

The Planning Officer,
 South Dublin County Council,
 Planning Department,
 County Hall,
 Town Centre,
 Tallaght,
 Dublin 24.

17th February 2023

Re: Additional Information SD22A/0372

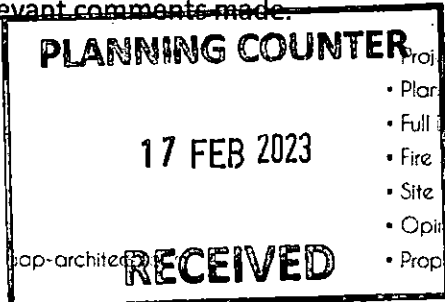
Planning permission for the redevelopment of Saint Claires Villa, Lucan Road. The Development will consist of the following: (1) Demolition of the existing two storey detached dwelling house and outbuildings. (2) The construct of a new purpose built three storey mixed used building with: (a) A new physiotherapy practice, consisting of 5 consultation rooms, office space, staff areas as well as a rehab gym and studio area, all over two floors at ground and first floor levels. (b) A one bedroom apartment with own door access and dedicated private balcony area at the second floor level. (3) 5 No. Car parking spaces and secure bicycle parking for 6 bicycles all on site. (4) Back lit signage to the front facade of the building. (5) All associated site development works. All at Saint Claires Villa, Lucan Road, Lucan, Co. Dublin. K78 X0N1

Dear Sirs,

On behalf of our clients John Shenton & Margaret Hanlon we wish to respond to the additional information request From South Dublin County Council in relation to the above application for Planning Permission at Saint Claires Villa, Lucan Road.

In our response to the request for additional information we have dealt with each of the items in a point by point manner below. Each of the items raised in the additional information request is in italics and the response is in blue, with reference to attached supporting documentation as required.

We note that we during the process of compiling this additional information the design team have been in contact with the relevant sections within the council and we have addressed any issues raised and taken on board relevant comments made.



- Project Feasibility
- Planning Applications
- Full Design Service
- Fire Safety Certificates
- Site Supervision
- Opinions of Compliance
- Property Surveys

Point 1

The Applicant is requested to provide a complete set of revised site layout, plan, sectional and elevational drawings demonstrating the following amendments:

- (i) A more appropriate site layout plan with a car parking arrangement which would not result in unsafe vehicular movements which would cause a pedestrian or traffic safety hazard.*

See attached Gap Architects Drawing AI.01-01 Revised Site Plan.

- (ii) In re-designing the layout of the proposed development, the Applicant should make every effort to retain as much of the low stone wall as possible to negate the visual impact on the streetscape.*

With the redesign of the site plan we have now retained over 80% of the existing low stone wall to the front boundary as shown on Gap Architects Drawing AI.01-01 Revised Site Plan.

- (iii) Having regard to the clear policy narrative within the Development Plan 2022-2028 to include energy efficient measures and green infrastructure in new buildings, the Applicant should provide revised drawings which indicate the inclusion of measures such as green roofs and Photovoltaic panels.*

It is noted that the proposal includes for green roof to the majority of the building as indicated on the Architects and Engineers Drawings originally submitted and now update in the additional information package. See architects , engineers and landscape architects drawings and reports for full information.

- (iv) Having regard to Section 12.8.3 of the Development Plan, the Applicant is requested to outline a consideration of alternative sites in the area and a justification for the demolition of the existing dwelling and removal of the stone wall boundary treatment.*

Our clients currently operate a physiotherapy practice in Lucan Village from a premises located on Vesey Terrace, Lower Main Street. While this property is functional, it does have it limitations and our clients have been seeking to move to a purpose built premises for some time. Currently they have a large client base in the Lucan area and it is imperative that they have their new premises located relatively close to their existing business. Therefore this limited the number of potential sites / premises that would meet this fundamental need.

Having looked at numerous potential site and properties in the required catchment area that would meet their requirements, eventually in April 2021 they acquired the site at St. Claires Villa.

The site as demonstrated in our initial submission is well connected to public transport, within walking and cycling distance of a large number of established

residential developments and is located within the Lucan Village area which also provides ample on street car parking.

With the site located opposite the existing St. Marys Church, local Schools and adjacent to the existing commercial premises of Cunningham's Funeral Home, we are of the opinion that the proposed site is perfect of development as purpose built Physiotherapy Practice that our clients are looking for.

We are also of the opinion that the proposed architectural design adds a modern building with a contemporary design to the existing streetscape and in doing so generates a visual interest and a sense of place while maintaining the existing building lines which are generated by the existing apartment development to the south west side of the site and the existing contemporary designed funeral home to the north east side for the site. The Building has been designed with a number of setbacks to the facade which allows the building to nestle into the site and the streetscape.

The scale and mass of the building on the site reciprocates those of the buildings on the adjoining sites. The height of the building reflects the height of the three storey apartment block adjacent and the school building on the opposite side of the street. (See Gap Architects Drawing P-12 "Existing and Proposed Contiguous Street Elevations" and drawing P-13 "Existing and Proposed Cross Sectional Elevations across Lucan Road") The premises has been designed in such a way that universal design principles have played an integral part to the design process, thus ensuring that the building will be accessible to all, flexible in use and has a simple but intuitive design.

The design of the premises has also incorporated climate action measures including green roof design, orientation of windows to maximise solar gain to the premise. The property is to be heated by way of renewable energy through the use of air to water heat pump technology, this coupled with the use the latest technologies in the proposed construction methods and materials to be used will ensure that the premises will have minimal heat loss and be energy efficient.

Regarding the justification for the demolition of the existing house please see response to point 7 below which deals with this. Regarding the retention of the stone wall boundary to the front of the site it is noted that we now proposed to retain c.80% of this wall.

- (v) *An urban design analysis carried out in accordance with the provisions of South Dublin County's Building Height and Density Guide. The analysis should aid in the determination of whether or not the proposed height increase is contextually appropriate. If the analysis demonstrates an adverse impact on adjacent properties, the proposed development should be re-designed to negate any adverse impact on adjacent properties. Should any re-design be necessary, the Applicant should provide a complete set of revised plans and particulars.*

We are of the opinion that the analysis demonstrates that there are no negative impacts on adjacent properties and this is demonstrated the Urban Design Analysis Report prepared by Gap Architects (see attached report).

- (vi) *Adequate storage space for the apartment unit in line with the minimum requirements of Table 3.21 of the Development Plan.*

As set out in the original submission, see floor plans and in the comparison sheet of the proposed new apartment with the guidelines from Appendix 1 of Sustainable Urban Housing: Design Standards for New Apartments (2020), In these documents we have demonstrated that the proposed apartment exceeds the required minimum storage space.

It is noted that the apartment is an own door apartment, with direct access to the external at ground floor level and there is a storage space located inside the front door and also at the main living space level, the table below clearly indicates this.

	Table 3.21	Provided	Locations
Storage	3 m2	3.6 m2	Store A (inside front door) - 1.6 m2 Store B (off landing area) - 1.7 m2 Store C (off the guest WC) - 0.3 m2

Point 2

The Applicant is requested to provide a detailed Daylight, Sunlight and Shadow Assessment and Report carried out by an appropriately qualified professional, including a detailed analysis of the proposed development and the potential impact on adjoining properties, with specific reference to the relevant BRE Guidance on impacts on sunlight, annual probable sunlight hours and average daylight factor.

It is noted that a shadow assessment has been completed as part of the original submission and from this it can clearly be seen that the proposed development has minimal impact on the adjoining properties. Therefore following discussions with the planner for the area Mr. Conor Doyle, it was agreed that due to the following facts;

- (i) that the proposed development is to the northern side of the adjoining apartment development and this coupled with the fact that the northern elevation of the apartment development contains no windows the proposed development will have little or no negative effect on the adjoining property.
- (ii) The property to the north eastern side of the site, Cunningham's Funeral Home, as can be seen from the initial shadow assessment will not be significantly affected by the proposed development, plus due to the nature of the business that is under taken in the existing premises we are of the opinion that the proposed development will not adversely affect the existing property.

Therefore it is considered that the undertaking of a further more detailed Daylight, Sunlight and Shadow Assessment and Report would not be necessary in this instance.

However it has been agreed that an assessment of the Vertical Sky Component would be undertaken and this has been duly completed and can be seen on the attached GAP Architects Drawing AI.01-02 (Vertical Sky Component (VSC) Assessment).

Point 3

The applicant is requested to provide the following information to facilitate a complete assessment of the proposed development:

- (i) A Construction & Demolition Waste Management Plan (C&DWMP), to include details of the number of loads, haulage routes, times of works, etc.*

Please see attached Construction and Demolition Waste Management Plan for the site. Prepared by Mr. Martin Egan MCIOB, B.Surv(Tech), H&S at Work, Quantity Surveyor & Project Manager.

- (ii) A site layout plan of not less than 1:100 scale, showing a swept path analysis drawing (i.e. AutoTRAK or similar) demonstrating
 - (a) how cars safely access/egress the proposed new parking spaces.*
 - (b) that fire tenders and large refuse vehicles can access/egress the site.**

Please see attached Auto Track Drawing prepared by ONCE engineers showing the safe movement of cars in and out of the site.

It is noted that access to the site for Fire Tender and Large Refuse Vehicles will not be provided due to the size and restricted nature of the site and will be restricted to on street parking.

Refuse collection will be managed locally with collection days and times to be agreed with local service providers, ensuring minimal disruption to traffic on the Lucan Road.

Point 4

The applicant is requested to obtain:

- (i) A Confirmation of Feasibility letter from Irish Water regarding the proposed water supply network and submit same to the Drainage and Water Services Department of South Dublin County Council.*
- (ii) A Confirmation of Feasibility letter from Irish Water regarding the proposed wastewater network and submit same to the Drainage and Water Services Department of South Dublin County Council.*

Please see attached letter from Irish Water confirming the feasibility of both the water supply and the wastewater connection.

Point 5

- (i) *The Applicant is requested to submit a drawing showing additional surface water attenuation for proposed development. Additional attenuation shall be by means of SuDS (Sustainable Drainage Systems).*
- (ii) *The applicant is required to submit a revised drawing and report showing additional surface water attenuation provided by means of SuDS (Sustainable Drainage Systems) to include:*
 - a) *Above ground natural multifunctional (amenity, biodiversity, water treatment/quality and attenuation) sustainable natural drainage solutions such as blue/green roofs, permeable pavement, bioretention areas, rain gardens, filter drains, swales, bioretention tree pits.*
 - b) *Demonstrate the biodiversity value of SuDS - especially important given the site is in a Primary Green Corridor and next to a Core area.*
 - c) *Existing and modified flows.*
 - d) *Detailed design of SUDs features showing how they work.*
 - e) *A comprehensive SUDS management Plan to demonstrate that the proposed SUDS features have reduced the rate of runoff into the existing surface water drainage.*
 - f) *Landscape and drainage proposals to be consistent in SuDS proposals.*

These items have been dealt with by ONCE consulting engineers and Landscape Design Services. Please see attached reports and drawings prepared ONCE consulting engineers and Landscape Design Services.

Point 6

The applicant shall submit and agree a comprehensive landscape and green infrastructure plan with SDCC Public Realm Section. The landscape and green infrastructure proposals shall include:

- (i) *A Green Infrastructure Plan, which may consist of a simple landscape plan that includes objectives to protect or restore existing on site GI assets, provides for connection to local or primary GI corridors or includes elements which allow the site to act as a local stepping stone.*
 - a. *The Green Infrastructure Plans shall include:*
 - *Site location plan showing the development site in the context of the wider GI as shown on the Council's GI Plan for the County;*
 - *Site survey and analysis, identifying existing GI Infrastructure and key assets within the site;*
 - *Indicate how the development proposals link to and enhance the wider GI Network of the County;*
 - *Proposed GI protection, enhancement and restoration proposals as part of the landscape plan, where appropriate, for the site.*
- (ii) *A Landscape Plan to scale of not less than 1:500 showing –*
 - a. *The species, variety, number, size and locations of all proposed planting.*
 - b. *Details of Hard landscape works, specifying surface material.*
 - c. *(Natural) SuDs features such as blue/green roofs, permeable pavement, bioretention areas, rain gardens, filter drains, swales, bioretention tree pits.*

- d. *Details of (natural) SuDs features showing how they work.*
 - e. *Detailed Sections and Elevations*
- (iii) *Planting material where possible should be native and/or pollinator friendly Irish Grown Nursey Stock. The importation of foreign planting material should be avoided within the proposed planting scheme. Trees to be minimum 18-20cmg at planting.*

The design team have dealt with the items raised in point 6 above. Please see the attached report and drawings prepared Landscape Design Services in conjunction with ONCE consulting engineers and GAP Architects.

Point 7

The Applicant is requested to submit an Architectural Impact Assessment carried out by a suitably qualified professional and a detailed justification for the proposed development including consideration of whether or not the existing dwelling could be adapted and re-purposed for the proposed development and whether the existing boundary wall could be fully or partially retained to lessen the impact on the streetscape.

During the preliminary feasibility study that was under taken prior to the initial design stage of the project a desk top study of the existing site and dwelling was under taken. The protected structures record was checked and it was confirmed that the existing property was not a listed building. At the same time it was confirmed that the site was not located within an architectural conservation area.

Then during the initial design process an assessment of the existing residential building on site was made. The building was considered structurally sound as a residential property. However it was noted that large amounts of works would be required to bring the existing premises up to current standards of a modern residential property. It was also noted that the room sizes and floor to ceiling heights were all on the small side.

An assessment was then made to see if it was viable to try and incorporate this tired old building into the proposed new development of a purpose built Physiotherapy Practice.

Some of the areas which were accessed were as follows:

- **Floor to ceiling heights:** Existing floor to ceiling heights are c.2.4m which it was felt were not adequate for a new modern building.
- **Room Sizes:** These ranged from 2.5sqm to 13sqm, the majority of the room sizes were inadequate for the needs of the proposed physiotherapy practice.
- **Floor Plan Layout & Circulation:** The layout of the existing premises and the circulation within the existing building did not lend themselves to the incorporation of the existing building into the new proposed scheme, as this would have resulted in sub standard circulation and spaces within the proposed development.

Based on this initial design assessment it was considered that to achieve a modern purpose built Physiotherapy Practice that our clients required that it would not be a practical or a viable option to incorporate the existing building into the development.

Therefore the design decision was made to proceed with a totally new building on the site.

As part of the revision to the car parking layout that has been required as part of this submission of additional information it has been possible to retain a sizeable portion of the existing low level stone boundary wall to the street. In fact we have managed to keep c. 80% of this boundary as shown on Gap Architects Drawing AI.01-01 Revised Site Plan.

Point 8

The Planning Authority would raise concern that the proposed development, if consented, would result in the land to the rear of the site becoming landlocked and therefore be unable to be developed in the future. The applicant is required to clarify the ownership of this site and demonstrate how the site could be developed in the future.

We can confirm that the land to the rear of the site is not in the ownership of our clients. It is our understanding that this land is in the ownership of Cunningham's Funeral home. Therefore the planning authority can be assured that the site will not become landlocked as access will continue to be available through the site of the funeral home and the status in quo will be maintained.

Should further information or clarification of any of the additional information be required please do not hesitate to contact us at your earliest convenience. We now look forward to a speedy and successful resolution to this application.

Yours faithfully,



Stephen M. Hill
For GAP Architects