

Planning Department  
South Dublin County Council  
County Hall  
Tallaght  
Dublin 24  
D24 YNN5

10/03/2023

**PLANNING APPLICATION**

**RE: Proposed Change of Use to Community Geriatric Daycare Centre and associated works**  
**AT: Presentation Convent, New Road and Convent Road, Clondalkin, Dublin 22, D22WF67**  
**APPLICANT: Bartra Property (NH) Limited**

Dear Sir / Madam,

On behalf of the applicant, Bartra Property (NH) Limited, please find enclosed a planning application for development at Presentation Convent, New Road and Convent Road, Clondalkin, Dublin 22, D22WF67.

**The Site**

The Presentation Convent and Church of the Immaculate Conception, (Protected Structures Ref: 158) is a Gothic-style church and convent dating from the 1850's. The previously permitted development under SD18A/0328 (ABP-304708-19) comprised of a 155-bedroom nursing home and a 14-bedroom retirement home and internal improvements and alterations to part of the existing convent building (Protected Structure) which was to be used as staff accommodation and facilities associated with the nursing and retirement home uses. The Nursing Home / Retirement Home building is nearing completion. This application relates to part of the Convent building only and is to facilitate a new user for this building namely a proposed geriatric daycare facility (Ageing Well Centre). As before, the Order have facilitated retaining the existing Parish Offices and meeting rooms within the Convent building and these areas are therefore not included in the current application and will remain as they are.

**Background To The Current Application**

This planning application is made following a previous refusal of permission under Reg Ref: SD22A/0336.

Following that decision, rather than appeal the decision, the applicant decided to engage in pre-planning discussions within SDCC in relation to the proposals and to address the three refusal reasons.

Following email correspondence with the Planning Department, a pre-planning meeting was held on 27/01/2023 with Caitlin O'Shea and Deirdre Kirwan

The planners were satisfied that the principle of the use could be acceptable within the existing convent building (a non conforming use) based on policies contained within the South Dublin County Development Plan, particularly *Policy NCBH19 Objective 4* which supports alternative uses for Protected Structures and relaxation of site zoning restrictions subject to best practice conservation methods. The justification of the principle of the proposed use and the details of the conservation methods to be applied are outlined below in more detail.

As recommended by the planners, an on-site meeting was arranged with the Conservation Officer – Irenie McLoughlin – and was attended by CCK Architects (Danny Kelly, David Curran) and David Averill of Sheehan & Barry Conservation Architects. The details of that meeting and the manner in which the proposed development has responded to the conservation officer's recommendations are detailed in Section 2.6 of the *Architectural Heritage Impact Assessment* [ Sheehan and Barry Architects ] enclosed.

### **Proposed Use**

The "Ageing Well Centre" is a satellite for Tallaght University Hospital (TUH). A key element of the TUH strategy for the future is to improve access to care delivery to the most vulnerable group of patients, the over 75's, by moving suitable age-related services from the acute setting into the community and delivering those services under the clinical expertise and executive governance of TUH. This proposal is for one such facility to be located at the heart of Clondalkin village. A separate letter from TUH is enclosed and provides further background on the proposed use in the context of their overall operations.

The TUH Ageing Well Centre will provide vital services for the local community in one facility, ensuring no matter what stage of care they need that they can access it locally without any delays. All individuals care needs whether physical, mental, cognitive or social, will be met under one roof.

Services will be provided on an out-patient basis under the governance of the Dept. of the Department of Age Related Health in TUH. The unit will be staffed, and services delivered by TUH employees. Services will be delivered across a multidisciplinary team of TUH healthcare professionals including doctors, nurses, healthcare assistants, physiotherapists, occupational therapists, speech and language therapists, social workers, dieticians, and psychologist. The

Chief Operations Officer (COO) in TUH is responsible for service delivery on a day to day basis. Services will be delivered Monday-Friday between 9am-5pm.

The adjacent nursing home onsite will offer the opportunity to provide localised healthcare to people residing there in addition to allowing for the development of the Step Up/Step Down model of care as set out in the Government's "Slaintecare" initiative.

Additionally, the nearby HSE Primary Care Centre (currently under construction) offers a further stream of services for the cohort within what will be a hub of geriatric services.

### **Description of Proposed Development**

The proposed development is described in the public notices as follows:-

*The development will consist of: change of use of part of existing convent building (Protected Structure - Ref. 158) from staff accommodation ancillary to the adjacent nursing home/ retirement home permitted under Ref: SD18A/0328 (ABP-304708-19) to community geriatric daycare centre (Ageing Well Centre) with all associated ancillary accommodation (1267sqm); internal alterations and improvements to the interior of the convent at ground, first and second floors; external alterations to accommodate two stair cores (one includes a lift) within the courtyard space and minor alterations to existing windows and doors to facilitate new escape routes. Permission is also sought for all ancillary site and development works associated with the above.*

The application relates to the convent building only and floorareas involved are as per the Schedule of Accommodation included at the end of this letter.

## PLANNING ASSESSMENT

### Location Suitability

Given the key location of the convent building in the heart of Clondalkin village, the ageing well centre will be a community-based centre where older people will be able to access clinical and social care closer to home in a holistic environment. The proposed use is considered to be an ideal use for the building and a compatible use with the adjacent nursing home/ retirement home use and the nearby Primary Care Centre.

### Zoning / Principle of Development

The *South Dublin County Council Development Plan 2022-2028* is the relevant statutory development plan and the subject site is zoned 'OS'. Whilst it is the case that use categories closest to the proposed use are "Not Permitted" on Open Space zoned lands in general, it is our submission that the interpretation of the Development Plan (when considered in the round) supports the development proposed (comprising both the "works" and the "change of use").

The convent is a "non conforming use" in the meaning given to it in Section 12.2.1 of the Plan and, in terms of the 3 scenarios stated, this can be invoked by reference to either:

- (a) The established non-conforming use as a "convent" which is a pre-63 use, OR
- (b) A permitted non-conforming as a nursing home/ retirement home (or at least as ancillary staff accommodation to the overall planning unit which is the nursing home/ / retirement home)

The discretion afforded to the Planning Authority is also informed by other policies in the Development Plan. This is acknowledged in the Development (Section 12.2 Land Use Zoning Objectives) which states that '*Development proposals will be assessed against the policies, objectives, standards and criteria set out in the Plan, in addition to wider legislation and guidance*' In this context, Section 12.2 also states that '*...these tables are for guidance only*' and that '*the use classes and definitions listed are intended as general guidance and are not exhaustive.*'

The policy support for the application is summarised below.

### Policy relating to reuse of Protected Structures

In addition to a range of national policies (eg. National Policy Objective 17 of the National Planning Framework (NPF) and Regional Policy Objective 9.30 of the RSES which support the sensitive re-use of protected structures, there is strong support in this instance based on the following policies

Section 3.5 Built Heritage (p119)

- Policy NCBH19: Protected Structures
- NCBH19 Objective 3
- NCBH19 Objective 4

Section 8.4 Social/ Community Infrastructure (p296)

- Policy COS2: Social/ Community Infrastructure
- COS2 Objective 2
- COS2 Objective 3
- COS2 Objective 4
- COS2 Objective 5

Section 8.8 Healthcare Facilities

- Policy COS6: Healthcare Facilities
- COS6 Objective 1
- COS6 Objective 3

Policy NCBH19: Protected Structures, in particular, is relevant in this instance and states as follows:

**NCBH19 Objective 4:**

To support alternative uses for Protected Structures including former institutional sites in order to provide continued security of the heritage value of these buildings, attendant grounds and associated landscape features.

To this end, the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the protected structure where the use proposed is compatible with the existing structure and where the proposed development is consistent with best practice conservation policies and the proper planning and sustainable development of the area.



Section 12.3.7 Protected Structures relates to Development Management standards and states as follows in relation to planning applications involving change of use of protected structures:-

*(iii) Change of Use The Planning Authority will consider proposals for the change of use or re-use of a Protected Structure based on the policies and objectives outlined in this Plan and may operate a level of flexibility to help safeguard the ongoing use and preservation of the structure. A Design Rationale and Method Statement should be submitted as part of any planning application for the adaptive reuse or repurposing of a Protected Structure*

In terms of the "OS" zoning objective, it is noted in this instance that the proposed use of the existing building does not in any way contravene the policies set down in Section 8.7 (Parks and Public Open Space, p305) or will not erode the integrity of the lands zoned "open space" on this

particular site. If the intention of the recent change in the zoning objective (from “Residential” to “Open Space”) was to protect and retain the open character of the convent grounds, then this proposal does not affect that objective.

### **Details of Conservation Works and Interventions**

As stated above, the conservation principles for this building discussed with the Council’s Conservation Officer at pre-planning stage on the previous application. The architects – CCK - have worked with the conservation architects - Sheahan & Barry – who have detailed and assessed the proposals and reported on them in the *‘Architectural Heritage Impact Assessment’* enclosed.

The report responds to the issues raised in the previous decision (Reason 2) regarding the partition of rooms and potential impact on the building as a result of fire safety upgrades. Further detail is also provided in relation to the proposed staircase towers located within the courtyard.

The alterations and improvements to part of the existing convent building at ground, first and second floor levels include the following:

- a) subdivision of Convent Chapel to provide quiet room (accessed from the adjacent Church only) and a new Physio/Therapy Room within the Chapel,
- b) internal works and adjustment, removal and addition of partition walls, services and fittings to including new Part M toilet on the ground & first floor, with Staff toilets/change located on the second floor, other sundry opes in connection with new service installations.  
(Note: the 25no. proposed bedrooms at ground, first and second floor levels are no longer proposed resulting in a reduced level of intervention)
- c) sundry internal modifications, refurbishment and improvements to rooms and circulation areas, upgrading of flooring, walls and internal doors to meet fire regulations, draughtproofing windows and improving window safety,
- d) sundry refurbishment works to allow for conservation and repair of building fabric, roof finishes, structure and retained fixtures
- e) New openings in the existing external walls to facilitate the two new stair cores, alterations to a number of existing windows and external doors to facilitate the new escape routes.
- f) removal of the existing metal external stairs and replacing with new stairs and lift which requires a new opening to be formed in the existing external walls and associated internal modifications

The level of intervention is reduced when compared with the previous application Ref: SD22A/0336 following the on-site consultations with the Conservation Officer and following further inputs from the Fire Safety Consultant.

As noted in the context of the most recent refused application, the Nursing Home permission (Ref: SD18A/0328 (ABP-304708-19) approved a schedule of works and a use for the convent

building and the proposal was that it be used as staff accommodation and facilities associated with the nursing and retirement home uses. This involved considerably more interventions including the insertion of 25no. en-suites into the various rooms.

### **Water Services**

The proposed development will connect into existing services infrastructure already in place to serve the area. These issues are also addressed in the **Engineering Services Statement** by CS Consulting enclosed.

### **Parking**

The proposed use will be accessed via the new vehicular and pedestrian entrance from New Road and no additional parking spaces are proposed over what was previously approved. In this context, the traffic generated by the proposed change of use will result in an imperceptible increase in traffic on the local road network. Refer to Section 7.0 of the enclosed **Engineering Services Statement** [CS Consulting].

The approved allocation of parking for the Nursing Home permitted under SD18A/0328 (ABP-304708-19) made provision for the convent building which, at that time, was proposed as staff accommodation and ancillary uses for the nursing home. Section 7.0 of the **Engineering Services Statement** [CS Consulting] explains how the approved 39 spaces can be managed to cater for the parking needs of the overall site, including the proposed Ageing Well Centre. The assessment also outlines how the consideration of parking needs to be considered in the context of Mobility Management Measures, bicycle parking and public transport accessibility in accordance with the policies and standards outlined in the Development Plan.

### **Landscaping**

Landscape proposals for the courtyard area have been revised by Ronan MacDiarmida Landscape Architects and are enclosed. Refer to Drawings and **Landscape Rationale** by RMDA enclosed for details.

### **M&E/ Energy**

Refer to **Mechanical, Electrical and Lift Services Statement** [JV Tierney] enclosed

### **AA Screening**

Appropriate Assessment Screening - Given the nature and scale of the current application which is similar to the previously permitted development, it is considered that no significant effects to the Natura 2000 network are likely to arise from the proposed scheme.

## ENCLOSURES

We enclose the following in support of the application (10 copies): -

### Planning Particulars (1 copy)

- Cover Letter (this letter)
  - Description of Proposed Development (Planning Form- Question 9)
  - Schedule of Accommodation
  - Application Fee EFT confirmation—€4562 (€1267sqm x 3.60/ sqm)
  - Letter of Consent
- Site Notice
- Newspaper Notice (Original and copy)
- Planning Application Form

### Drawings (10 copies)

- Schedule of Drawings, Schedule of Accommodation and Drawing Pack (CCK Architects)

### Reports (10 copies)

- *Architectural Heritage Impact Assessment* [ Sheehan and Barry Architects ]
- *Landscape Drawing and Landscape Rationale* [ Ronan MacDiarmada ]
- *Engineering Services Statement* [ CS Consulting Engineers ]
- *Mechanical, Electrical and Lift Services Statement* [ JV Tierney ]

## Conclusion

We look forward to your decision in due course. If there are any questions in relation to any aspect of the information submitted with this application, please feel free to contact us.

Yours sincerely,



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Ray Ryan  
BMA PLANNING



## Description of Proposed Development

(Ref: Planning Application Form Question)

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**South Dublin County Council** – Bartra Property (NH) Limited intends to apply for planning permission for development At Presentation Convent, New Road and Convent Road, Clondalkin, Dublin 22, D22WF67

The development will consist of: change of use of part of existing convent building (Protected Structure - Ref. 158) from staff accommodation ancillary to the adjacent nursing home/retirement home permitted under Ref: SD18A/0328 (ABP-304708-19) to community geriatric daycare centre (Ageing Well Centre) with all associated ancillary accommodation (1267sqm); internal alterations and improvements to the interior of the convent at ground, first and second floors; external alterations to accommodate two stair cores (one includes a lift) within the courtyard space and minor alterations to existing windows and doors to facilitate new escape routes. Permission is also sought for all ancillary site and development works associated with the above.

This application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of South Dublin County Council during its public opening hours of 9am – 4pm, Mon-Fri, and a submission or observation may be made to South Dublin County Council in writing and on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by South Dublin County Council of the application

## Schedule of Accommodation

### 2201- Clondalkin TUH – SCHEDULE OF ACCOMMODATION

Item	As Permitted	As Proposed (TUH)
<b>Site:</b>		
Site Area	13,386m <sup>2</sup> (1.34Ha)	1,050m <sup>2</sup> (1.05Ha)
Total Nursing Home Building	7619m <sup>2</sup>	No Change
Total Assisted Living Building	1069m <sup>2</sup>	No Change
Total Convent Building (Nuns)	1171m <sup>2</sup>	----
Total Convent Building (Parish)	257m <sup>2</sup>	274m <sup>2</sup>
Total Convent Building (TUH)	----	1267m <sup>2</sup>
Total Buildings Footprint	2754m <sup>2</sup>	No Change
Open space	4431m <sup>2</sup>	384m <sup>2</sup> (Convent Courtyard)
<b>Carparking:</b>		
Nursing Home	32	20
Assisted Living Building	07	No Change
TUH	----	12
Part M Spaces: (Incl. Above)	03	No Change
Elec. Charging Spaces:	10%	10%
<b>Total Spaces:</b>	<b>39</b>	<b>39</b>
<b>Convent Building Area:</b>	<b>Existing</b>	<b>Proposed</b>
Ground Floor Area:	491m <sup>2</sup>	491m <sup>2</sup>
First Floor Area:	484m <sup>2</sup>	465m <sup>2</sup>
Second Floor Area:	212m <sup>2</sup>	182m <sup>2</sup>
Convent Proposed Extensions		129m <sup>2</sup> (New Stairs & Lift)
Total Convent Building	1187m <sup>2</sup>	
<b>Total TUH Floor Area:</b>		<b>1267m<sup>2</sup></b>

## Planning Application Fee – EFT Payment

**Bank of Ireland**   
BUSINESS ON LINE

### Payment Details

Payment Reference No. 186476751

Printed On  
Monday, March 06, 2023  
09:18:49 AM

Pay From > BP NH CLONDALKIN , BALLSBRIDGE DUBLIN 4 ,  
88730947

Pay To > SOUTH DUBLIN COUNTY COUNCIL ,  
IBANIE03AIBK93331731001779

Payment Details > €4,562.00 on 06/03/2023, SEPA Payment

Payment Currency:	EUR
Payment Type:	Standard
Payment Amount:	4,562.00
Payment Date:	06/03/2023
End to End Reference:	CLONDALKIN CONVENT
Payment Message:	BARTRA CLONDALKIN COVENT BUILDING

Status > Payment Processed

**Letter of Consent**

*Presentation Convent  
New Road  
Clondalkin  
D22 WF67*

Planning Department  
South Dublin County Council  
County Hall  
Tallaght  
Dublin 24  
D24 YNN5

12/08/2022

RE: Planning Application for Proposed Change of Use and associated works at  
Presentation Convent, New Road and Convent Road, Clondalkin, Dublin 22  
D22WF67  
APPLICANT: Bartra Property (NH) Limited

To whom it may concern,

We hereby consent to the inclusion of lands within our ownership at the above address as part  
of the above referenced planning application by Bartra Property (NH) Limited.

Yours sincerely

*An Frances Browe*

Presentation Sisters North East Province

# **SOUTH DUBLIN COUNTY COUNCIL**

## **SITE NOTICE**

Bartra Property (NH) Limited intends to apply for permission for development at Presentation Convent, New Road and Convent Road, Clondalkin, Dublin 22, D22WF67.

The development will consist of: change of use of part of existing convent building (Protected Structure - Ref. 158) from staff accommodation ancillary to the adjacent nursing home/ retirement home permitted under Ref: SD18A/0328 (ABP-304708-19) to community geriatric daycare centre (Ageing Well Centre) with all associated ancillary accommodation (1267sqm); internal alterations and improvements to the interior of the convent at ground, first and second floors; external alterations to accommodate two stair cores (one includes a lift) within the courtyard space and minor alterations to existing windows and doors to facilitate new escape routes. Permission is also sought for all ancillary site and development works associated with the above.

The planning application may be inspected or purchased at the offices of South Dublin County Council, County Hall, Town Centre, Tallaght, Dublin 24 during its public opening hours of Monday to Friday from 9:00am to 4:00pm and may also be viewed on the Council's website – [www.sdcc.ie](http://www.sdcc.ie). A submission or observation in relation to the application may be made in writing to South Dublin County Council on payment of a fee of €20 within 5 weeks of receipt of the application by South Dublin County Council and such submissions or observations will be considered by the Planning Authority in making a decision on the application. The Planning Authority may grant permission subject to or without conditions or may refuse to grant permission.

SIGNED:  (Agents)

AGENT'S ADDRESS: BMA Planning, Taney Hall, Eglinton Terrace, Dundrum, Dublin 14

DATE OF ERECTION OF SITE NOTICE: 10/03/2023