to provide for 44 units (3 studios, 1 one bed unit, 35 two bed units and 5 three bed units) in lieu of the permitted 37 apartment units with associated internal alterations to accommodate same within the existing 4-5 storey building, known as Larkfield House. Planning permission was sought for elevation treatments to include balconies/terraces, revisions to the permitted layout (SD18A/0285 and SD16A/0269) to provide for 49 car parking spaces to be accessed from Coldcut Road, 18 bicycle spaces, landscaping including communal public open space, 1 playground, 1 ESB substation, boundary treatments and all associated site and engineering works necessary to facilitate the development.



Figure 33.0 Extract of proposed site layout granted under Reg. Ref. SD20A/0117.

Planning permission was granted on the above application with retention permission for the 7 no. additional apartment units being refused. Planning permission was refused under Reg. Ref. SD17A/0145 for 44 no. units total with 7 no. of those units being studio apartments. Under Reg. Ref. SD18A/0285, an internal layout incorporating 37 no. units was approved, however, the 7 no. studio units proposed and refused under Reg. Ref. SD17A/0145 were constructed.

The 7 no. units provided for galley kitchens, approximately 2.6m in width, with balcony/terrace access off the kitchen, windows to bedrooms, and no windows in the living room area. The Council considered this to result in '*substandard accommodation and inadequate residential amenity for future residents, having regard to the poor internal layout*' citing the 2018 Apartment Guidelines and stating that direct sunlight for some part of the day would not be possible for living rooms due to the internal layout.

Further to this, the Council granted permission for the provisions of 49 car parking spaces, 18 bicycle spaces, landscaping to include communal private open space and 1 no. playground, an ESB substation, alterations to boundary treatment, and all associated site and engineering works necessary to facilitate the permitted elements of the proposed development subject to conditions. In addition, planning permission was limited to the duration of 2 no. years.

4.0 Proposed Development

The proposed development is for the internal alteration of the existing residential units, at Larkfield House, to improve the overall standard of accommodation offered onsite. The proposal comprises the installation of an increased area of private amenity space to each apartment, internal alterations to the layout of all apartments to increase storage provision and improve daylight access, amalgamation of apartment no's 22 and 23 at second floor level to create 1 no. 3-bedroom (6 person) apartment, and amalgamation of apartment no's 33 and 34 at third floor level to create 1 no. 2-bedroom (4 person) apartment.

Retention permission and planning permission is sought for alterations to previously approved development (Reg. Refs. SD16A/0249 and SD18A/0285) comprising retention of 5 no. additional units and permission for internal alterations including amalgamation of unit nos. 22 and 23, and unit nos. 33 and 34, to completely omit studio apartments from the development. The internal alterations include provision of additional storage, reconfiguration of apartment no. 15 resulting in the living space opening onto a balcony of 6 sqm.

The amalgamation of apartment units on the second and third floor improves the standard of accommodation offered here through the provision of 1 no. 3 bed unit and 1 no. two bed unit with large open plan kitchen / living / dining space, with the private balcony ensuring natural light floods into these units and reaches all aspects internally. The new 3-bedroom apartment at second floor level (Apt. 22) provides for 145 sqm living space which opens onto a private balcony with an area of 9 sqm. The proposed 2-bedroom apartment at third floor level (Apt. 32) provides for 125 sqm living space which opens onto a private balcony with an area of 7 sqm. The revised scheme does not provide for any studio units and only provides for 2 no. 1 bed units.

Additional storage is proposed to the adjoining living space of apartment nos. 02-10 and 16, whilst internal storage is centrally proposed in bedrooms of unit nos. 17-20, 22-25, 27-30, 33-35, and 37-41. The internal storage, provided along the adjoining living spaces within units nos. 02-10 and 16, has slightly reduced the depth of the living spaces to 9 metres to ensure adequate daylight reaches all aspect of the internal living space. It is proposed to provide the remaining units with additional storage to ensure compliance with the minimum requirements set out in *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)*.

The galley kitchens provided in Apartment Type B and Apartment Type E have a minimum width of c. 3.17 metres throughout. This assists with providing the apartments with an adequate level of daylight throughout the living spaces.

The revised design prepared by HA Design Studio ensures that each unit is facilitated with adequate private amenity space, whilst ensuring the internal daylight access is maximised throughout. The results of the daylight analysis prepared by H3D indicate that each unit meets and/or exceeds the minimum requirements for internal daylight access. The provision of private amenity space in the form of balconies and terraces, along with additional internal storage and revised internal layouts, ensures that a high standard of accommodation is being provided throughout.

Figures 34.0 – 44.0 below indicating the proposed development, with the proposed changes outlined with a red dashed line.



Figure 34.0 Proposed site layout plan.



Figure 35.0 Proposed ground floor plan.



Figure 36.0 Proposed first floor plan.



Figure 37.0 Proposed second floor plan.



Figure 38.0 Proposed third floor plan.

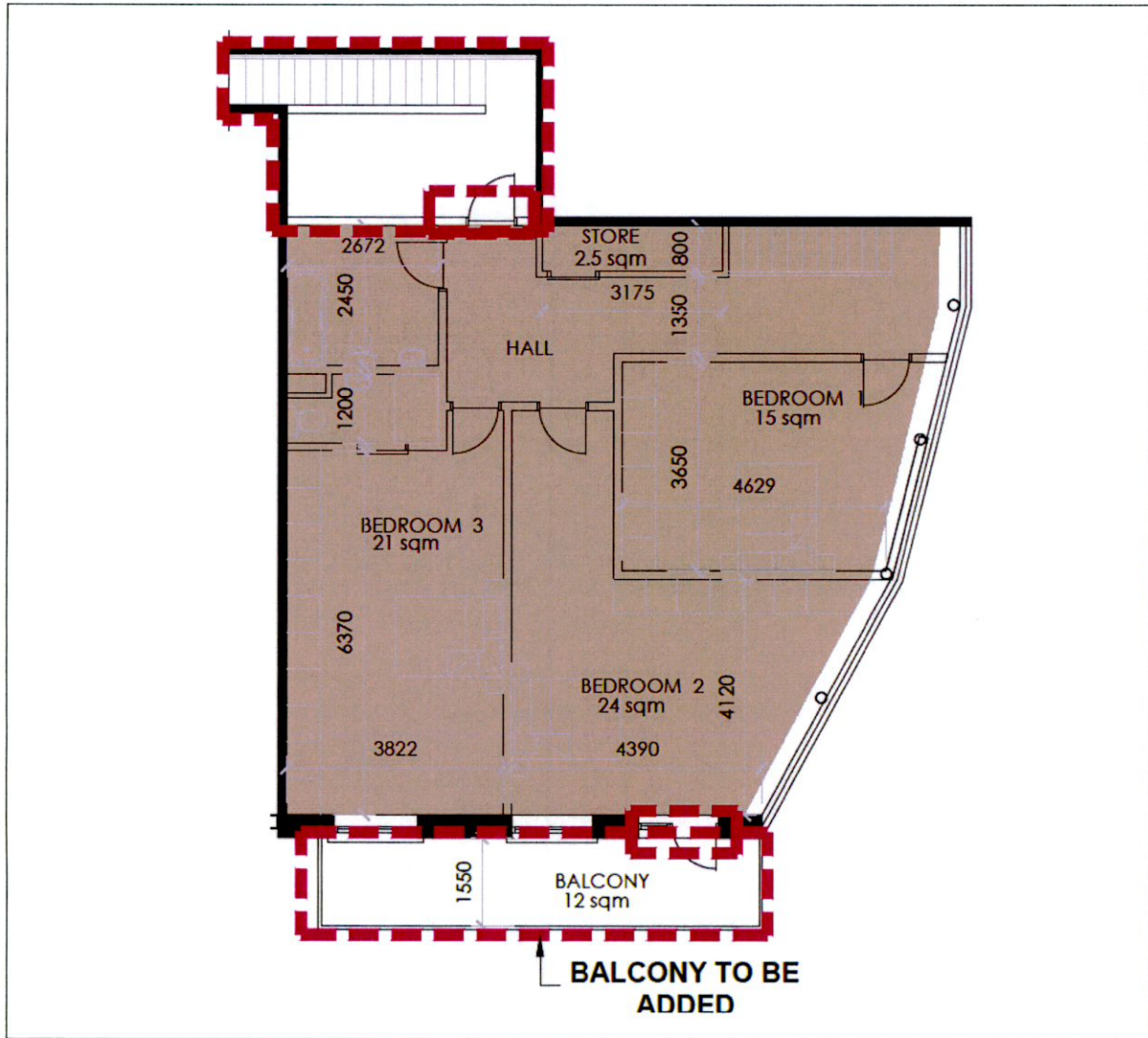


Figure 39.0 Proposed fourth floor plan.

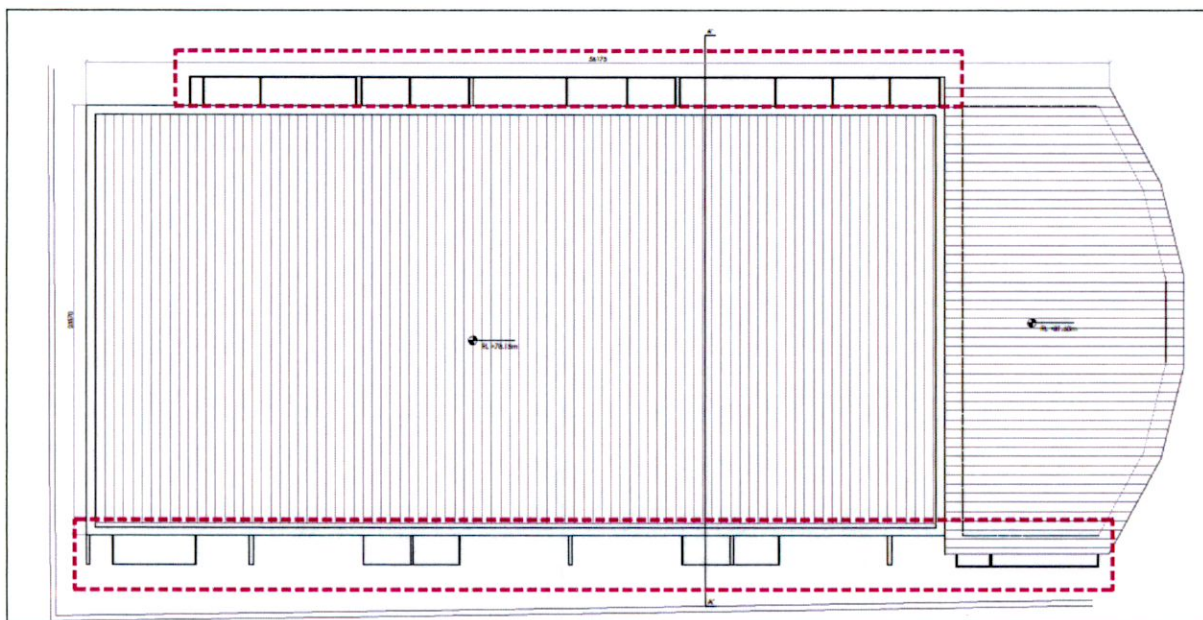


Figure 40.0 Proposed roof plan.

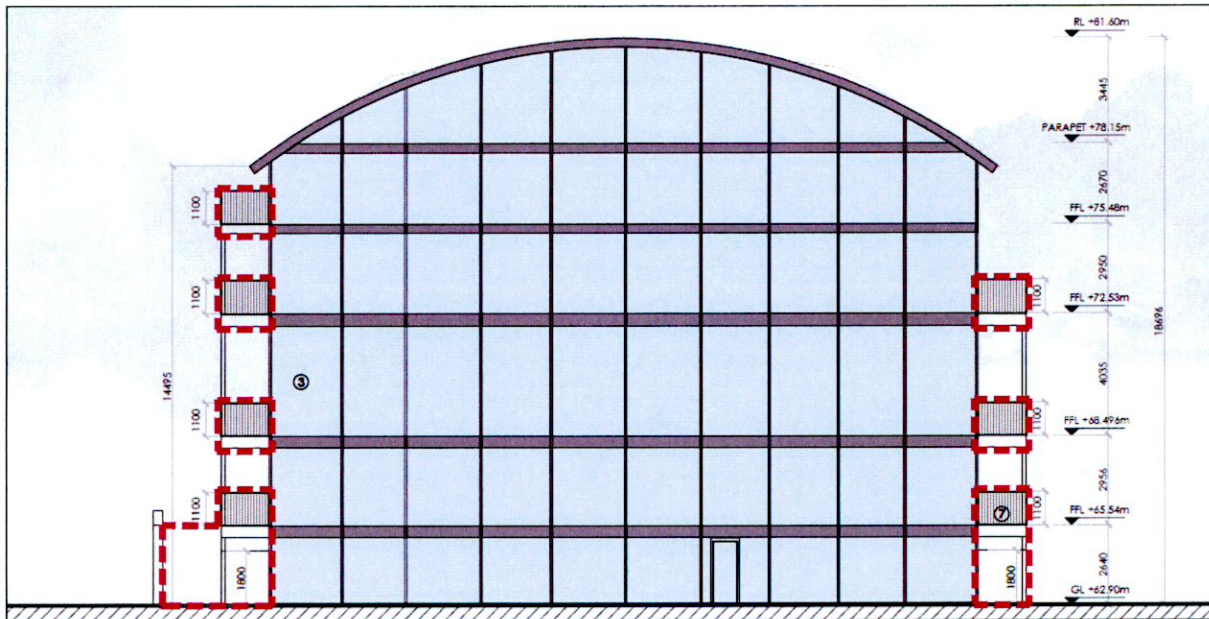


Figure 41.0 Proposed front elevation.

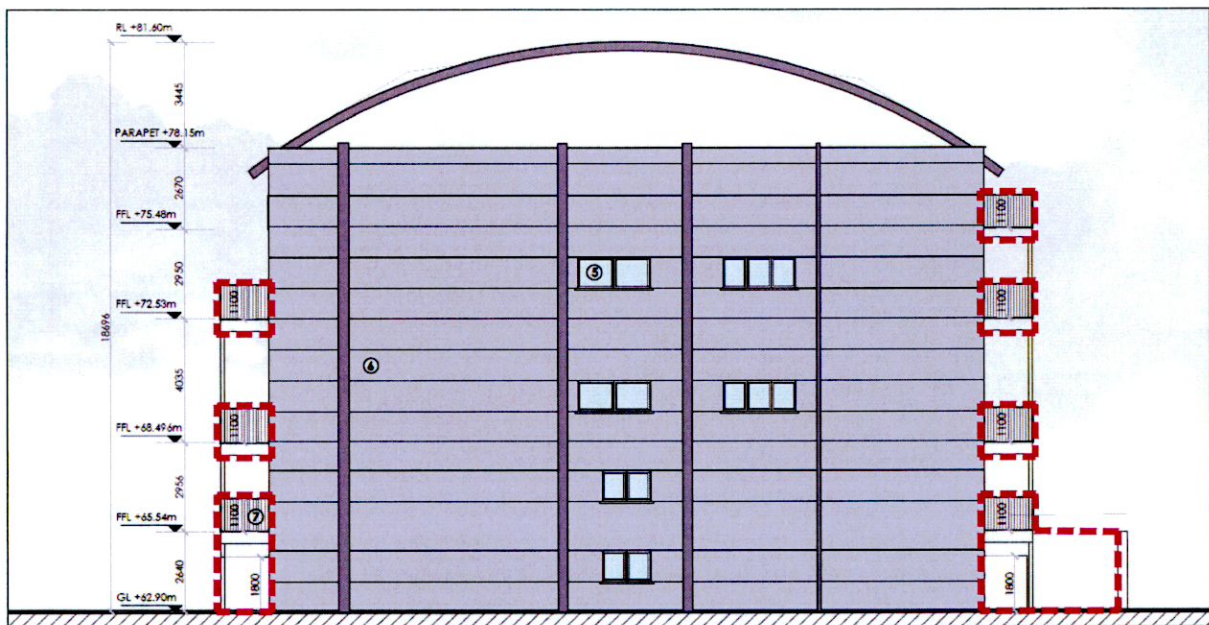


Figure 42.0 Proposed rear elevation.



Figure 43.0 Propose side (east) elevation.



Figure 44.0 Proposed side (west) elevation.

4.1 Response to Refusal Reasons

The previous proposal, under Reg. Ref. SD20A/0117, was refused for retention permission of 7 no. units with the following 2 no. reasons cited in the Planner’s Report:

1. *The proposed development, by reason of its poor-quality design and configuration, would result in substandard accommodation and inadequate residential amenity for future occupants. In particular, having regard to:*
 - *the poor internal layout,*
 - *the single aspect nature of the apartments,*
 - *the inadequate daylight and sunlight to living areas,*
 - *the proposed studio units in a suburban location,*
 - *the proposed development would materially contravene the Housing policies and objectives as set out in the South Dublin County Development Plan 2016-2022, in particular policies H11 (Residential Design and Layout), and H14 (Internal Residential Accommodation). The proposal would also fall significantly short of the quantitative and qualitative standards set out in Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018), and ‘Quality Housing for Sustainable Communities’ (2007). As such, the proposal would not be in accordance with the proper planning and sustainable development of the area.*

2. *The proposed development would provide substandard living accommodation for future occupants of the building which would set an undesirable precedent for other similar developments, which would in themselves and cumulatively, be harmful to the residential amenities of the area and would be contrary to the proper planning and sustainable development of the area.*

It is submitted that several measures have been implemented in this scheme to improve the overall standard of accommodation on site. The proposed development does not provide for any studio units, instead proposes 2 no. one-bedroom units, 34 no. two-bedroom units and 6 no. three-bedroom units; the depth of the proposed apartments has been slightly reduced to ensure a sufficient level of daylight and sunlight to living areas; the scheme has been assessed by daylight specialists, H3D, to ensure that all living spaces receive adequate levels of daylight; each apartment is to be facilitated with adequate private amenity space in the form of a balcony/terrace; the storage provision has increased where an inadequate level was previously proposed. The following sections of this report will provide a justification for the proposed development.

5.0 National and Regional Planning Context

This section outlines the national and local planning policy framework relevant to the development of the subject site.

5.1 Project Ireland 2040 – National Planning Framework

The Project Ireland 2040 - National Planning Framework seeks more balanced and concentrated growth, particularly within the five major cities in Ireland and encourages 50% of overall national growth to occur between them.

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seek to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas as per the following commentary from Project Ireland 2040 document:

'A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'.

Moreover, we note the following national policy objectives as per Project Ireland 2040:

National Policy Obj. 3a *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

National Policy Obj. 3b *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*

National Policy Obj. 35 *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

The proposed development is consistent with the above as it comprises development on underutilised land which is in close proximity to a number of public transport services. The proposal seeks to achieve a number of the County Development Plan's objectives and policies through the provision of high-quality residential units providing housing within the local area. The proposed development would see a significant improvement to the standard of accommodation available onsite. The existing building was subject to a change of use under Reg. Ref. SD16A/0249 and was further altered under Reg. Ref. SD18A/0285, where 37 no. units were approved. The proposed development under this application seeks to increase residential accommodation provided on site to 42 no. units. The proposal represents a development which is in line with the objectives of local and national policy to develop in existing built-up areas and making better use of under-utilised land and buildings. The additional 5 no. units proposed under this application would add to the much need housing stock.

5.2 Project Ireland 2040 - National Development Plan 2021-2030

The National Development Plan 2021-2030 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein.

'By 2040 the population of Ireland is expected to reach almost 6 million with a need for 550,000 more homes and the creation of 660,000 additional jobs to achieve and maintain full employment. The need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year'.

This development is considered to help in meeting the targets and objectives of the National Planning Framework through the more efficient use of an underutilised site within the existing built-up area in Dublin. The proposed development is considered to reflect the type of sustainable development which is sought throughout National Policy in regard to the appropriate development of under-utilised sites.

5.3 Regional Spatial and Economic Strategy for the Eastern and Midland Region (June 2019)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) replaced the Regional Planning Guidelines (RPGs) in June 2019. The RSES supports the implementation of national government policies such as the National Planning Framework (NPF) and also sets the framework for local economic development and spatial planning in the Eastern and Midland Region.

The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions. The RSES promotes the consolidation and intensification of lands within the built-up area of Dublin. The following regional policy objectives are noted:

RPO 3.3 *Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

RPO 4.3 *Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.*

Dublin plays a key role in attracting internationally mobile talent and investment and combines vibrant urban living, a rich heritage and character and access to nature. The Metropolitan Area Strategic Plan (MASP) in Chapter 5 sets out a strategy to achieve growth of 1.4 million people in Dublin City, Dublin suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031 through the delivery of large-scale strategic development areas.

The intensification of the site to provide for additional residences at a greater density within an established and well served area is considered to be in accordance with the RSES.

5.4 Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)

According to the South Dublin County Development Plan 2022-2028 the design and layout of individual dwellings should provide a high-quality living environment for residents. Dwellings should provide adequate room sizes that create good quality living spaces and designers should have regard to the targets and standards set out under *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)* with regard to minimum room sizes, dimensions and overall floor areas.

The aim of the guidelines is to identify the primary principles and criteria important to the design of housing and to highlight specific design features, requirements and standards. The document makes reference to infill development and states that, 'infill developments and urban redevelopment projects should respect the character of the existing neighbourhood'. In relation to the main considerations regarding infill development, the guidelines state the following:

'It is important to recognise the existing character, street patterns, streetscapes and building lines of an area, particularly in the case of infill sites or where new dwellings will adjoin existing buildings' and that 'the degree to which they will impact on any new development will need to be taken into account in assessing the development potential of any proposed site'.

Additionally, Section 5.9 (i) of these Guidelines state the following:

'Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas,

whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area. The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e., views, architectural quality, civic design etc.'

In relation to infill residential development, it is noted in Section 5.9.1 that:

'a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill' and the design approach 'should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area'.

It is submitted that this proposal makes efficient use of underutilised land suitable for infill development, within an area that is characterised by residential development. Furthermore, it is considered that the scale, density, and design of the proposed development is sufficient to protect neighbouring amenities. The siting and design of the proposed development within the site is sensitive to the surrounding streetscape and character of the area with the proposal responding to the topography of the site and adjacent open space areas associated with abutting residences.

5.5 Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)

In addition, and in respect of the apartment development, all apartments shall accord with or exceed the open space and floor area standards set out in *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)*.

On the basis of the above, the following section provides an assessment against each of the applicable standards as outlined in the above-mentioned guidelines.

5.5.1 Housing Mix

The following guidance is provided in relation to housing mix:

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA) that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan.

Further to this, the table below shows the permitted and amended unit mix for the overall development:

Permitted Development			Current Application	
Unit Type	No. of Units	Percentage	No. of Units	Percentage
Studio	0	0.00%	0	0.00%
One Bed	0	0.00%	2	4.76%
Two Bed	25	67.57%	34	80.95%
Three Bed	12	32.43%	6	14.29%
Total	37	100.00%	42	100.00%

Table 1.0 Permitted Unit Mix under Reg. Ref. SD20A/0117 vs Proposed Unit Mix

The Council strives for the dwelling mix in a residential scheme to provide for a balanced range of dwelling types and sizes to support a variety of household types. The following South Dublin County Council Development Plan 2022-2028 objective is relevant to the proposed development in this regard:

H1 Objective 3 *To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.*

QDP10 Objective 1 *To ensure that all new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.*

The proposed development provides for 42 no. units in total, with the breakdown of units as follows: 2 no. 1-bedroom apartments, 34 no. 2-bedroom apartments (20 no. 2B/4P and 14 no. 2B/3P) and 6 no. 3-bedroom apartments. On the basis of SPPR 1, it is considered that the proposed unit mix is acceptable. South Dublin County Council previously refused permission under Reg. Ref. SD20A/0117 on the basis of provision of studio units in a suburban location, therefore under this application there are no studio units proposed.

5.5.2 Dual Aspect Ratios

With respect to dual aspect ratios, we note that this building was subject to a change of use under Reg. Ref. SD16A/0249, where the existing leisure centre was changed to residential. The Planning Authority accepted that the 50% dual aspect requirement was not met under SD18A0285 on the basis that it was a refurbishment of an older building, that the floor areas of the apartments granted exceeded minimum standards. The proposed layout and design under this application resembles that granted under the 2018 permission. Internal alterations proposed ensure good internal layout that maximises internal daylight access. The proposed development provides for 6 no. dual aspect units which equates to 14% of the scheme. The provision of east and west facing units has been maximised where units are single aspect.

Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

Regarding the SPPR4 above, we note that Planning Authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined on a case-by-case basis subject to the achievement of overall high design quality in other aspects. Given that the development comprises the conversion of an existing building on site it would not be possible to achieve 50% dual aspect. However, it is noted that the Guidelines state that the 50% dual aspect requirement may be relaxed where it is possible to refurbish an older building.

5.5.3 Minimum overall apartment floor areas

The overall apartment floor area sizes required for apartment units outlined in the 2018 Guidelines are as follows:

- *Studio apartment (1 person) 37sq.m*
- *1-bedroom apartment (2 persons) 45sq.m*
- *2-bedroom apartment (3 persons) 63sq.m*
- *2-bedroom apartment (4 persons) 73sq.m*
- *3-bedroom apartment (5 persons) 90sq.m*

All apartments in the proposed development comply with and exceed the required minimum standards outlined in the 2020 Guidelines. This section outlines the proposals compliance with the required standards; however, we also refer to the Proposed Area Schedule as prepared by the project architects, HA Design Studio, which further outlines the proposals compliance with the requirements.

Minimum Overall Floor Areas		
Unit Type	Requirement	Proposed
One Bedroom	45 sqm	58 sqm – 73 sqm
Two Bedroom (3P)	63 sqm	88 sqm – 91 sqm
Two Bedroom (4P)	73 sqm	85 sqm – 125 sqm
Three Bedroom	90 sqm	113 sqm – 145 sqm

Table 2.0 Table indicating the required overall floor area for apartments, with the proposed floor areas at Larkfield House.

5.5.4 Minimum Width for Main Living/Dining Rooms

Minimum Width for Living/Dining Rooms		
Unit Type	Requirement	Proposed
One Bedroom	3.3m	3.9m – 5.6m
Two Bedroom (3P)	3.6m	3.9m
Two Bedroom (4P)	3.6m	3.9m
Three Bedroom	3.8m	3.9m – 6.9m

Table 3.0 Table indicating the minimum requirement for the width of living/dining rooms, with the proposed living/dining room widths at Larkfield House.

5.5.5 Private Amenity Space

Private Amenity Space		
Unit Type	Requirement	Proposed Private Amenity Space
One Bedroom	5 sqm	6 sqm – 8.3 sqm
Two Bedroom (3P)	6 sqm	9 sqm – 37.6 sqm
Two Bedroom (4P)	7 sqm	7 sqm – 12.6 sqm
Three Bedroom	9 sqm	9 sqm – 39 sqm

Table 4.0 Table indicating the required area for private amenity space, with the proposed private amenity space areas at Larkfield House.

5.5.6 Storage

Minimum Storage Space Requirements		
Unit Type	Requirement	Proposed Storage Space
One Bedroom	3 sqm	4 sqm – 18 sqm
Two Bedroom (3P)	5 sqm	9.7 sqm – 27 sqm
Two Bedroom (4P)	6 sqm	7 sqm – 12.6 sqm
Three Bedroom	9 sqm	9 sqm – 13 sqm

Table 5.0 Table indicating the required area of storage, with the proposed storage provision at Larkfield House.

5.5.7 Communal Open Space

Minimum Communal Open Space Requirements			
Unit Type	No. of Units	Communal Open Space Required	Required Per Unit Type
One Bed	2	5 sqm	10 sqm
Two Bed (3 Persons)	14	6 sqm	84 sqm
Two Bed (4 Persons)	20	7 sqm	140 sqm

Three Bed +	6	9 sqm	54 sqm
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Table 6.0 Minimum communal open space requirements per Table 3.21 of the South Dublin County Council Development Plan 2022-2028.

The subject scheme requires 288 sqm of communal amenity space. The development includes a total of 583 sqm of communal amenity space which is in excess of the requirements and development has been designed to ensure the open space areas serving the development receives adequate levels of sunlight to reach communal amenity space throughout the year. In addition, the communal area is proposed to be visible for all apartment units to provide for a sufficient passive surveillance while also staying accessible to all residents.

In response, we provide a Landscape Plan prepared by Casey Planning and Landscape Consultants, to accompany this planning application. The Landscape Plan provides comprehensive detailing of the proposed landscaping and treatment for the proposed development site.

5.6 Housing for All – A New Housing Plan for Ireland

The ‘Housing for All - A new Housing Plan for Ireland’ was published in September 2021 as part of the Irish Government’s ‘Our Shared Future’ programme which, in turn, sets out the Government’s mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has:

‘access to sustainable, good quality housing to purchase or rent at an affordable price, built to high standard, and located close to essential services, offering high quality of life.’

The plan seeks to increase new housing supply to an average of at least 33,000 new units per year with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- Supporting Homeownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock.

We submit that the proposal is consistent with the above policy as it provides additional residential dwellings on a zoned and serviced site. The provision of further residential units on site, in the manner proposed under this application, supports homeownership and affordability, and provides for the efficient use of zoned and serviced land. The proposed development responds to a recognised need, at national level, for residential accommodation and is consistent with policy in this regard.

5.7 Urban Design Manual – A Best Practice Guide

This best practice guide is based around twelve questions that have been compiled to summarise the full range of design considerations for residential development such as that proposed on the development site. These questions are ‘a distillation of current policy and guidance and tried and tested principles of good urban design’. The Urban Design Manual highlights the need for higher densities in order to:

‘create more compact settlement patterns that help to support walking and cycling’.

The proposal has incorporated the 12 no. criteria that has been set out within The Urban Design Manual and has submitted a well-designed and sensitive proposal that provides for a residential unit in an underutilised site in an established mature residential area, served by a high standard of public transport whilst also proximate to a number of services within both walking and cycling distance.

6.0 South Dublin County Development Plan 2022-2028

The South Dublin County Development Plan 2022-2028 is the relevant statutory development plan which guides the use and development of the application site.

6.1 Zoning

The development site is zoned 'OS' - Open Space, in the South Dublin County Development Plan 2022-2028, with the objective *'to preserve and provide for open space and recreational amenities.'*

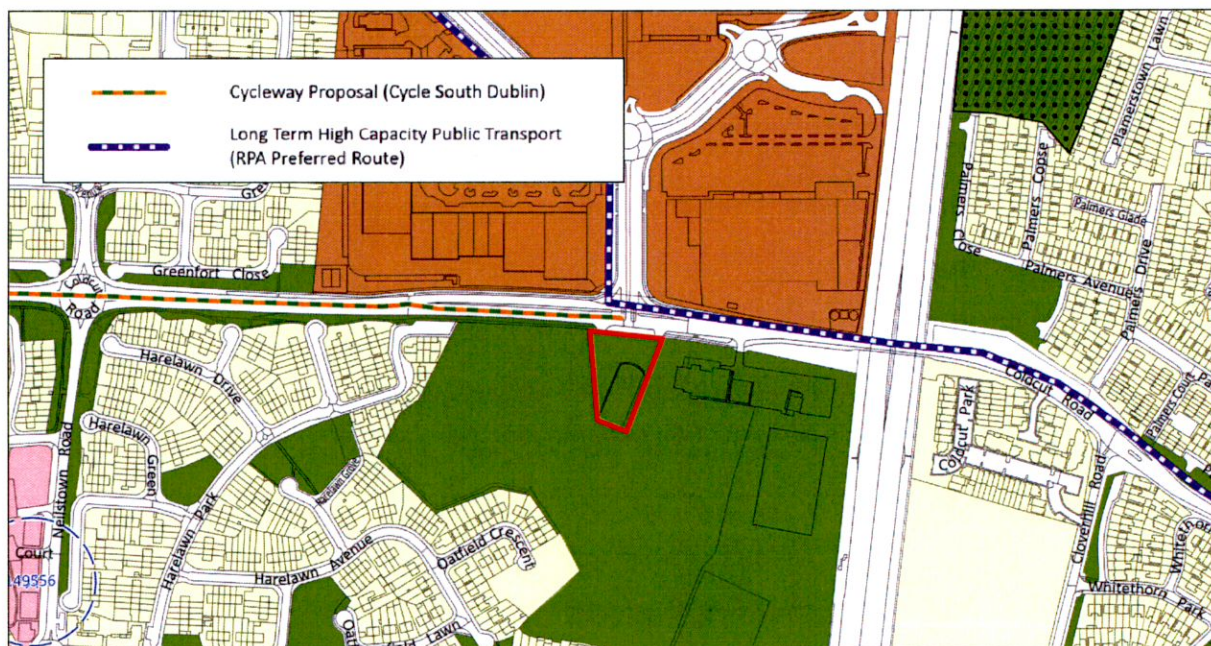


Figure X.0 Extract from South Dublin County Development Plan 2022-2028 Zoning Map (Sheet no. 2) with the application site outlined in red.

The County Development Plan outlines uses which are permitted in principle and open for consideration on 'OS' zoned land. Permitted in principle uses are generally acceptable subject to normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the plan. Land uses that are listed as 'open for consideration' may be acceptable to the Planning Authority subject to detailed assessment against the principles of proper planning and sustainable development, and the relevant policies, objectives and standards set out in the Development Plan.

Permitted in Principle

'Allotments, Community Centre, Cultural Use, Open Space, Recreational Facility, Sports Club/Facility'

Open for Consideration

*'Agriculture, Bed & Breakfast, Camp Site, Carpark, Cemetery, Childcare Facilities, Crematorium, Education, Garden Centre, Guest House, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Outdoor Entertainment Park, Place of Worship, Public Services, Recycling Facility, **Residential***, Restaurant/Café, Shop-Local, Stadium, Traveller Accommodation.'*

* Only where this accords with H3 Objective 4

Whilst we note that residential use is 'open for consideration', and the principal of residential development has been established at the subject site through the change of use from leisure centre to residential under planning Reg. Ref. SD16A/0249 and further with permission granted under Reg. Ref. SD18A/0285. The objective of this proposal is to improve the standard of accommodation available on site.

It is considered that the proposed development is in accordance with the zoning objectives of the 'OS' Zone. The current use of land is residential, and this land use is 'Open for Consideration' in lands under this zoning objective. As such, the proposed development of the site intends to maintain this land use and through the development seeks to achieve a number of the County Development Plan's objectives and policies through the provision of high-quality residential units providing housing for the local area. The residential use does not negatively affect the zoning objectives for the site, and it is consistent with

the policies and objectives of the Development Plan. The use of the current building will remain as residential and seeks retention of the alterations made to the internal layout of the building on the site, therefore would not have an adverse impact on the surrounding environment and thereby maintaining its current contribution in terms of housing goals as set out in the South Dublin County Development Plan 2022-2028. Further to this, it is intended that in submitting the application with an extensive landscape proposal the development will further accord with goals of the 'OS' zoning objective.

6.2 Core Strategy & Settlement Strategy

Set out in Chapter 2 of the South Dublin County Development Plan 2022-2028, the 'Core Strategy and Settlement Strategy' outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels.

Larkfield House is identified as a 'Dublin City and Suburbs' in the South Dublin Settlement Hierarchy and are described as follows:

'International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.'

The following policies and objectives are outlined in relation to 'Dublin City and Suburbs':

CS6 Objective 3 *To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).*

CS6 Objective 5 *To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and to existing developments which need them.*

Further to this, Section 6.2 of the Development Plan states that the Core Strategy, Chapter 2, acknowledges capacity for additional housing units within the lifetime of the Plan period. The following 'Housing' policy objective is also relevant to the proposal:

H2 Objective 2 *To ensure that sufficient zoned land, integrating land use and transport and which can be serviced is available at appropriate locations to satisfy the housing requirements of the County and to support and facilitate the development of housing lands based on the Settlement Strategy outlined in Chapter 2: Core Strategy and Settlement Strategy.*

The proposed development will provide for the compact growth of an existing residential site that is zoned and is served by its suitable location. The subject site is near a variety of transportation routes like the M50 motorway and N4, public transport services including bus routes and DART stations less than 2km away, and is adjacent to Liffey Valley Shopping Centre, Clondalkin. It is submitted that the proposed development is therefore in accordance with the objectives of the 'Core Strategy and Settlement Strategy' as set out in the South Dublin County Development Plan 2022-2028.

6.3 Housing

The vision for housing in the South Dublin County Council administrative area is to 'ensure the delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County.' Developments should comply with Government guidance in terms of design and sustainability, adaptability and where adequate private amenity open space and public open space is provided with passive surveillance. The proposal would significantly improve the standard of accommodation provided at the subject site, maximising access to internal daylight and ensuring adequate private amenity space provision. It is therefore considered that the following policies are particularly relevant to the proposal on the subject site:

6.3.1 Housing for All

The South Dublin Development Plan 2022-2028 calls for greater planning for a variety of housing needs in Section 6.3 – ‘Housing for All’. The overarching policy is to ‘support the provision of accommodation for older people and people with disabilities and / or mental health issues within established residential and mixed-use area offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.’ The following policy is relevant to the proposal as it is a residential development on lands zoned ‘OS’.

H3 Objective 4 *To support community led housing developments for older persons and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open space is deemed to be adequate and the amenities of the area are preserved.*

It is considered that due to the site having an existing and established residential use on site, it is in compliance with the above land use objective.

6.3.2 Quality of Residential Development

The Development Plan states that ‘good quality housing is key to the delivery of successful and sustainable neighbourhoods’. Section 6.7.1 – ‘Residential Design and Layout’ relates to guidelines established under *The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DHPLG (2009)* in which standards have been established in relation to the provision of private open space, dwelling unit sizes, privacy and aspect additionally set out in Chapter 12 of the Development Plan. The overarching policy is to ‘promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standards of individual dwelling units and the overall layout and appearance of the development.’ The following policy objectives are relevant to the proposal:

H7 Objective 1 *To promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development in accordance with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020), or as may be updated and Chapter 12: Implementation and Monitoring.*

H7 Objective 4 *To ensure that residential development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013, updated 2019).*

The proposed development provides for additional residential amenities not permitted or previously constructed in previous years. The proposal, submitted with this application, now provided for additional storage space within each unit, private amenity spaces in the form of balconies or terraces, and a playground and communal public open space to along the eastern boundary of the development. In addition, the development now provides additional space for various units throughout the development as several units have been amalgamated to provide for three-bed units. As submitted, we find the proposed development to be consistent with established guidelines for sustainable residential development and provides for good quality housing.

6.3.3 Internal Residential Accommodation

Section 6.7.4 of the South Dublin County Development Plan 2022-2028 states that the goal of Policy H10 is to ‘ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.’ We find the following objectives to be of relevance to the proposal:

H10 Objective 1 *To promote the provision of high-quality houses and apartments / duplexes within sustainable neighbourhoods by achieving the appropriate quantitative and qualitative standards, in accordance with Ministerial Guidelines and as set out in Chapter 12: Implementation and Monitoring.*

H10 Objective 2 *To support the design of adaptable residential unit layouts that can accommodate the changing needs of occupants, through extension or remodelling subject to the protection of residential amenity.*

The proposal has been redeveloped in a manner that affords the alterations undertaken, thus proving to be adaptable. The proposed units exceed the minimum standards for same as per Table 3.21 of the Development Plan and therefore accommodate the space proposed – refer to Section 5.5 and 7.1 of this report for development plan standards, unit mix, and overall accommodation proposed.

6.3.4 Residential Consolidation

Policy H13 in Section 6.8.1 – ‘Infill, Backland, Subdivision and Corner Sites’ of the Development Plan has the goal to ‘promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County’. As the site can be categorised as a former infill / brownfield site, we find the following relevant to the proposed development:

H13 Objective 1 *To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.*

H13 Objective 5 *To ensure that new development in established areas does not unduly impact on the amenities or character of an area.*

The private amenity spaces of the apartment units exceed the Development Plan standards as well as the Apartment Guideline standards. Furthermore, it is proposed to provide additional communal open space areas at approximately 583 sq.m respectfully which over twice the required provision.

6.3.5 Quality Design and Healthy Placemaking

South Dublin County Council's vision for development in the area is ‘to create a leading example in sustainable urban design and healthy placemaking that delivers attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.’ Chapter 5 of the South Dublin County Council Development Plan 2022-2028 has due regard to ‘Quality Design and Healthy Placemaking’ as envisioned by the Council. It is considered that the following objectives within Chapter 5 are of particular relevance to this planning application:

QDP1 Objective 6 *To build residential neighbourhoods in a manner that aims to provide for adequate numbers of affordable homes in line with provisions set out in Goal 11 of the UN Sustainable Development Goals, the National Planning Framework and the Regional Spatial and Economic Strategy towards the delivery of long-term sustainable communities.*

The design of the existing development, inclusive of the proposed amendments, provide for an inclusive, safe, resilient, and sustainable neighbourhood in accordance with the NPF and RSES.

6.4 Development Standards for Residential Developments

6.4.1 Residential Density

It is noted that South Dublin County Council will have regard to the *Departmental Guidelines document Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)* when considering the appropriate density for residential schemes. As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high-capacity public transport facilities.

A density of c. 95 units per hectare is provided with the inclusion of the proposed 5 no. units. The site is situated along a 'Long Term High Capacity Public Transport' Corridor and 'Core Bus Route'. We note the following from the Planner's Report on the planning application submitted under Reg. Ref. SD20A/0117:

'The subject development would comprise an efficient use of this brownfield site located in close proximity to the Liffey Valley Shopping Centre which has a range of shops, restaurants, supermarket and leisure facilities and high frequency bus services.'

As submitted, we find that the proposed density level of c. 95 units per hectare is entirely appropriated for the proposed development of 5 no. additional units and the density proposed accords with all relevant strategic and statutory policy to make efficient use of brownfield sites.

6.4.2 Privacy and Security

Section 6.7.5 of the Development Plan related to Privacy and Security. Privacy and security help protect residential amenity, particularly in higher density schemes. As we are proposing additional density at the subject site, the following objectives are relevant to the proposal:

- H11 Objective 1** *To ensure there is a clear definition and delineation between private, semiprivate (communal) and the public open spaces that serve residential development.*
- H11 Objective 2** *To ensure that all developments are designed to provide street frontage and to maximise surveillance of streets and the public realm.*
- H11 Objective 3** *To ensure that private open spaces, where it consists of gardens, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. In limited circumstances, some discretion may be provided for where the configuration of the space can provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.*
- H11 Objective 4** *To ensure that opposing balconies and windows at above ground floor level have an adequate separation distance, design or positioning to safeguard privacy without compromising internal residential amenity.*

6.4.3 Access Cores and Communal Area

There are 3 no. criteria provided for 'Access Cores and Communal Areas' in Chapter 12 of the Development Plan.

- *Apartment schemes should seek to minimise the use of shared entrances, where possible, in favour of own door access at street level.*
- *Where shared access lobbies are proposed the number of units served by one entrance should be kept to a minimum.*
- *Projecting external staircases to access upper floors should be avoided as they can dominate the streetscape.*

It is submitted that, as built, the proposal has satisfied the above requirements for access cores and communal areas. The property provides for 2 no. interior staircase access areas, 1 no. interior staircase to the fourth-floor level, and 1 no. lift with exterior entrances to units on the ground floor. As minimal changes are proposed to the access areas, we find the proposed development to be suitable and in compliance with the original and subsequent grants of permission on the subject property.

6.4.4 Private and Semi-Private Open Space

Open space provision is crucial to sustainable development in the area. In schemes where their apartment units, similar to the proposed development, semi-private open spaces have potential to offer a range of active and passive uses for the residents. The goal idealized under, Policy H9: Private and

Semi-Private Open Space' of the Development Plan is to 'ensure that all dwellings have access to high quality private open space and semi-private open space (where appropriate) and that such space is carefully integrated into the design of new residential developments.' The following objective is relevant to the residential development subject to this application:

H9 Objective 1 *To ensure that all private open spaces for houses and apartments / duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out in Chapter 12: Implementation and Monitoring.*

In accordance with Chapter 12, 'Private Spaces' are subject to the following standards:

- *The quantum of private open space for apartments shall accord with Table 3.21.*
- *This space shall be provided in the form of patios / terraces, and balconies or roof gardens at upper levels and should be located to optimise solar orientation and designed to minimise overshadowing and overlooking.*
- *Balconies shall not overhang onto the public path in the interest of safety and must be set back.*
- *Balconies should adjoin and have a functional relationship with the main living areas of the apartment.*
- *In certain circumstances, glass-screened 'winter gardens' may be provided. A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the standards under Table 3.21.*
- *Where amenity space is proposed at ground level, it shall incorporate boundary treatments to ensure privacy.*
- *While private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and / or a 'privacy strip' between the two.*

As shown in Section 5.5.5 of this report and below, the private space amenity provided to each unit exceed apartment guidelines. In addition, the balconies subject to the retention permission of this application are inset, adjoin living spaces of the individual units, with at least 1.6 metre depths provided. At ground level, the proposal provides for enclosed terraces with wooden fencing for units along the western elevation and stated areas of 8.3 sq.m to 14 sq.m. The ground floor units along the eastern boundary have terraces adjoining the eastern boundary concrete wall areas ranging from 32.3 sq.m to 39 sq.m. The upper floors comprise balconies with areas ranging from 6 sq.m to 12.6 sq.m.

Further to this, 'Communal / Semi-Private Spaces' are subject to the following criteria:

- *High quality communal open space should also be provided in schemes that include apartments.*
- *Communal open spaces should form an integral part of scheme design, be screened from full public view and public access, and should be restricted through design and / or formal barriers.*
- *Communal amenity space within apartment and / or housing developments should be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block.*
- *The communal open space should be visible from, and accessible to, the maximum number of units within the proposed scheme.*
- *Inaccessible, hidden or otherwise back land communal open space, and narrow linear strips of communal open space will not be acceptable.*

In addition, Section 12.6.7 of the Development Plan provides the quantum of communal open space required for residential developments. This is further shown in Section 5.5.7 of this report.

Based on the above requirements, the subject scheme requires 288 sqm of communal amenity space.

The development includes a total of 583 sqm of communal amenity space which is in excess of the requirements and development has been designed to ensure the open space areas serving the development receives adequate levels of sunlight to reach communal amenity space throughout the year. In addition, the communal area is proposed to be visible for all apartment units to provide for a sufficient passive surveillance while also staying accessible to all residents.

6.4.5 Clothes Drying Facilities

The 'Clothes Drying Facilities' portion of Section 12.6.7 – 'Residential Standards' states that clothes drying facilities 'should be provided for apartments developments in the form of suitably sized communal facilities or individual facilities within each unit'.

As built the residential development provides for individual facilities within each unit comprising a washer / dryer unit. Therefore, the development complies with the above residential standard.

6.4.6 Car Parking Standards

South Dublin County Development Plan 2022-2028 highlights the need for a balanced approach to car parking management and that parking provision is based on the level of public transport accessibility. The Council manages car parking by way of development standards in Section 12.7.4 of the Development Plan. Car parking is divided into two main categories:

Zone 1: General rate applicable throughout the County;

Zone 2 (Non Residential): More restrictive rates for application within town and village centres, land zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 800 metres of a train or Luas station and within 400 – 500 metres of a high quality bus service (including proposed services that have proceeded to construction), and;

Zone 2 (Residential): More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield / infill sites within Dublin City and Suburbs settlement boundary within 400 – 500 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service).

Under the most recent application submitted to the Council, the parking rates were calculated using the Zone 1 categorisation. We will apply that same standard in our calculations provided in the table below:

Maximum Parking Rates (Residential Development)			
Unit Type	No. of Units	Zone 1	Required Spaces
One Bed	2	1 space	2 spaces
Two Bed	34	1.25 space	42.5 spaces
Three Bed +	6	1.5 spaces	9 spaces

Table 7.0 Maximum Parking Rates (Residential Development) per Table 12.26 of the Development Plan. This table shows that the maximum number of car parking spaces for the proposed development is 53.5 spaces.

In considering the above findings, the proposal for 50 no. car parking spaces inclusive of 3 no. disabled spaces is below the maximum parking rates in the County. Therefore, we consider to the proposal to be satisfactory with Development Plan and South Dublin County Council standards.

6.4.7 Bicycle Parking

The South Dublin County Development Plan 2022-2028 requires that developments provide for cycle facilities in accordance with the *National Cycle Manual, NTA (2011)* and quantum of cycle parking required set out in Chapter 12: *Implementation and Monitoring*, Bicycle Parking Standards of the Development Plan. Section 12.7.1 of the Development Plan includes Table 12.23 which provides for criteria and Minimum Bicycle Parking / Storage rates for all new development in the County. In addition, long stay parking spaces are defined as bicycle parking spaces for use by residents. The Development Plan states that these spaces should be 'located in a secure area that is not freely accessible to the general public'.

The minimum parking requirements for residential apartments are to be 1 per bedroom according to the South Dublin County Development Plan 2022-2028. Thus, we submit a proposal for 110 bicycle parking spaces is compliant with the 2022-2028 Development Plan standards and exceeds the bicycle parking requirement of 18 no. spaces, observed in the planning permission granted under Reg. Ref. SD20A/0117. We consider this level of bicycle parking proposed to be appropriate in this instance given the car parking provision on site and the subject sites proximity to public transport services.

7.0 Services

The Engineering Report, prepared by TENT Engineering, details the proposed services which will service the development. The following section will provide a brief summary.

7.1 Foul Water

It is proposed that the development would be served off the same connection that currently services the site. The foul water network is not proposed to be combined with the surface water network either on-or off site. Please refer to Engineering Report submitted with this application for Foul Water details.

7.2 Surface Water

The proposed surface water drainage is to be discharged into the proposed soakaway. It is submitted that the surface water contribution into the existing surface water sewer network, discharge rate, flow and system capacities are deemed acceptable in the proposed drainage layout.

7.3 Water Supply

It is proposed that the development would be served off the same connection that currently services the site. Refer to the Engineering Report prepared by TENT Engineering and submitted with this application for further details on the water supply proposal.

8.0 Appropriate Assessment

The application site is not connected with any European Natura 2000 sites and is considered that there will be no negative impacts on any protected sites arising from the proposal.

9.0 Daylight Analysis

A Daylight Analysis was conducted by H3D, specialists in daylight/sunlight assessments. The assessment of the proposed development was prepared using the methodology's set out in the British Standard: *Lighting for Buildings – Part 2: Code of Practice for Daylighting, BRE 209, 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'*, Second Edition 2011, by P. J. Littlefair and the *Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018)*. The assessment studied 130 spaces throughout the proposed model for Larkfield House and concluded that all 130 spaces meet or exceed the guidelines levels. The proposed units are considered to provide an acceptable standard of amenity from a daylight perspective. We refer to the daylight analysis report prepared by H3D which accompanies this planning submission for further details on the proposal's compliance with daylight requirements.

10.0 Conclusion

The proposed development is for the internal alteration of the existing residential development at Larkfield House, Coldcut Road, Clondalkin. The proposed development would see a significant improvement on the standard of accommodation provided on site. The existing residential accommodation was introduced to the building which was previously in use as a leisure centre. The primary objective of the applicant is the improve the overall situation at Larkfield House to ensure that the highest standard of residential accommodation possible at this particular site is provided.

It is submitted that the proposed development is in accordance with the policies and guidance provided in South Dublin County Development Plan 2022-2028, as well as national guidance documents such as *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020)*. The proposed development comprises the alteration of the existing residential units at Larkfield House to improve the standard of accommodation provided. The internal alterations proposed would ensure that the apartments meet the required standards outlined in the County Development Plan and

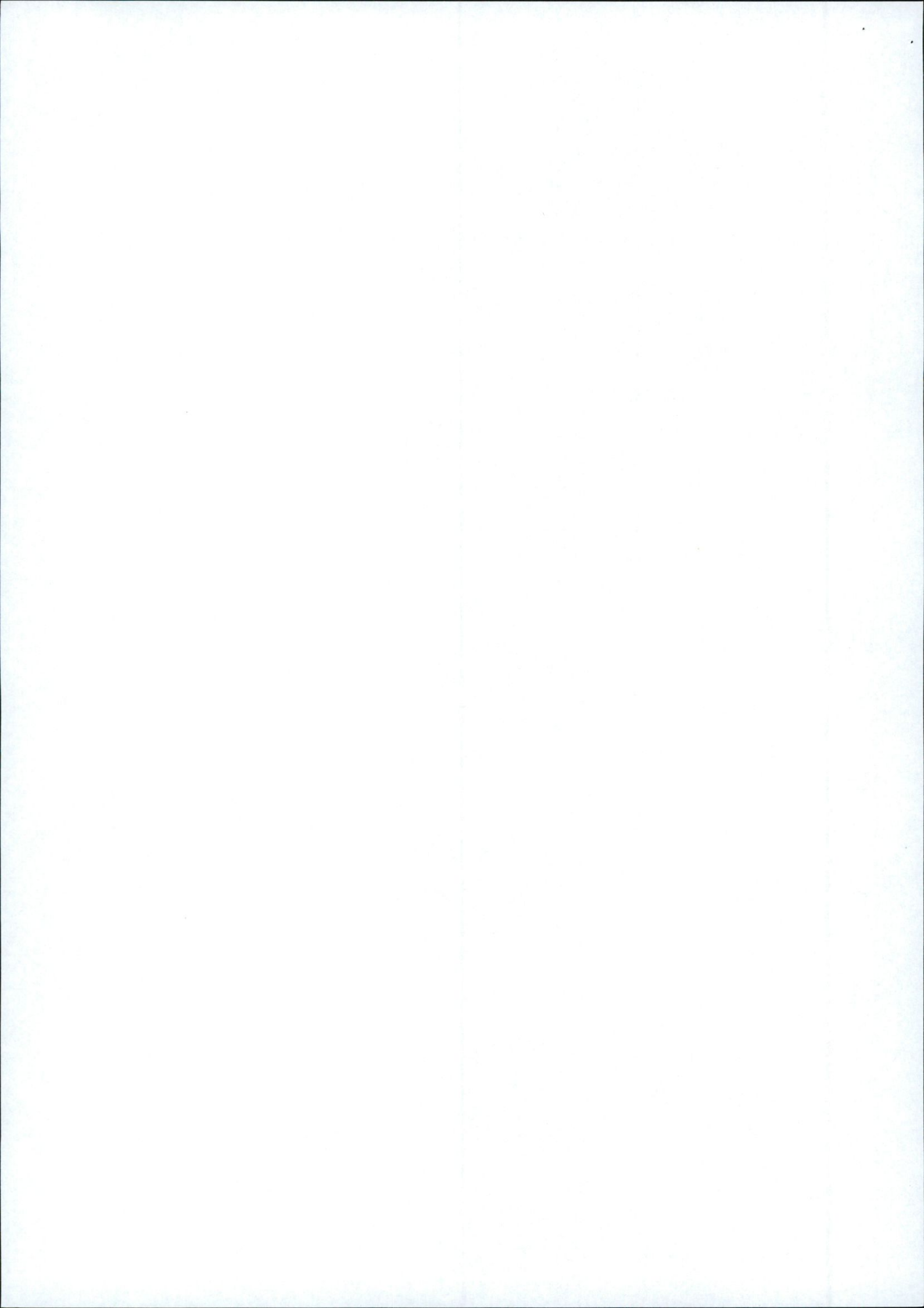
relevant guidance documents. H3D daylight specialists were appointed to assess the building as built, and the results of this assessment have informed the redesign of the existing apartments. H3D have prepared a daylight study on the proposed units which concludes that all units meet or exceed the required standards. The proposal outlined in this report would ensure that the existing units meet the required standards in terms of internal daylight access, private amenity space and storage.

It is submitted that the proposal is in accordance with the proper planning and sustainable development of the area.

Yours sincerely,

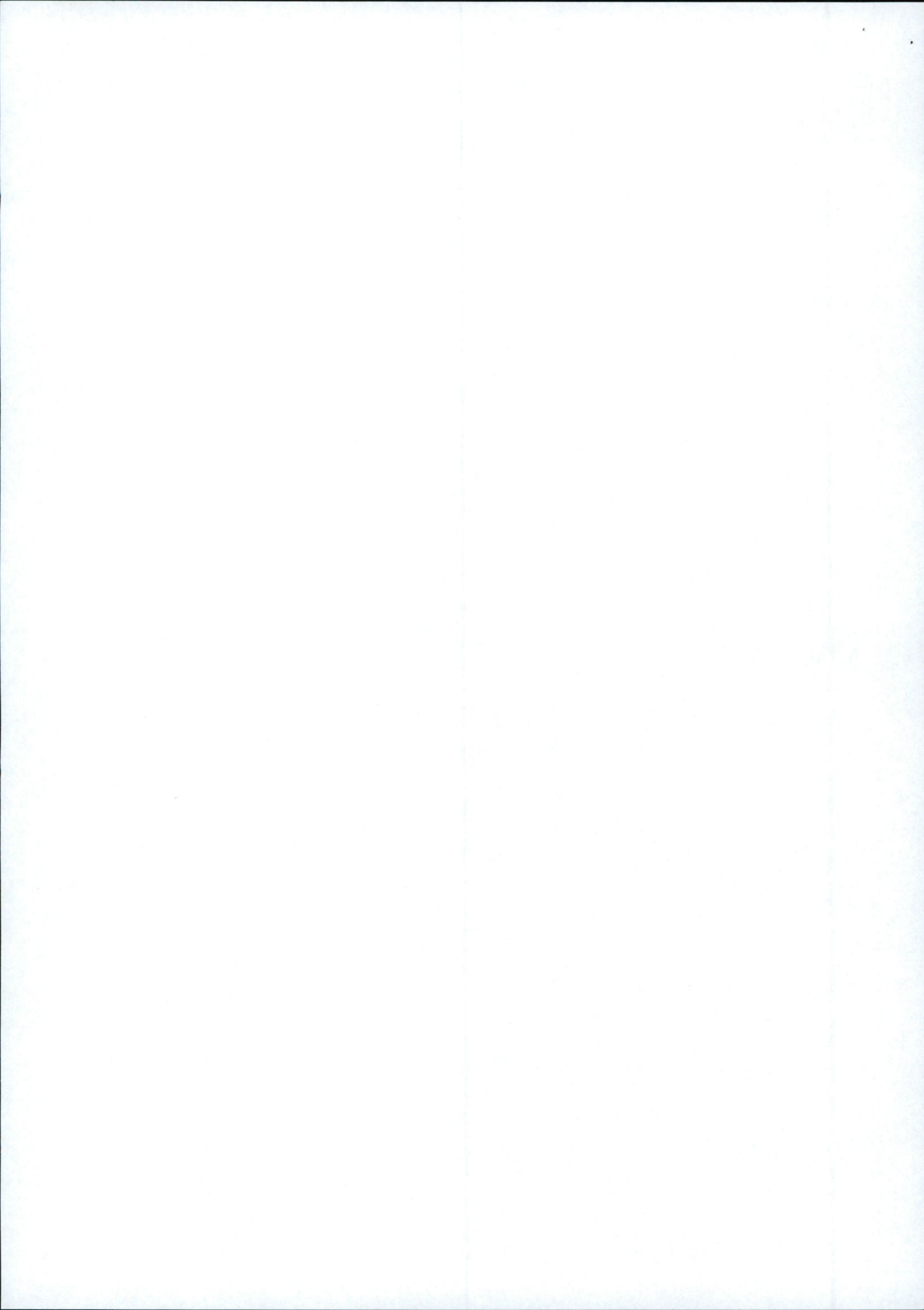
A handwritten signature in purple ink, appearing to read 'KH', with a long horizontal flourish extending to the right.

Kevin Hughes MIPI MRTPI
Director
for HPDC



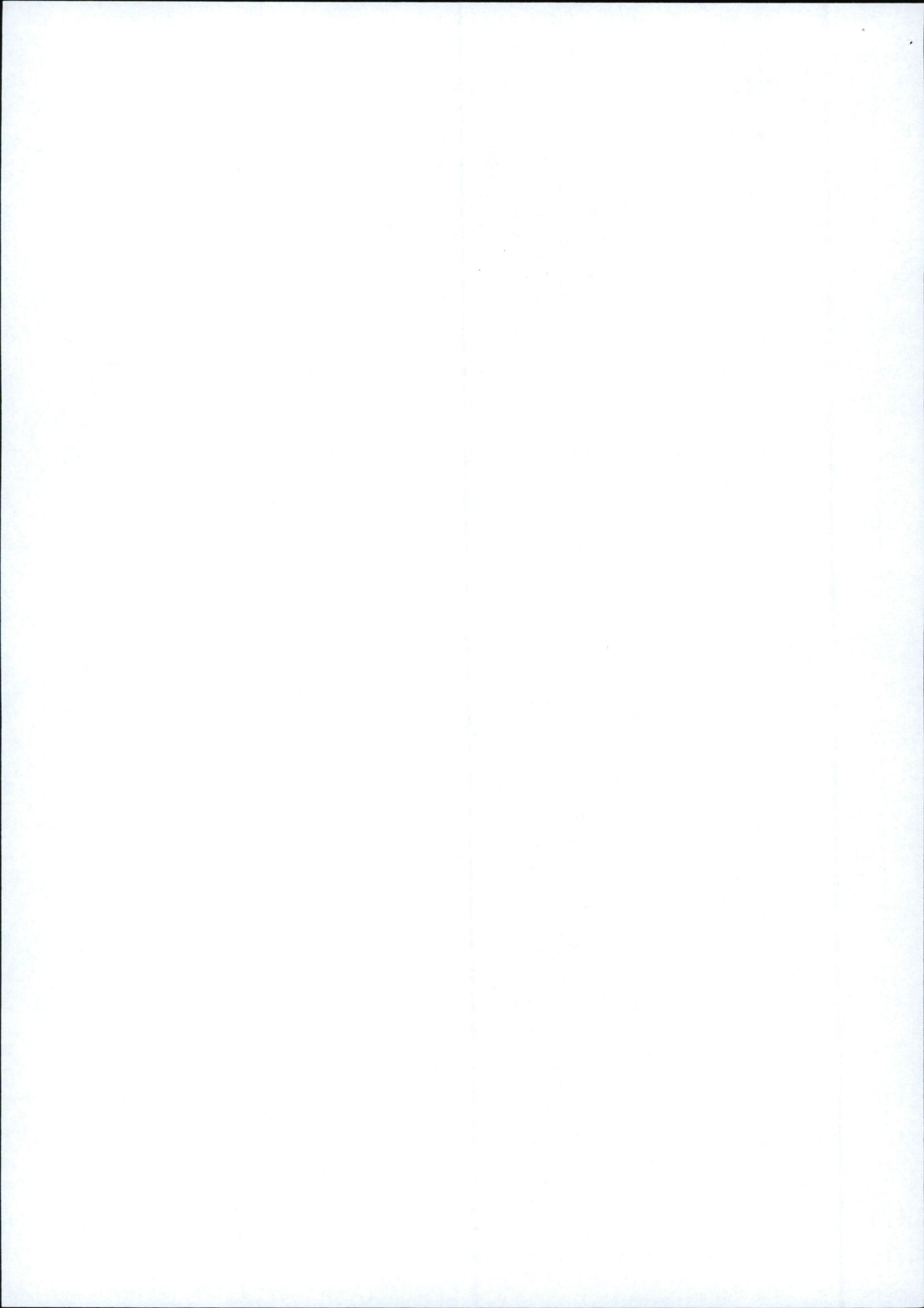
Appendix A

Architectural Drawings and associated documents prepared by HA Design Studio



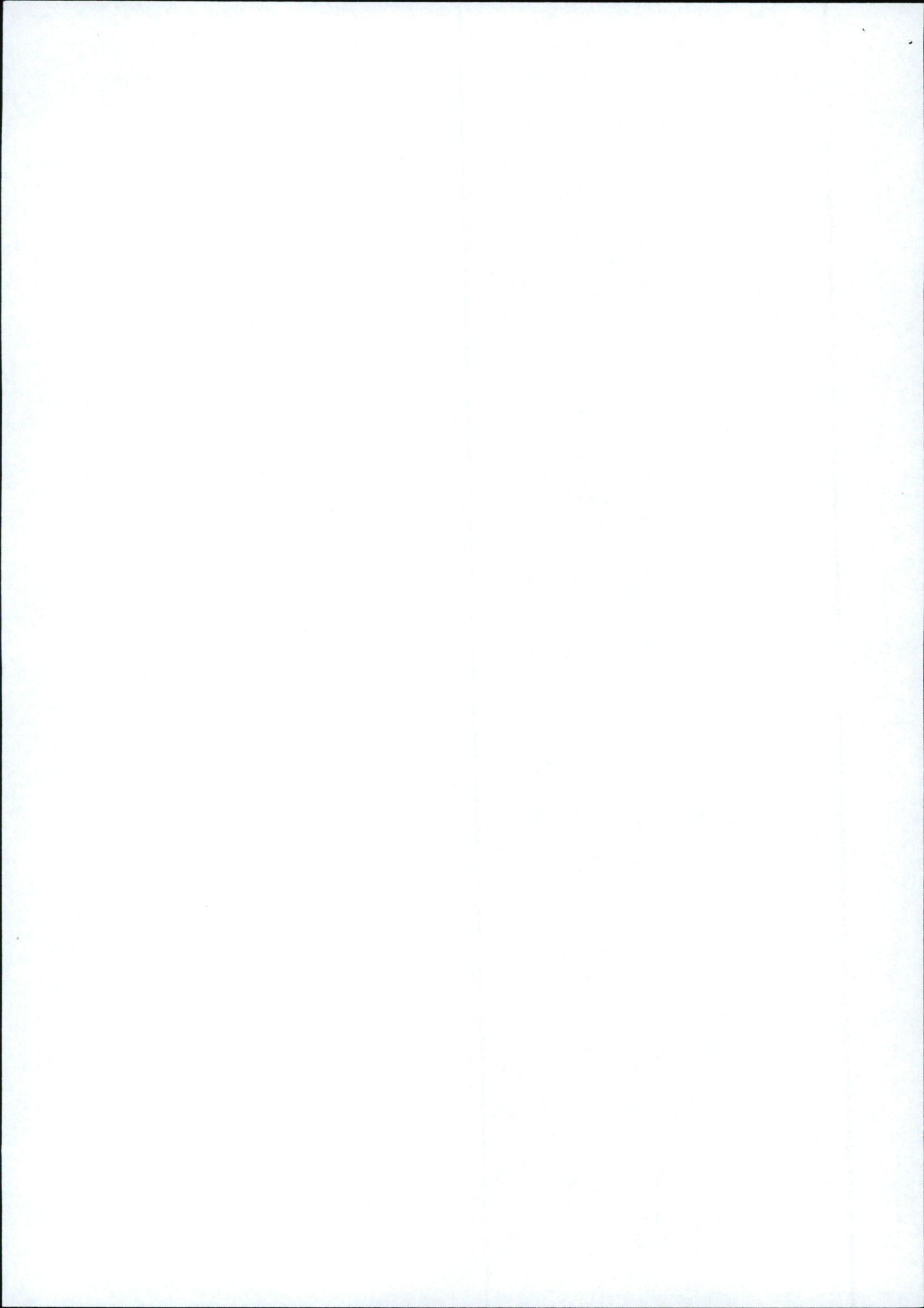
Appendix B

Landscape Plan prepared by Casey Planning and Landscape Consultants



Appendix C

Engineering Drawings, Report, and associated document prepared by TENT Engineering



Appendix D

Daylight Analysis prepared by H3D

