

WICKLOW COUNTY COUNCIL

**PLANNING & DEVELOPMENT ACTS 2000 (As Amended)
SECTION 5**

Director of Services Order No: 1989/2022

Reference Number: EX 74/2022

Name of Applicant: The Rehab Group C/O Cormac O'Sullivan

Nature of Application: Section 5 Referral as to whether "(a) Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes with (b) any necessary internal modifications at Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow" is or is not exempted development.

Location of Subject Site: Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow

Report from Lyndsey Blackmore EP & Suzanne White SEP

With respect to the query under Section 5 of the Planning & Development Act 2000 as to whether "(a) Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes with (b) any necessary internal modifications at Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow" is or is not exempted development within the meaning of the Planning & Development Act 2000 (as amended)

Having regard to:

- The details submitted with this section 5 application on the 21st November 2022
- Sections 2, 3 and 4 (1) h of the Planning and Development Act 2000(as amended).

Main Reasons with respect to Section 5 Declaration:

- (a) The change of use of a building from a staff training facility to a one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change from the existing use granted for the unit.
- (b) The internal modifications to the building fall under Section 4 ,(1) h of the Planning and Development Act 2000(as amended) as the works

proposed will only affect the interior of the building and do not materially affect the external structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures.

Recommendation

The Planning Authority considers that “(a) Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change of use of the lands in question and therefore is not development (b) Internal modifications purposed at Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow” is development and is exempted development as recommended in the planning reports.

Signed  Dated 13th day of December 2022

ORDER:

That a declaration to issue stating:

That “(a) Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change of use of the lands in question and therefore is not development (b) Internal modifications purposed at Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow” is development and is exempted development within the meaning of the Planning & Development Acts 2000 (as amended).

Signed:
2022



Dated 13 day of December 2022

Director of Services
Planning Development & Environment



Comhairle Contae Chill Mhantáin Wicklow County Council

Forbairt Pleanála agus Comhshaol Planning Development and Environment

Áras An Chontae / County Buildings
Cill Mhantáin / Wicklow
Guthán / Tel: (0404) 20148
Faics / Fax: (0404) 69462
Rphost / Email: plandev@wicklowcoco.i
Suíomh / Website: www.wicklow.ie

The Rehab Group
C/O Cormac O'Sullivan
Bluett & O'Donoghue Architects
2 John Street
Kilkenny
R95 EY22

13th December 2022

RE: Declaration in accordance with Section 5
of the Planning & Development Acts 2000 (As Amended)

I enclose herewith Declaration in accordance with Article 5 (2) (A) of the
Planning & Development Act 2000 in respect of the following:

Exemption Ref No: EX 74/2022

Applicant: The Rehab Group C/O Cormac O'Sullivan

Nature of Application: “(a) Proposed use of first floor for one to one
education and training with intellectually disabled
people and ancillary administration purposes with
(b) any necessary internal modifications at Southern
Cross House, Southern Cross Business Park,
Wurzburg Road, Bray, Co Wicklow”

Location: Southern Cross House, Southern Cross Business Park, Wurzburg
Road, Bray, Co Wicklow

Where a Declaration is used under this Section any person issued with a
Declaration under subsection (2) (a) may, on payment to An Bord Pleanála of
such fee as may be prescribed, refer a declaration for review by the Board within
four weeks of the date of the issuing of the declaration by the Local Authority.

Is mise, le meas,

ADMINISTRATIVE OFFICER
PLANNING DEVELOPMENT & ENVIRONMENT.



Comhairle Contae Chill Mhantáin Wicklow County Council

Áras An Chontae / County Buildings
Cill Mhantáin / Wicklow
Guthán / Tel: (0404) 20148
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Suíomh / Website: www.wicklow.ie

Forbairt Pleanála agus Comhshaol Planning Development and Environment

DECLARATION IN ACCORDANCE WITH ARTICLE 5 (2) (A) OF THE PLANNING & DEVELOPMENT ACT 2000 AS AMENDED

Applicant: The Rehab Group C/O Cormac O'Sullivan

**Location: Southern Cross House, Southern Cross Business Park, Wurzburg Road,
Bray, Co Wicklow**

DIRECTOR OF SERVICES ORDER NO. 1989/2022

A question has arisen as to whether "(a) Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes with (b) any necessary internal modifications at Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow" is or is not exempted development.

Having regard to:

- The details submitted with this section 5 application on the 21st November 2022
- Sections 2, 3 and 4 (1) h of the Planning and Development Act 2000(as amended).

Main Reasons with respect to Section 5 Declaration:

- (a) The change of use of a building from a staff training facility to a one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change from the existing use granted for the unit.
- (b) The internal modifications to the building fall under Section 4 ,(1) h of the Planning and Development Act 2000(as amended) as the works proposed will only affect the interior of the building and do not materially affect the external structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures.

The Planning Authority considers that "(a) Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change of use of the lands in question and therefore is not development (b) Internal modifications purposed at Southern Cross House, Southern Cross Business Park, Wurzburg Road, Bray, Co Wicklow"

Signed: 
ADMINISTRATIVE OFFICER
PLANNING DEVELOPMENT & ENVIRONMENT

Dated 12th December 2022

Section 5 Declaration

Ref:	74 /2022
Name:	The Rehab Group
Development:	Proposed internal modifications to building and whether the proposed works and proposed use constitute a material change of use.
Location:	Southern Cross Business Park, Wurzburg Road, Bray

Observations: The applicant is seeking a Section 5 Declaration as to whether or not the use of the first floor of Southern Cross House for the activities of the Rehab Care Division as per the ground floor and for use by the National Learning Network Division for one to one education and training with intellectually disabled people is compatible with the established use of the building and within the scope of permissions granted under prr 14/1884 and 20/621 and does the proposed use therefore constitute exempted development.

The site

The subject site is located at Southern Cross House within the Southern Cross business park in Bray Co. Wicklow. There is an existing large three storey building on the site. The ground floor is used by the Rehab care and the 2nd floor is used by Sunbeam house. The middle floor is vacant.

Planning History

There have been a number of planning applications for various alterations to the overall building

14/1884 : permission granted for change of use from office to training facility.

20/621: Permission granted for change of use of part of the first floor from day training centre to office

Question

The applicant has applied to see whether or not the following is or is not development or is or is not exempted development:

Legislative Context

-Planning and Development Act, 2000 (as amended):

Section 2 (1) defines works as including: *“Any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal”*;

Section 3 (1) defines development as: *“The carrying out of works on, in, over or under land or the making of any material change in the use of structures or other land”*;

Section 4 (1)(h) specifies development which shall be exempted for the purposes of the Act; *Development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which only affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures.*

Proposal:

The proposed development involves the following:

Proposed use of first floor for one to one education and training with intellectually disabled people and ancillary administration purposes with any necessary internal modifications.

The first floor is currently vacant and its previous use was as a day training facility for Sunbeam house.

The details submitted with this application are as follows:

- A site location map
- Drawing showing:
 - o map showing application site outlined in red
 - o Floor plans and elevations

Assessment:

The first assessment must be whether or not the works outlined above constitute development within the remit of Section 3 of the Planning and Development Act 2001. In this regard, Section 3 of the Planning and Development Act provides that:

“development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.

It should be noted that Section 2 of the Act defines works as:

“works” includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.

The proposal will involve internal modifications to a building as it is to be divided into separate sections with a potential kitchen based learning area and would therefore involve works within the meaning of Section 3 of the Act.

The second stage of the assessment is to determine whether or not the proposed works would be exempted development under the Planning and Development Act 2000 (as amended) or its associated Regulations.

The key issues of relevance are whether:

- (a) the change of use from a staff day training facility office to a one to one education and training with intellectually disabled people and ancillary administration purposes is material in planning terms. In order to determine this question, the nature of uses which are deemed to be acceptable on the site having regard to the original planning permission and the zoning associated with the area must be decided, and whether or not a one to one education and training with intellectually disabled people is compatible in land use terms with the zoning and historical uses permitted.

Planning permission was granted for the change of use of the building from office to a staff day training facility.

In 2000 permission was granted for the change of use from a day training facility to office. As this floor of the building is vacant it can be assumed that this change of use has not occurred and therefore the use granted under prr 14/1884 still applies.

The question now arises as to whether or not a change of use from a staff day training facility to use as one to one education and training with intellectually disabled people constitutes a material change of use.

From the information on file it appears that the proposed use is almost identical to the previously granted use and would therefore not be considered a material change of use.

- (b) The modifications to the building materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure of neighbouring structures,

The proposed modifications to the building are all minor internal modifications that will only affect the interior of the building and no external part of the building will be altered.

Conclusion

Arising from the assessment above therefore I consider

- (a) the use of the building as a one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change of use of the lands in question and therefore is not development.
- (b) The modifications to the building will not materially affect the external structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures

Recommendation

With respect to the query under Section 5 of the Planning and Development Act 2000, as to whether

The Development of :

- (a) Change of use from a staff day training facility to one to one education and training with intellectually disabled people and ancillary administration purposes and
- (b) Internal modifications to building is or is not exempted development

The Planning Authority considers that:

- (a) The use of the building as a one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change of use of the lands in question and therefore is not development.
- (b) The internal modifications proposed is development and is exempt development.

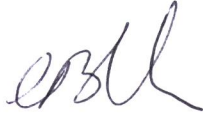
Main Considerations with respect to Section 5 Declaration:

- The details submitted with this section 5 application on the 21st November 2022
- Sections 2 ,3 and 4 (1) h of the Planning and Development Act 2000(as amended).

Main Reasons with respect to Section 5 Declaration:

- (a) The change of use of a building from a staff training facility to a one to one education and training with intellectually disabled people and ancillary administration purposes does not constitute a material change from the existing use granted for the unit.

- (b) The internal modifications to the building fall under Section 4 ,(1) h of the Planning and Development Act 2000(as amended) as the works proposed will only affect the interior of the building and do not materially affect the external structure so as to render the appearance inconsistent with the character of the structure or neighbouring structures.



Lyndsey Blackmore
Executive Planner
08/12/2022

Agreed
12/12/22

MEMORANDUM

WICKLOW COUNTY COUNCIL

TO: Lyndsey Blackmore
Assistant Planner

FROM: Crystal White
Assistant Staff Officer

**RE:- EX 74/2022 - Declaration in accordance with Section 5 of the
Planning & Development Acts 2000 (as amended)
Rehab Group to lease first floor for One to One education & training with
the intellectually disabled in an office setting at Southern Cross Business
Park, Wurzburg Road, Bray, Co Wicklow**

I enclose herewith for your attention application for Section 5 Declaration
received 21st of November 2022.

The due date on this declaration is the 16th of December 2022.



Senior Staff Officer
Planning Development & Environment

Wicklow County Council
County Buildings
Wicklow
0404-20100

21/11/2022 15 00 13

Receipt No L1/0/304915
***** REPRINT *****

CORMAC O'SULLIVAN
NO 2 JOHN STREET
KILKENNY CITY
CO KILKENNY

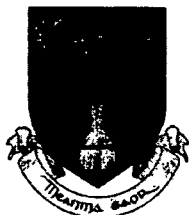
EXEMPTION CERTIFICATES	80 00
GOODS	80 00
VAT Exempt/Non-vatable	

Total 80 00 EUR

Tendered
Credit Card 80 00
SOUTHERN CROSS HOUSE BRAY

Change 0 00

Issued By Brid Keogh
From Customer Service Hub
Vat reg No 0015233H



Wicklow County Council
County Buildings
Wicklow
Co Wicklow
Telephone 0404 20148
Fax 0404 69462

Office Use Only

Date Received _____

Fee Received _____

**APPLICATION FORM FOR A
DECLARATION IN ACCORDANCE WITH SECTION 5 OF THE PLANNING &
DEVELOPMENT ACTS 2000 (AS AMENDED) AS TO WHAT IS OR IS NOT
DEVELOPMENT OR IS OR IS NOT EXEMPTED DEVELOPMENT**

1. Applicant Details

- (a) Name of applicant: **The Rehab Group**
Address of applicant: **10D Beckett Way**
Park West Business Park
Dublin 12, D12K276

Note Phone number and email to be filled in on separate page.

2. Agents Details (Where Applicable)

- (b) Name of Agent (where applicable) **Cormac O'Sullivan**
Address of Agent : **Bluett & O'Donoghue Architects,**
2 John Street, Kilkenny
R95EY22

Note Phone number and email to be filled in on separate page.

3. Declaration Details

- i. Location of Development subject of Declaration
Southern Cross House
Southern Cross Business Park
Wurzburg Road
Bray

- ii. Are you the owner and/or occupier of these lands at the location under i. above ?
Yes/ No. **The Rehab Group occupies the ground floor of the building**
- iii. If 'No' to ii above, please supply the Name and Address of the Owner, and or occupier **The owners of Southern Cross House are**
Michael & Ann Gaffney
39 Highland Avenue
The Park
Cabinteely
Dublin 18
- iv. Section 5 of the Planning and Development Act provides that : If any question arises as to what, in any particular case, is or is not development and is or is not exempted development, within the meaning of this act, any person may, an payment of the prescribed fee, request in writing from the relevant planning authority a declaration on that question. You should therefore set out the query for which you seek the Section 5 Declaration

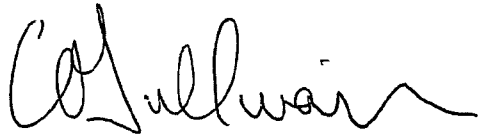
Is use of the first floor of Southern Cross House, for the activities outlined in Appendix A attached, compatible with the established use of the building and within the scope of the permissions granted in 2015 and 2020 and thus comprise exempted development ?

Additional details may be submitted by way of separate submission.

- v. Indication of the Sections of the Planning and Development Act or Planning Regulations you consider relevant to the Declaration
Ref. Appendix A attached
- vi. *Additional details may be submitted by way of separate submission.*
- vi. Does the Declaration relate to a Protected Structure or is it within the curtilage of a Protected Structure (or proposed protected structure) ? **No**
- vii. List of Plans, Drawings submitted with this Declaration Application
C22-022 Drawing 001, Site Location Map
C22-022 Drawing 002, Site Layout
C22-022 Drawing 003, Floor Plans
C22-022 Drawing 004, Section & Elevations

viii. Fee of € 80 Attached

Please call Cormac O'Sullivan for card payment on 086 6028673

A handwritten signature in black ink, appearing to read 'C O'Sullivan', with a stylized flourish at the end.

Signed : _____ Dated : 21st November 2022

Appendix A

Application for Section 5 Declaration to Wicklow County Council

Context

- The ground floor of Southern Cross House at Southern Cross Business Park in Bray has been occupied by the Rehab Group (Rehab Care Division) since 2005 as a Disability Day Service & Resource Centre.
- The second (top) floor of Southern Cross House is occupied by Sunbeam House Services Ltd. which provides a range of supports for adults with intellectual disabilities.
- The first floor of Southern Cross House is currently vacant although most of it was previously occupied by Sunbeam House Services, Planning Permissions 141884 & 20621 refer.
- The land-use zoning of Southern Cross Business Park in the Bray Municipal District Local Area Plan is E1; Employment *“to provide for the development of enterprise and employment”*

Proposal

The Rehab Group now has the opportunity to lease the vacant first floor of Southern Cross House to address the increasing demand for its services. The intention is that one half of the first floor would be occupied by the National Learning Network (NLN) Division of the Group and the other half would be occupied by the Rehab Care Division and be ancillary to the services provided at ground floor.

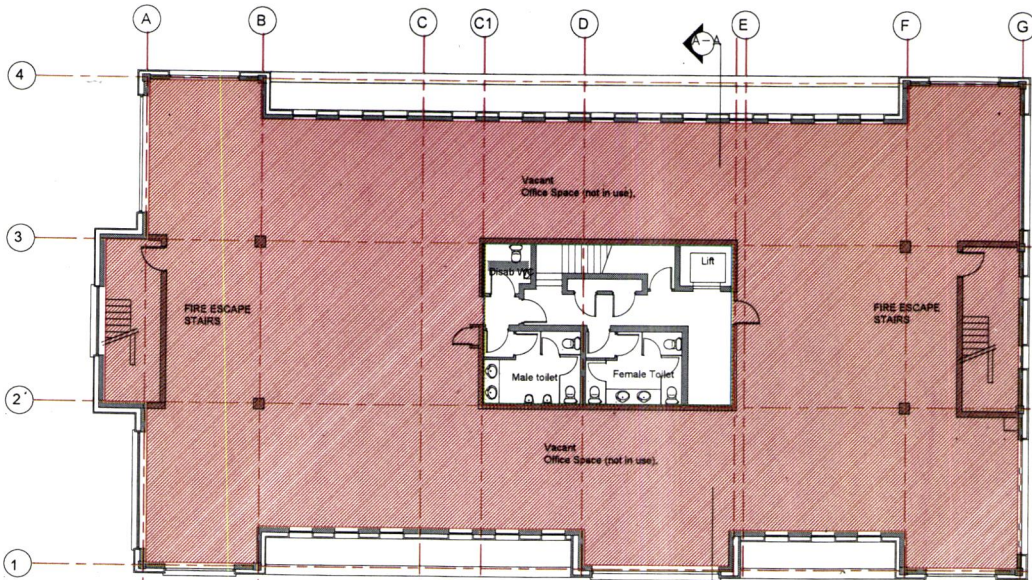
The NLN use of the accommodation would comprise Level 1 one-to-one education and training with the intellectually disabled in an office setting.

The Rehab Care use of the accommodation would comprise administration of the activities at ground floor and some office or kitchen based assistance for clients with their employment or training applications.

Request for pre-planning consultation

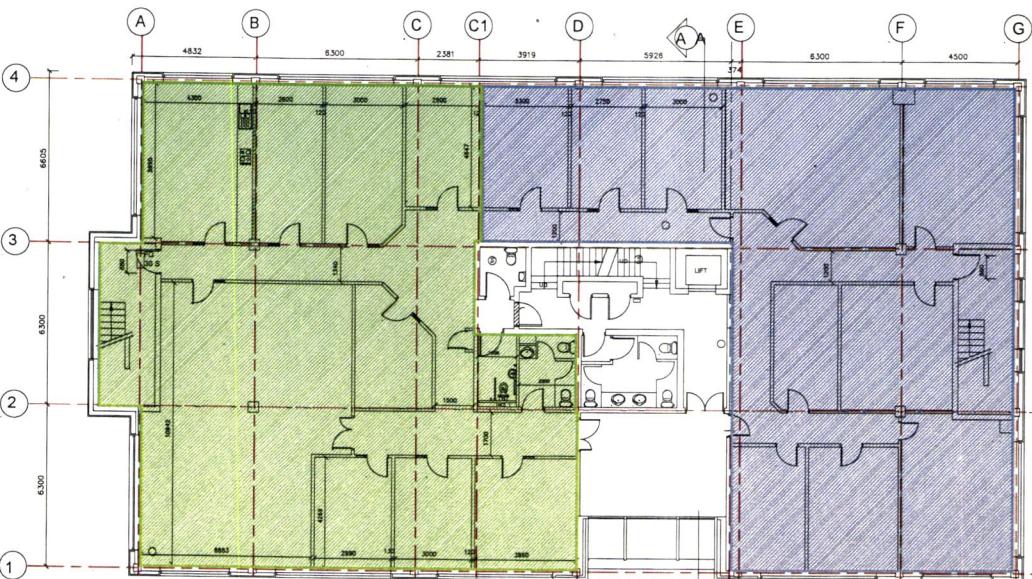
It appears to Rehab that use of the first floor of Southern Cross House for the activities outlined above is compatible with the established use of the building and within the scope of the permissions granted in 2015 and 2020 and may thus comprise exempted development.

On this basis, the Rehab Group now seek formal determination of this question by Wicklow County Council by means of a Declaration in accordance with Section 5 of the Planning & Development Acts 2000 (as amended).

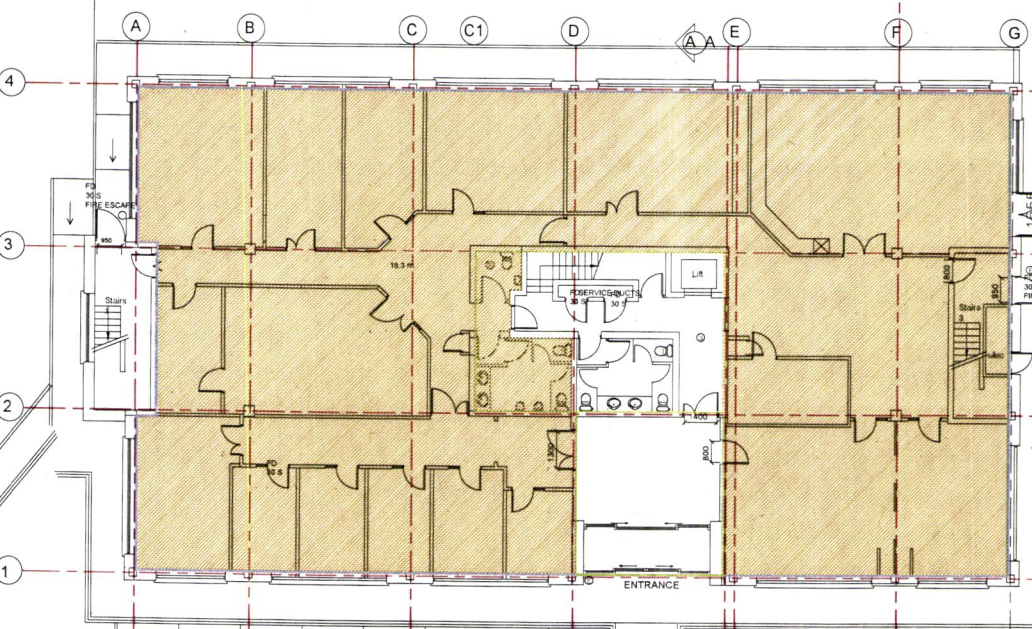


SECOND FLOOR PLAN
SCALE 1 : 200 @A3

- EXISTING SUNBEAM HSE SERVICES (2ND FLOOR)
- PROPOSED REHAB NLN (1ST FLOOR)
- PROPOSED REHAB CARE (1ST FLOOR)
- EXISTING REHAB CARE (GROUND FLOOR)

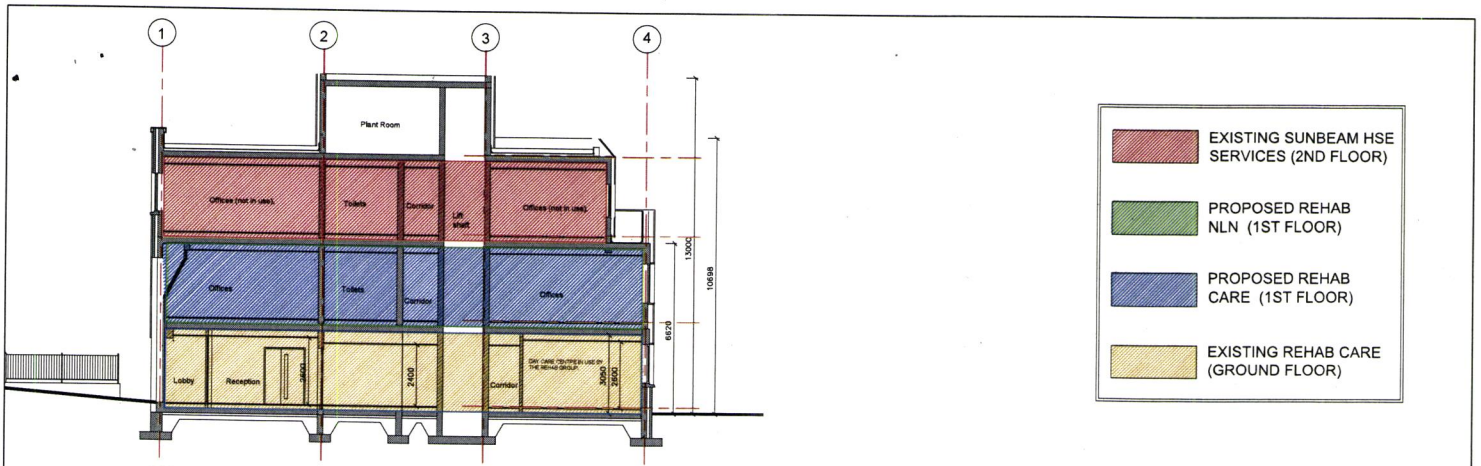


FIRST FLOOR PLAN
SCALE 1 : 200 @A3



GROUND FLOOR PLAN
SCALE 1 : 200

No.	Date	Details	By
DRAWING FOR PLANNING PURPOSES ONLY.			
BLUETT & O'DONOGHUE			
No. 17, North Wall Street Dublin 7, Ireland Tel: 01 708 1888 Email: info@bluett.com		No. 2, John Street Dublin 7, Ireland Tel: 01 708 1888 Email: info@bluett.com	
PROJECT APPLICATION FOR SECTION 5 DECLARATION AT SOUTHERN CROSS HOUSE, SOUTHERN CROSS BUSINESS PARK, BRAY CLIENT: REHAB GROUP			
EXISTING HSE FLOOR PLANS			
DRAWN BY DATE NOV 2022	CHECKED BY SCALE 1:200 @ A3	PROJECT REF C22-022	SHEET NO 003
© Copyright of Bluett & O'Donoghue Architects			

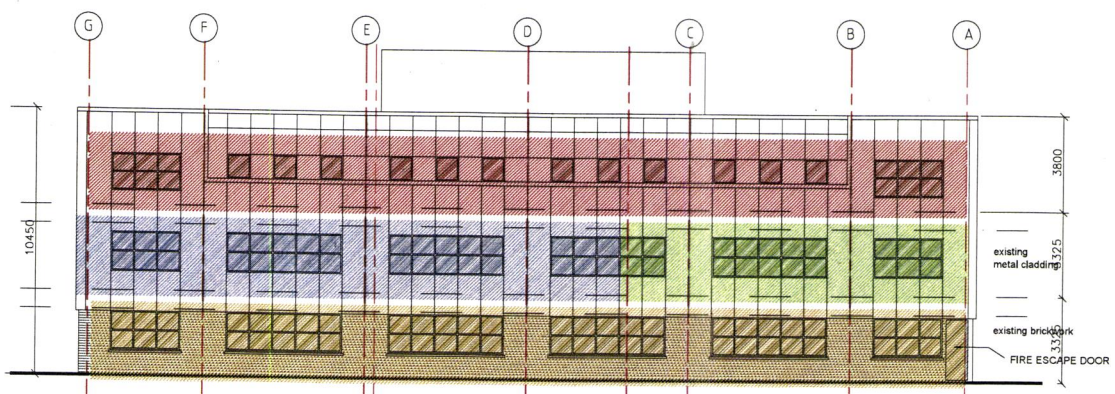


BUILDING SECTION A - A
SCALE 1 : 200 @A3

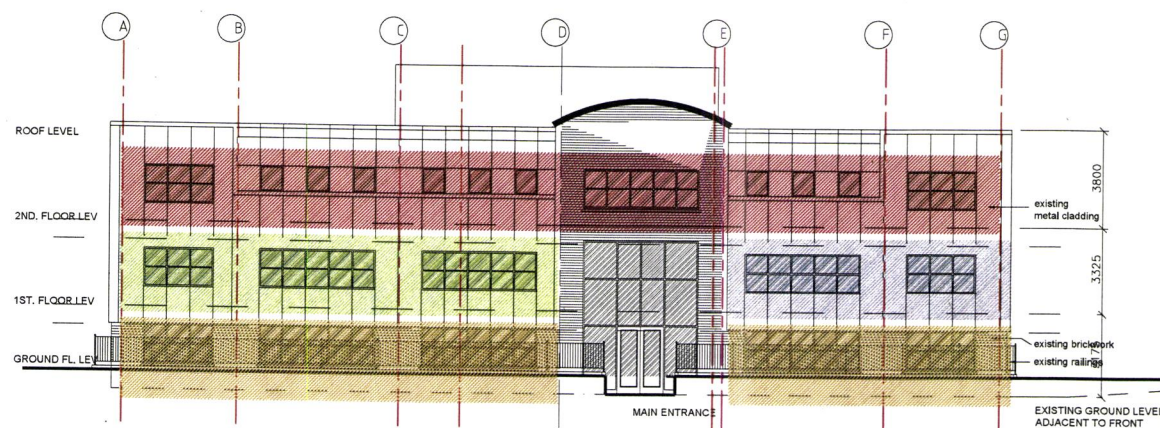


EXISTING SOUTH EAST ELEVATION
SCALE 1 : 200

EXISTING NORTH WEST ELEVATION
SCALE 1 : 200



EXISTING NORTH EAST ELEVATION
SCALE 1 : 200



EXISTING SOUTH WEST ELEVATION
SCALE 1 : 200

No.	Date	Details	By
DRAWING FOR PLANNING PURPOSES ONLY.			
BLUETT & O'DONOGHUE			
No. 11, Charleville Street, Dublin 11, Ireland Tel: 01 872 1000 Email: info@bluett.ie Web: www.bluett.ie		No. 20, John Street, Dublin 1, Ireland Tel: 01 506 0870 Email: info@odonoghue.ie Web: www.odonoghue.ie	
PROJECT APPLICATION FOR SECTION 5 DECLARATION AT SOUTHERN CROSS HOUSE, SOUTHERN CROSS BUSINESS PARK, BKA REHAB GROUP			
DRAWING TITLE SECTIONS - ELEVATIONS			
DATE 12 NOV 2022	DRAWN 12000 @ A3	PROJECT REF C22-022	DWG NO 004
© Copyright of Bluett & O'Donoghue Architects			



WURZBURG ROAD

Wurzburg Road

SITE BOUNDARY OUTLINED IN RED

ENTRANCE TO BUSINESS PARK

Access Road to Business Park

PUBLIC ROAD

SITE BOUNDARY OUTLINED IN RED

PUBLIC ROAD

RAMP ENTRANCE

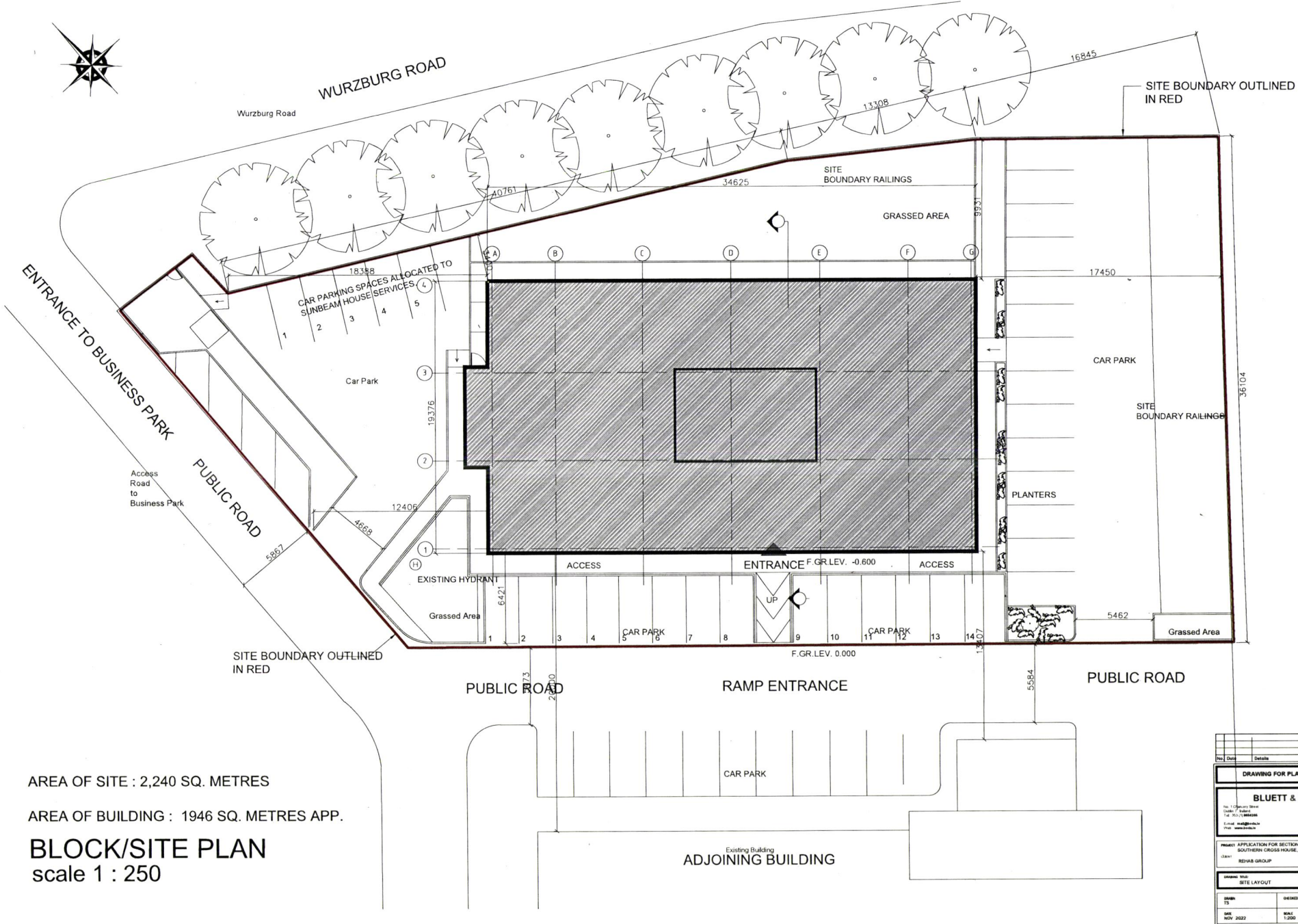
PUBLIC ROAD

Existing Building
ADJOINING BUILDING

AREA OF SITE : 2,240 SQ. METRES

AREA OF BUILDING : 1946 SQ. METRES APP.

BLOCK/SITE PLAN
scale 1 : 250



No.	Date	Details	By
DRAWING FOR PLANNING PURPOSES ONLY.			
BLUETT & O'DONOGHUE			
Mr. J. Donoghue Director 127, 131, 133, 135, 137, 139, 141, 143, 145, 147, 149, 151, 153, 155, 157, 159, 161, 163, 165, 167, 169, 171, 173, 175, 177, 179, 181, 183, 185, 187, 189, 191, 193, 195, 197, 199, 201, 203, 205, 207, 209, 211, 213, 215, 217, 219, 221, 223, 225, 227, 229, 231, 233, 235, 237, 239, 241, 243, 245, 247, 249, 251, 253, 255, 257, 259, 261, 263, 265, 267, 269, 271, 273, 275, 277, 279, 281, 283, 285, 287, 289, 291, 293, 295, 297, 299, 301, 303, 305, 307, 309, 311, 313, 315, 317, 319, 321, 323, 325, 327, 329, 331, 333, 335, 337, 339, 341, 343, 345, 347, 349, 351, 353, 355, 357, 359, 361, 363, 365, 367, 369, 371, 373, 375, 377, 379, 381, 383, 385, 387, 389, 391, 393, 395, 397, 399, 401, 403, 405, 407, 409, 411, 413, 415, 417, 419, 421, 423, 425, 427, 429, 431, 433, 435, 437, 439, 441, 443, 445, 447, 449, 451, 453, 455, 457, 459, 461, 463, 465, 467, 469, 471, 473, 475, 477, 479, 481, 483, 485, 487, 489, 491, 493, 495, 497, 499, 501, 503, 505, 507, 509, 511, 513, 515, 517, 519, 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