

## ARCHITECTS REPORT

**Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 4no. 1-bedroom apartments in a two-storey structure on the Old Lucan Road adjacent to the junction with Hollyville Lawn, Palmerstown, Dublin 20.**

PROCESS UNDER THE PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED) PUBLIC CONSULTATION PROCEDURE UNDER PART 8 OF THE LOCAL GOVERNMENT (PLANNING & DEVELOPMENT) REGULATIONS 2001 (AS AMENDED).



### **Consultation Process stage.**

*This is an advisory report. The full report will be issued following the conclusion of the Consultation Process.*

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## INTRODUCTION – THE PART 8 PROCESS

The following is a brief explanation of Part 8 Process carried out under Part 8 of the Planning and Development Regulations 2001 (as amended).

Developments by a local authority are subject to a public consultation process as set out in the Planning & Development Regulations, 2001 (as amended). This procedure requires that notice of the proposed development be given in the public press and that a site notice be erected. If any submissions or observations are received, a report is presented to the members of the Council.

This report contains a list of the objector's names along with a summary of the points made by them and the Local Authority's response. Arising from consideration of the representations, the report then sets out whether or not it is proposed to proceed as originally planned or to proceed with a modified proposal.

### Development by a Local Authority: 'Part 8'

From time to time the Local Authority may carry out development within its administrative area, such as the construction of houses, roads, swimming pools, public toilets etc.

Development carried out by a Local Authority is often referred to as a 'Part 8': - this is reference to Part 8 of the Planning and Development Regulations 2001 (as amended) which sets out the procedure for carrying out such developments.

Public consultation is an intrinsic part of the 'Part 8' process. This is achieved by public notices, public display of the proposal, observations by members of the public, reportage on observations received and a recommendation that considers all internal and public observations. The consultation may extend to advisory consultation meetings with local community and interest groups dependent on the particular circumstances and impact of the proposal, though such meetings are not proscribed under the legislation. The primary purpose of the process is to notify the public of the proposal and incorporate any observations validly submitted into a report to inform the Council on its decision to recommend the proposal.

Comments and observations on Proposed Developments by a Local Authority can only be received in writing between certain dates. The public notices should be referred to in this regard to ascertain the final date of receipt for observations.

Part 8 of the Planning and Development Regulations 2001 (as amended) refers to requirements in respect of specified development by, on behalf of, or in partnership with Local Authorities. Part 8 applications are generally lodged by the proposing department within the Council. Article 80 of the Planning and Development Regulations 2001 (as amended) sets out a list of the types of development prescribed for the purposes of the act.

The process is as follows:

*Public Notices of the proposed development must be placed in an approved newspaper. A site notice (or notices) must be erected on the land on which the proposed development is situated – Article 81(1)(a)(b) of the Planning and Development Regulations 2001 (as amended) provides guidance on the requirements.*

*The application, which must be submitted on the same date as the newspaper notice, must include a copy of the newspaper notice and site notice and drawings for public display of the proposal accessible to the public during normal office hours – via the Planning Portal. Drawings can be made available to the public on request.*

*There is no fee payable on a Part 8 application.*

*The application is referred to internal works Departments in the Council – (Roads, Water, and Drainage).*

*In the case of protected structures, the application is referred to the Conservation Section, An Taisce, DHPLG and the Heritage Council.*

*The timeframe for third party Observations/Submissions on the Part 8 application is six weeks from the date of lodgement. This date is specified in the public notices. (There are 5 weeks allowed for a normal planning application.) There is no fee for observations/submissions on a Part 8.*

*At the end of the period for observations/submissions, the proposing*

*Department completes a report on the public display for the attention of the Executive Manager of the Planning Department. The Executive Manager will make a recommendation to the proposing department on foot of this report.*

*A report will then be compiled for a meeting of the Council. Following consideration of this report by the Council, the proposed development may be recommended, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the report, or decides not to proceed with the development' – as per Section 179(4)(b) of the Planning and Development Act 2000 (as amended).*

*The making of a decision on a Part 8 application is a reserved function of Council, while for a normal planning application this is an executive function.*

The above is a summary of the Part 8 requirement for consultation. It is intended for guidance only. The Planning Acts set out the requirements in full.

## NOTICE

### South Dublin County Council - Proposed Development

**Proposed Development of a Social Housing Project for Independent Living for Older Persons, consisting of 4no. 1-bedroom apartments in a two-storey structure on the Old Lucan Road adjacent to the junction with Hollyville Lawn, Palmerstown, Dublin 20.**

Planning and Development Act, 2000 (as Amended) Public Consultation Procedure under Part 8 of the Government Planning and Development Regulations 2001 (as Amended). Pursuant to the requirements of the above, notice is hereby given of the proposal to construct the following scheme by South Dublin County Council:

**Social Housing Project for Independent Living for Older Persons, consisting of:  
4no. 1-bedroom apartments  
in a two-storey structure on the Old Lucan Road adjacent to the junction with Hollyville Lawn,  
Palmerstown, Dublin 20.**

**The works include: new access from Old Lucan Road, new boundary walls and gate to Old Lucan Road, provision of 4no. car parking spaces in a landscaped front garden, courtyard garden to rear, improvement works to boundaries and all necessary associated ancillary works on the site and to adjacent areas. All units to be minimum A3 rated.**

The proposed Scheme has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) and a preliminary examination for Environmental Impact Assessment. The Planning Authority has concluded that there will be no real likelihood of significant effects on the environment arising from the proposed development and therefore an Environmental Impact Assessment is not required. Any person may, within 4 weeks from the date of this notice, apply to An Bord Pleanála for a screening determination as to whether the proposed development would be likely to have significant effects on the environment.

**Due to Covid-19 restrictions, plans and particulars of the proposed scheme will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy for a period of four weeks from Thursday 11<sup>th</sup> June 2020 only by appointment at the offices of South Dublin County Council, County Hall, Tallaght, Dublin 24, and available online on the Consultation Portal.**

#### Submissions:

Submissions or observations in relation to the proposed development, dealing with the proper planning and sustainable development of the area in which the development would be situated, may be made as follows:

Online at <https://consult.sdblincoco.ie> up to midnight on Thursday 23<sup>rd</sup> July 2020.

Or

Written submissions not later than 5.00pm, on Thursday 23<sup>rd</sup> July 2020.

Please address your submission to: Senior Executive Officer, Housing Department, South Dublin County Council, County Hall, Tallaght, Dublin 24.

**NOTE: Please make your submission by one medium only.**

Only submissions received by Thursday 23<sup>rd</sup> July 2020 and addressed as set out above, will be considered. Submissions cannot be accepted in any other format or to any other postal address. Submissions and observations should state the name, address, and, where relevant, details of any organisation, community group or company etc. which you represent. It should be noted that the Freedom of Information Act applies to all records held by South Dublin County Council. South Dublin County Council's Personal Data Privacy Statements can be viewed at [www.sdcc.ie](http://www.sdcc.ie) and all personal data will be retained in line with statutory requirements. Date site notice erected: 11/06/2020

## CONTEXT

The proposed site is located on the Old Lucan Road in Palmerstown. The Old Lucan Road was formerly the main road from Dublin to the West but was by-passed in the 1990's and is now a very wide cul-de-sac with a turning circle approximately 250m to the west of the site in question.

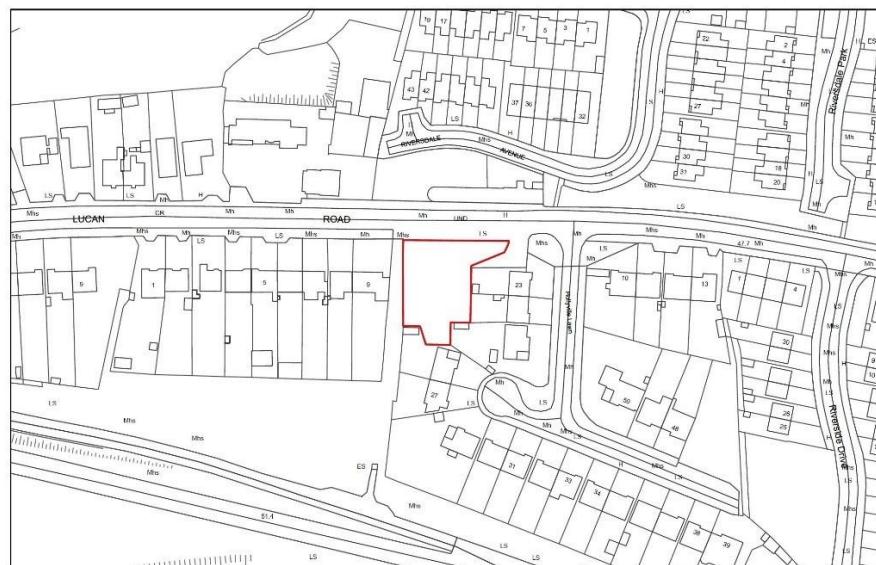


Fig. 1 – Site Location

The site was originally occupied by a stable, as was the site opposite on which part of the original structure remains (a protected structure), and it pre-dates the surrounding development from the 1960's. The site was occupied by a motor vehicle premises which closed some time after the by-pass opened. We believe that it contained a large single storey shed to the rear and a forecourt to the front. The shed was subsequently demolished, and the site is now vacant with the exception of some perimeter/boundary walls which it is proposed to retain. The site measures 1025m<sup>2</sup>.

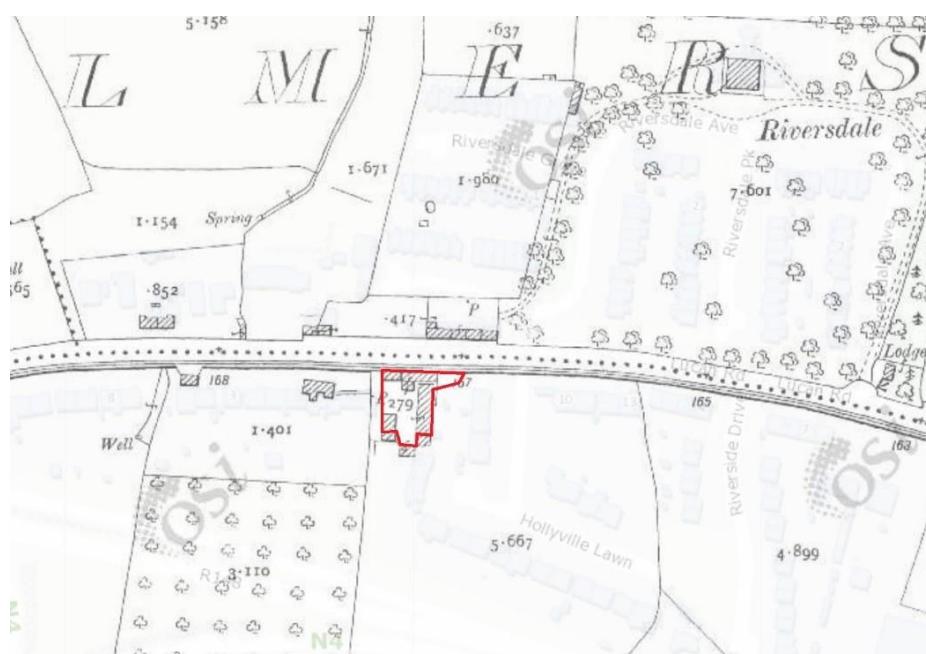


Fig. 2 – Map circa 1900

The site is surrounded by residential development of a consistent type – two storey semi-detached housing with concrete tile roofs, and pebble dashed or rendered external finish with brick trim. This is low density housing with large front and rear gardens. To the east and south the site is bounded by the rear of houses fronting onto Hollyville Lawns. To the west it faces the side of a house fronting onto Old Lucan Road.



Fig. 3 –Aerial View (Bing Maps)

The site is well served by public transport and local facilities. The site is relatively free of onsite services, and it is currently undeveloped.



Fig. 4 – Site approached from East

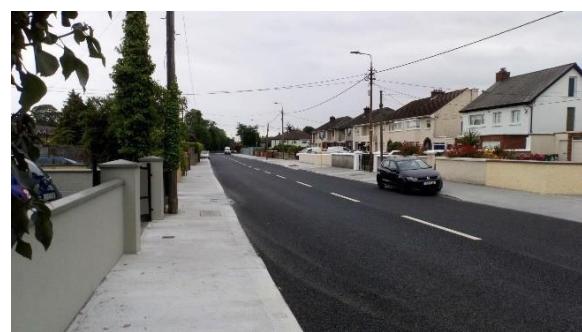


Fig. 5 – Site approached from West



Fig. 6 – Site from Old Lucan Road



Fig. 7 – Site from Old Lucan Road with neighbouring houses

### Housing Need in the area:

There is demand for housing for older persons in the Palmerstown/Fonthill Local Electoral Area. It is envisaged that these units will be used for persons to downsize from existing larger units, freeing up larger units for further housing.

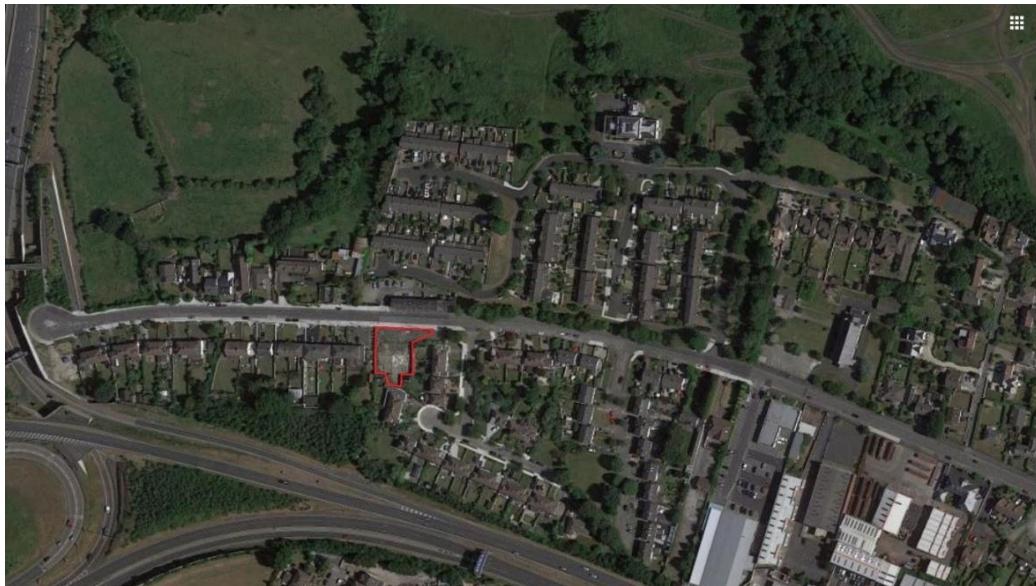


Fig. 8 – Aerial Map – Google Maps - Palmerstown Village to the right-hand side

### Site Location:

Site Location and Extent – Local facilities, shops, schools, health centre are within 10-15 minutes' walk. The proposal for housing as part of an established neighbourhood with community facilities. The proposal for housing is supported by readily available access to extensive and riverside walks, as well as shopping and leisure facilities in Palmerstown Village.

## SITE CONSTRAINTS

The site is generally level. All services are available in the Old Lucan Road. The design has been carefully considered to avoid impacting on the amenity of the rear gardens of adjoining properties through overlooking or overshadowing.



Fig. 9 – Site Constraints Plan

## LAND USE ZONING

Under the “South Dublin County Council Development Plan 2016 – 2022”, the lands are zoned RES  
 - To protect and/or improve residential amenity



Fig. 10 – Zoning Map- SDCC Development Plan 2016 - 2022

## Planning Policy Context

The national, regional and development plan policies are the following:

### National and Regional Policy

*Project Ireland 2040 National Planning Framework*, Government of Ireland, 2018.

*Quality Housing for Sustainable Communities-Best Practice Guidelines*, Department of the Environment, Heritage and Local Government, 2007.

*Sustainable Residential Development In Urban Areas - Guidelines for Planning Authorities*, Department of Environment, Heritage and Local Government (December 2008).

*Urban Design Manual; A Best Practice Guide*, A Companion Document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, Department of the Environment, Heritage and Local Government, (2008).

*Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*, Department of the Environment, Community and Local Government (2015).

*Design Manual for Urban Roads and Streets* Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (2013).

*Regional Planning Guidelines for the Greater Dublin Area 2010-2022*, Dublin Regional Authority & Mid-East Regional Authority, (2010).

*Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities*, Department of the Environment, Heritage and Local Government, (2009).

*The Planning System and Flood Risk Management - Guidelines for Planning Authorities*, Department of the Environment, Heritage and Local Government & OPW, (2009).

*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*, Building Research Establishment, (1991).

*Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009 – 2020*, Department of Transport, (2009).

*National Cycle Manual – National Transport Authority (June 2011)*.

#### Relevant Policy in South Dublin County Council Development Plan 2016 – 2022

##### *CORE STRATEGY (CS) Policy 2 Metropolitan Consolidation Towns*

It is the policy of the Council to support the sustainable long-term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.

##### *CS2 Objective 5:*

To promote and support high quality infill development in existing built-up areas.

##### *Policy H2 Supply of Housing*

It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.

##### *H2 Objective 1:*

To ensure that sufficient zoned land, which could be serviced by sufficient public transport and road capacity, continues to be 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 1 Introduction and Core Strategy.

##### *Policy H3 Housing for Older People*

It is the policy of the Council to support the provision of accommodation for older people in established residential and mixed use areas that offer a choice and mix of accommodation types to older people (independent and semi-independent living) within their communities and at locations that are proximate to services and amenities.

##### *H3 Objective 1:*

To support housing that is designed for older people (including independent, semi-independent or nursing home accommodation) in residential and mixed-use areas, at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.

*H3 Objective 4:* To carry out, during the lifetime of this Plan, a comprehensive study of options for housing for older people in those parts of the County with the highest proportions of older people, and to make specific recommendations for housing provision in these areas.

##### *Policy H6 Sustainable Communities*

It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.

*Policy H7 Urban Design in Residential Developments*

It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).

*H7 Objective 4:*

That any future development of both residential and/or commercial developments in Palmerstown Village and the greater Palmerstown Area shall not be higher than or in excess of three stories in height.

*H8 Objective 1:*

To ensure that the density of residential development makes efficient use of zoned lands and maximises the value of existing and planned infrastructure and services, including public transport, physical and social infrastructure, in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).

*H9 Objective 3:*

To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing (see also Section 11.2.7 Building Height).

*Policy H10 Mix of Dwelling Types*

It is the policy of the Council to ensure that a wide variety of adaptable housing types, sizes and tenures are provided in the County in accordance with the provisions of the Interim South Dublin County Council Housing Strategy 2016-2022.

*Section 2.3.0 Quality of Residential Development*

*Policy H11 Residential Design and Layout*

It is the policy of the Council 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.

*Policy H12 Public Open Space*

It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.

*Policy H13 Private and Semi-Private Open Space*

It is the policy of the Council to ensure that all dwellings have access to high quality private open space (incl. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.

*Policy H14 Internal Residential Accommodation*

It is the policy of the Council 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.

**Policy H15 Privacy and Security**

It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.

**Section 7.1.0 Water Supply & Wastewater Policy IE1 Water & Wastewater**

It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County

**Section 7.2.0 Surface Water & Groundwater Policy IE2 Surface Water & Groundwater**

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

**Section 7.3.0 Flood Risk Management Policy IE3 Flood Risk**

It is the policy of the Council to continue to incorporate Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive.

**Assessment**

The subject proposal provides for an infill scheme of 4 no. residential units on lands currently derelict, which formerly housed a motor vehicle premises. The proposal is for 4no. 1-bedroom apartments arranged around a central stairwell in a two-storey structure with a pitched roof. The building aligns with the building line of the neighbouring houses and is similar in scale to the semi-detached houses that characterise the area. The external finishes of the building are also typical of the local semi-detached houses with a brick ground floor, rendered first floor and concrete tile/slate roof.

The distance between the rear first floor wall of the building and the boundary to the south varies between 10.7m and 18.8m. There are no windows in the side walls and no overlooking of adjacent properties. Balconies at first floor level to the rear have solid flank walls to prevent overlooking.

To the front generous landscaping surrounds a permeably paved parking area for 4no. cars. The landscaping continues to the east to include an anomalous triangular space that forms part of the legally defined site. The ownership of the residual lands between this triangular space and the neighbouring house on Hollyville Lawn is unknown, although it did form part of the motor vehicle premises. To the rear the generous garden area includes paved area with seating, raised beds to facilitate gardening for the elderly residents, and several ornamental trees.

The described development provides residential infill and strikes the balance between the reasonable protection of the existing amenities and character of adjoining dwellings in this established residential area, which character is defined by the low to medium density and low-rise architectural form.

The principal development statistics are as follows:

|                     |   |                   |   |
|---------------------|---|-------------------|---|
| Total Site Area     | – | 0.1025 ha         | (1025 m <sup>2</sup> )                      |
| Number of units     | – | 4no.              | (1-bedroom apartments @49.9m <sup>2</sup> ) |
| Gross Internal Area | - | 286m <sup>2</sup> |   |
| Residential Density | – | 39 per ha         |   |
| Plot Ratio          | – | 0.28              |   |
| Private Open Space  | – | 358m <sup>2</sup> | 35% of site area                            |

Overall, having regard to the land use zoning, the residential policies of the County Development Plan and the pattern of development in the area, it is considered that the principle of a residential development is in accordance with the Development Plan and the proper planning and sustainable development of the area.

The development of 4 Units in the proposed development would give rise to a net density of 39 units per hectare. Having regard to the existing pattern of development in the area, the open space nature of the lands and the surrounding context, it is considered that the provision of the subject density is an efficient use of land in this instance.

Open Space provided by means of Community Courtyard / shared community space – 358m<sup>2</sup> - 35 % of the total site area .The above provision meets requirements of SDCC Development Plan, section 11.3.1 (iii) Public Open Space *"In all other zones all new residential development shall be required to incorporate a minimum of 10% of the total site area as public open space. This includes community led housing for older people in established areas on lands designated with Zoning Objective "OS" (To preserve and provide for open space and recreational amenities)"*.

The proposed development meets the requirements of the County Development Plan and the Departmental guidelines in respect of private amenity space, internal room sizes etc..



Fig. 11 – Site Plan

### Screening for Appropriate Assessment

A Screening for Appropriate assessment has been undertaken by JM McConville Associates, Chartered Environmentalists. The Screening concludes as follows:

*"This screening process was carried out to ascertain if the project was likely to have significant effects on the six Natura 2000 sites within the threshold distance of the project site. If this were the case, then it would be necessary to carry out an Appropriate Assessment."*

*"Following the review of the project in accordance with the Guidance for Planning Authorities entitled "Appropriate Assessment of Plans and Projects in Ireland", this screening has established that the project poses no potential for significant effects and as such requires no further appropriate assessment."*

### **Screening for Environmental Impact Assessment**

The screening report has been prepared by JBA Consulting in relation to a Part 8 residential development on land situated at Old Lucan Roan, Palmerstown, Dublin 15.

In accordance with Article 120 (1) (b) of the Planning & Development Regulations, 2001 as amended, and having regard to the following;

- The location, size and nature of this serviced site located in an established residential area and distance from protected and/or environmentally sensitive sites,
- The proposed development is very considerably below the threshold of a mandatory EIA which would require an Environmental Impact Assessment Report (EIAR),
- The modest scale and quantum of residential development proposed and integration with adjoining land-uses,
- The description of possible effects on the environment are not considered significant and therefore further assessment pursuant to the Planning and Development Regulations 2001 as amended are not considered necessary
- An Appropriate Assessment Screening has been carried out. It concluded that the proposed development will not cause direct or indirect impacts on any Natura 2000 sites, and that Appropriate Assessment is not required.

It is considered that there is no real likelihood of significant effects on the environment arising from the proposed development, and it is concluded that an EIAR is not required.

### **Landscape / Site**

The rear and sides of the site are currently contained by high walls. These will be retained and will receive a new render finish, and cappings where necessary. New planting beds will follow the boundary walls to the rear and side, and several new ornamental trees will be planted in the rear garden. Seating is proposed to the southern end of the garden. To the front the paved parking area will be surrounded by beds with bushes and small trees. The new front wall will be rendered and capped like the houses to the west.

### **Project Partners**

Tuath Housing  
South Dublin County Council  
Department of Housing, Planning and Local Government

### **Site / Services Constraints:**

All major existing services runs have been identified for the design.

### **Internal Comments**

Will be reported at final stage of Part 8.

**Flood Risk**

DBFL Consulting Engineers have consulted OPW and ECFRAM Flood Maps and have confirmed that there is no known or projected flood risks to the site.

**Surface Water**

Surface water - requires to be fully scoped to ensure capacity of existing network. SUDS will be used in the first instance. Attenuation provision via permeable paving and tree pits, in compliance with the IW standards and the Greater Dublin Regional Code of Practice for Drainage Works.

**Irish Water**

DBFL Consulting Engineers have contacted Irish Water and have confirmed there is adequate capacity for the proposed development in the existing foul sewer and water main infrastructure directly adjacent to the site. Foul drainage has been designed in compliance with the IW standards and the Greater Dublin Regional Code of Practice for Drainage Works. Application for Foul and Water services to be completed. No known diversions.

**Roads & Roads Access**

Vehicular access is proposed to a front garden containing 4no. car parking spaces. Roads access and capacity are within acceptable and safe limits. Parking provision of 4no. spaces is considered adequate due to excellent public transport links on site and the proximity of local facilities. Visitor parking is available on street.



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