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OPENFIELD ECOLOGICAL  
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and

REDLINE STUDIOS

## PLANNING APPLICATION

FOR THE PROPOSED PART DEMOLITION OF AN EXISTING RESIDENTIAL BUILDING AND THE CONSTRUCTION OF 26 NO. RESIDENTIAL UNITS AND 1 NO. CAFÉ UNIT AT GREENHILLS ROAD/OLD GREENHILLS ROAD/MAIN STREET, TALLAGHT, DUBLIN 24



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## KEY PLANNING CONSIDERATIONS

**Size of Site:** c. 0.23 ha, approximately.

**Development Proposed:** The existing residential scheme (Greenhills Court), located to the west of Greenhills Road, Tallaght, comprises 17 no. residential units above basement car park. The proposed development involves the demolition of 3 no. existing residential units and the construction of 26 no. residential units and 1 no. café unit. There will 40 no. apartment units in total on site as a result of this planning application.

**Development Vision:** The vision for the proposal is to deliver a high-quality mixed-use scheme (primarily residential) with good layout and design, which will aid in rejuvenating and enhancing Tallaght Village.

**Site Description and Context Summary:** The eastern side of the subject site accommodates an existing residential scheme adjacent to Greenhills Road. The remainder of the site to the west and south remains primarily undeveloped with the exception of some hard and soft landscaped area and basement carpark. The site is located just west of the small historic village of Tallaght and Tallaght Dominican Priory and is well-served by public transport links, including a number of Dublin Bus Routes. Bus Connects core bus corridor "9: Greenhills to City Centre" is proposed to pass through the area in the near future.

**Zoning:** The site is zoned 'VC – Village Centre', which has the following zoning objective – "To protect, improve and provide for the future development of Village Centres."

### Mixed-Use Development:

- 1) The proposal comprises a total of 26 No. apartments with a dwelling mix of 5 No. Studio units (19%), 6 No. one-bedroom units (23%), 7 No. two-bedroom units (27%) and 8 no. three-bedroom units (31%).
- 2) The scheme proposes a residential density of c. 113 no. units per Ha. Considering the existing units on site, the residential density will equate to c.170.79 units per Ha (40 no. units on a site of 0.23 Ha).

- 3) The proposed apartment units comply with, and exceed in many cases, the standards contained in the 'Sustainable Urban Housing – Design Standards for New Apartments Guidelines for Planning Authorities' (2018).

- 4) The proposed ground floor café units (c. 93 sqm) will provide an attractive and active street frontage to Greenhills Road and Main Street.

**Car Parking:** A total of 15 no. car parking spaces are provided onsite\*.

**Cycle Parking:** A total of 90 No. cycle parking spaces are provided onsite\*.

### Access:

- 1) Access to a new basement level (which will replace the existing basement) will be via Old Greenhills Road, just south of the existing vehicular access. Enclosed drawings and report to demonstrate that safe sightlines and means of access / egress are achievable.

\* (See enclosed Traffic and Transport Assessment Report for further details)







General Location of Subject Site (Aerial View)

Aerial Eye view of the subject site (source: [www.googlemaps.com](http://www.googlemaps.com), cropped and annotated by Tom Phillips + Associates).







Proposed view of the Eastern Elevation

IMAGE CREDIT – TOT Architects



**1.0 INTRODUCTION**

**1.1 Proposed Mixed Use Scheme at Greenhills Road/Main Street/Old Greenhills Road, Tallaght, Dublin 24**

O' Mahony Holdings SPRL<sup>1</sup> has instructed Tom Phillips + Associates, in association with TOT Architects, PUNCH (Consulting Engineers), METEC Consulting (Consulting Engineers), Murphy + Sheanon (Landscape Consultants), ARC Architectural Consultants Ltd., AHC Ltd. (Archaeology and Heritage Consultants), Phillip J Landscape Architects, Openfield Ecological Services and Redline Studio, to prepare this planning application.

The subject site, which is c. 0.23 Ha, is located to the east of Greenhills Road, to the west of Old Greenhills Road, and to the southeast of Main Street, Tallaght, Dublin 24. The proposal seeks permission for part demolition of the existing residential scheme (known as Greenhills' Court) to the south (3 no. residential units in total) and the construction of 26 no. apartments units, including 1 no. café unit at ground floor level; and ancillary works. See Section 1.3 for further details.

**1.2 Planning Report**

This *Planning Report* outlines the general details of the proposed development and addresses the following:

- Section 1 Introduction
- Section 2 Site Location and Description
- Section 3 Planning History
- Section 4 Detailed Description of the Proposed Development
- Section 5 National and Regional Planning Policy Context
- Section 6 Local Planning Policy Context
- Section 7 Studies and Supporting Information
- Section 8 Document Submitted as Part of this Application
- Section 9 Conclusion

**1.3 Overview of the Development Proposal**

The subject site is currently developed with a residential scheme known as Greenhills' Court and comprises 17 no. apartment units in 4 no. linked apartment blocks ranging in height from 2 to 4 storey, including car parking accessed from Old Greenhills Road. The proposed development seeks the demolition of the southern portion of the existing residential scheme (3 no. units in total) and the replacement of these units with 11 no. residential units and 1 no. retail unit in a 5 to 6-storey block ('Block A'). The remainder of the site to the west will be developed with 15 no. residential units in a 3 to 5 storey block over the existing basement level ('Block B'). As a result of the proposed development, the subject site will comprise 40 no. residential units and 1 no. ground floor café unit.

The scheme is designed to fit within its context, respond to the specific site requirements and provide a mix of dwelling types and sizes supported by ancillary facilities, basement car parking and landscaped open space areas. The proposed dwelling mix is flexible to allow for a sustainable range of occupancy sizes (single persons, families etc.).

The proposed development can be broken down as follows:

- 1) A total of 26 no. apartments with a dwelling mix of of 5. No. Studio units (19%), 6 No. one-bedroom units (23%), 7 No. two-bedroom units (27%) and 8 no. three-bedroom units (31%);
- 2) 1 no. café unit (c. 93 sq m);
- 3) 15 no. car parking spaces (incl. 2 no. 'Go Car' spaces);
- 4) 94 no. bicycle parking spaces;
- 5) 2 no. separated, yet linked areas of public and communal open space (675 sq m in total);
- 6) All other ancillary spaces including waste management; bicycle storage; circulation areas; private and communal open space; footpaths; landscaping; etc.

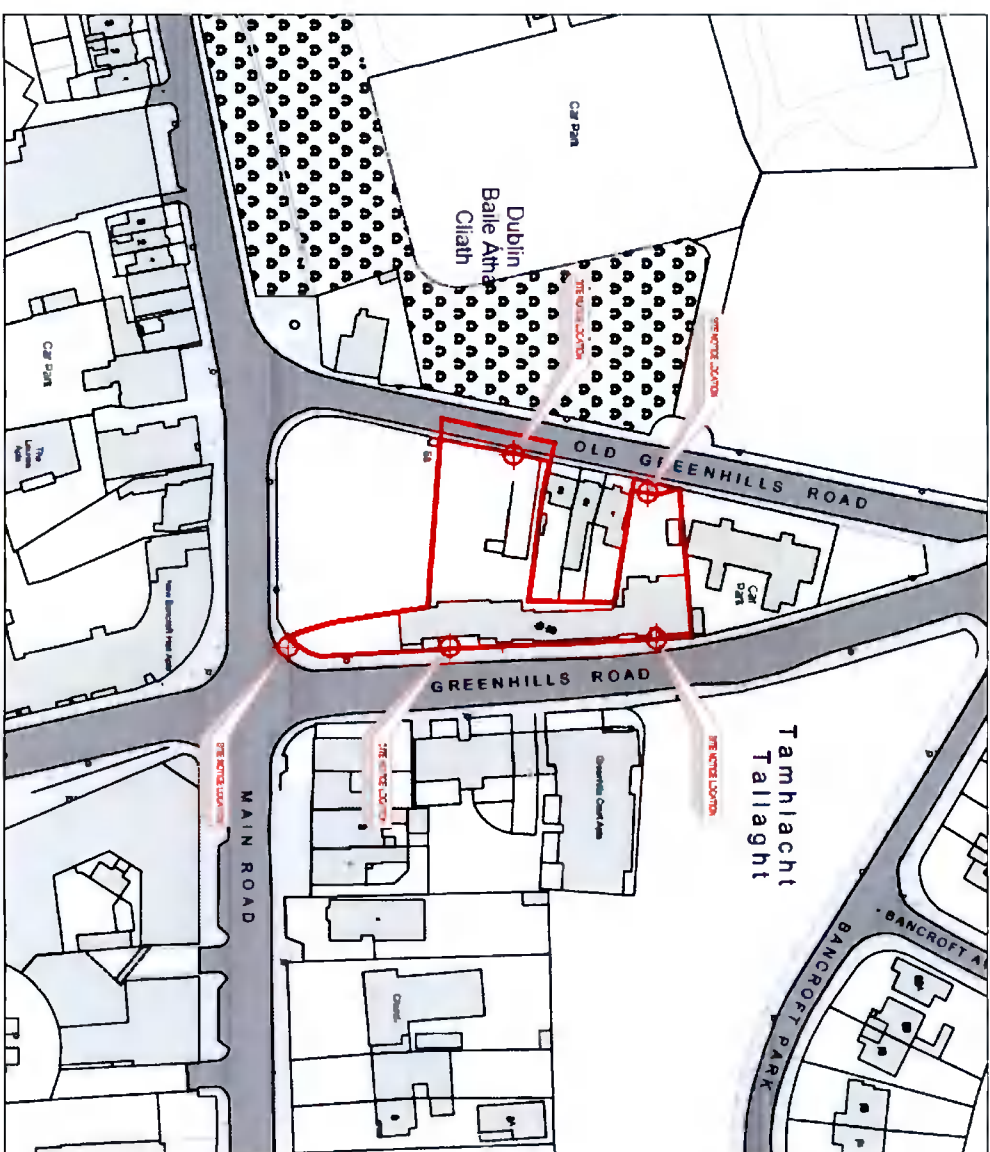


Figure 1.1 Extract from the Site Location Map (source: TOT Architects, cropped by Tom Phillips + Associates, 2021)

<sup>1</sup> Penthouse 30a, Mountbrook, A94TH90, Dublin



#### 1.4 The Zoning Context

In planning terms, the subject site is an important development opportunity in that it is suitably zoned for a residential development scheme. It is zoned 'VC-Village Centre' under the *South Dublin County Development Plan 2016-2022*, which has the following planning objective:

*"To protect, improve and provide for the future development of Village Centres."*

The proposed scheme, which includes a 'residential' and 'Restaurant/Café, land uses is permitted in principle. Therefore, the proposed scheme is deemed to be acceptable in principle on this site. Please refer to Section 5.0 below for further information in this regard.

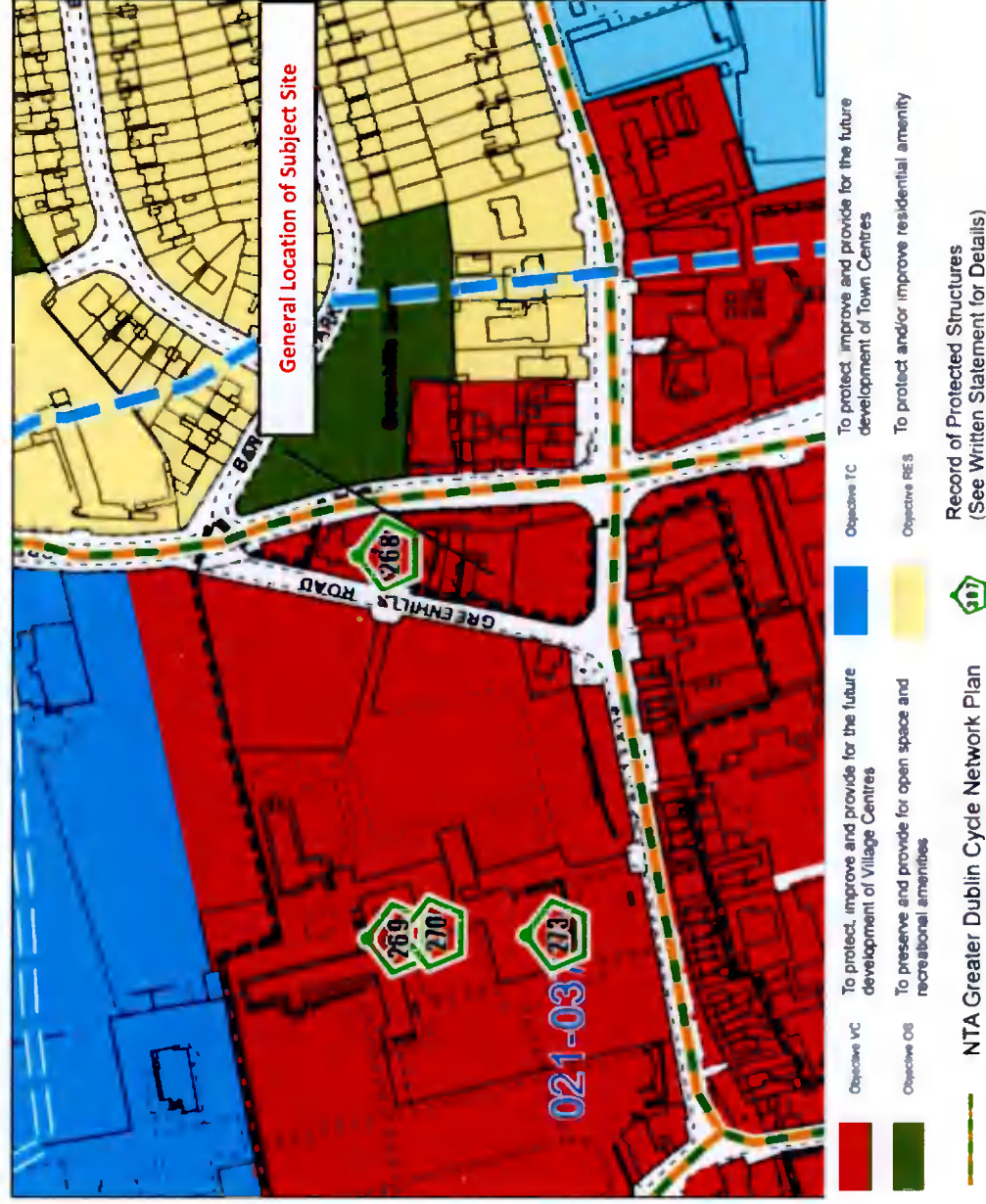


Figure 1.2 Map showing the location of the Subject Site, which is zoned VC 'Village Centre' (source: Extract from Map 9 South Dublin Development County Plan 2016-2022, annotated by Tom Phillips + Associates, 2021)

#### 1.5 Studies and Supporting Information

The information and reports submitted in support of this planning application include the following:

ITEM	PREPARED / PROVIDED BY:
Planning Report	Tom Phillips + Associates
Full set of architectural plans and drawings	TOT Architects
Design Rationale Report	TOT Architects
Architectural Heritage Impact Assessment	ARC Architectural Consultants Ltd.
Landscape and Visual Impact Assessment (LVIA)	Philip J Landscape Architecture
Archaeological Impact Assessment	AHC Ltd.
Landscape Master Plan and Cover Letter / Report	Murphy + Sheanon Landscape Architects
Photomontages	Redline Studios
Full set of engineering plans and drawings	PUNCH Consulting
Engineering Services Report	PUNCH Consulting
Traffic Assessment Report	PUNCH Consulting
Mobility Management Plan	PUNCH Consulting
Operational Waste Management Plan	PUNCH Consulting
Outline Construction Management Plan	PUNCH Consulting
Outline Construction and Demolition Waste Management Plan	PUNCH Consulting
Site Specific Flood Risk Assessment PUNCH Consulting	PUNCH Consulting
Building Lifecycle Report (incl. Sustainability Assessment)	METEC Consulting Engineers
Sustainability Statement/Energy Statement	METEC Consulting Engineers
Sunlight/Daylight Report	METEC Consulting Engineers
Public Lighting Plan	METEC Consulting Engineers
Ecological Impact Assessment	Openfield Ecological Services
Screening Report for Appropriate Assessment	Openfield Ecological Services
Part V Housing Letter from Housing Department	South Dublin County Council

Table 1.: List of Studies and Supporting Information.

A full summary of all technical reports is provided in Section 7.0 of this Planning Report.



**1.6 Pre-Planning Application Discussions**

The Applicant, represented by Tom Phillips + Associates, TOT Architects and PUNCH Consulting Engineers undertook a Section 247 pre-application meeting with South Dublin County Council (SDCC). Discussions were held with Jim Johnston (Senior Executive Planner), Barry Henn (Executive Planner) and Eoin Burke (Acting Senior Planner) together with members of the Roads, Parks, Drainage and Water Services Departments on Thursday, 11<sup>th</sup> February 2021.

The issues that were discussed included the principle of development; compliance with the Tallaght *Town Centre Local Area Plan 2020* (LAP); scheme design and layout; masterplan approach with the adjoining southern site; building height; tenure mix; privacy for existing and future residents; quality of communal amenity space; traffic, access and parking; provision and nearby sensitive receptors (ACA and Protected Structures); and compliance with development management standards and the requirement for supporting reports.

This tables below summarises the issues raised during the pre-application discussions and how these have been addressed by the Applicant. The issues raised and comments provided by the Planning Authority have been full considered and addressed in this application.

Planning	
1.	The proposed apartment scheme was considered to be acceptable in principle and in accordance with the Zoning Objective ('VC – Village centre'). SDCC noted that 'office' shown at ground floor level, is permitted in principle, however it must be less than 100 sq m in size. The proposed tenure of this ground floor space needs to be clearly outlined.  <u>Response:</u> The proposed 'office' unit has been replaced with a café unit at ground floor level on the corner of Greenhills Road and Main Street, providing an active street frontage at this busy thoroughfare.
2.	SDCC highlighted the location of nearby Protected Structures, the Tallaght Architectural Conservation Area (ACA) and other sites of archaeological potential, noting that the design of the proposal needs to be considerate of its sensitive location and setting.  <u>Response:</u> The scale, height and massing of the proposed development has been significantly scaled back from what was presented at the pre-application meeting. The application is also accompanied by a Landscape and Visual Impact Assessment, Architectural Heritage Impact Assessment and Archaeological Impact Assessment which demonstrates that the proposed development will not have any negative impacts on nearby sensitive receptors.
3.	SDCC highlighted Policy RE 2 in the LAP which states a minimum of 30% of units within any new residential development should be three-bedroom.  <u>Response:</u> The number of 3-bedroom units has increased to 8 no. units (previously 6 no.), equating to 31% of the overall dwelling mix, thereby complying with Policy RE2 of the LAP.
4.	In relation to building height, SDCC had concerns with the 7-storey structure to Main Street outlining that the land was not envisaged to have tall buildings above what is considered appropriate within the LAP. Additionally, concerns were also raised regarding the abrupt increase in building height between the existing 4 storey block and proposed Block A. SDCC also highlighted

	that the quality of the communal open space would be diminished due to the 7 storey element (overshadowing, wind impacts etc.)  <u>Response:</u> The proposed building height has been significantly reduced from 5 to 7 storeys to 3 to 6 storeys. The transition in the building height between the existing block and the proposed development is not as abrupt and is instead gradual when viewed from the surrounding streets, as depicted in the enclosed architectural drawings, design statement, visual assessment and photomontages.
5.	SDCC considered that the proposal is premature on the basis that the adjoining site lies undeveloped and could potentially be developed in the near future.  <u>Response:</u> The Applicant has attempted to engage with the adjoining landowner to encourage a collaborative approach towards the redevelopment of both sites. However, it has transpired that the adjoining landowner does not intend to redevelop the site in the near future. TOT Architects have designed the proposed scheme to ensure that the proposed development does not preclude the redevelopment of adjoining lands and is cognisant of potential future opposing windows on the adjoining undeveloped site.
6.	SDCC considered that the plot ratio (2.48) was too high. The LAP identifies a plot ratio range of 0.75:1 – 1:1.  <u>Response:</u> The plot ratio slightly exceeds the recommended plot ratio in the Tallaght. We refer the Planning Authority to Section 6.3.1 of this Report which provides a rationale as to why the plot ratio of 1.63 is considered appropriate.
7.	SDCC had concerns regarding the setback distances from opposing habitable room windows causing potential privacy issues for future occupants of the proposal, and existing residents within the vicinity.  <u>Response:</u> The minimum setback distance between opposing habitable room windows has increased from 8m to a minimum of 22m. The position of habitable room windows and the inclusion of high-quality landscaping at ground floor level offers additional screening for existing and future residential units.
8.	The ground floor windows looking into the communal open space were highlighted as a privacy concern.  <u>Response:</u> High-quality landscaping has been included along the perimeters of the communal open space offering adequate screening to all ground floor units. We refer the Planning Authority to the enclosed Landscape Master Plan and associated plans, prepared by Murphy + Sheanon Landscape Architects for further details.
9.	SDCC noted the site as being previously used as a petrol station, details of decontamination should be provided with the planning application.  <u>Response:</u> The subject site has never been used as a petrol station. The adjoining site was formally developed with an Esso Service station which has been demolished for over 14 no. years ago. The assessment of the recently refused planning application SD20A/0250 on the adjoining site highlighted no concerns regarding potential contamination.



10.	<p>Inclusion of energy efficient infrastructure was recommended by SDCC.</p> <p><u>Response:</u> The application includes a Building Lifecycle Report and Sustainability report/Energy Statement which demonstrates the measures taken to ensure the proposal accommodates energy efficient infrastructure where possible.</p>
11.	<p>SDCC considered that the quality of the communal open space was poor due to the 7-storey height proposed and would need to be carefully examined prior to lodgement.</p> <p><u>Response:</u> The proposed scheme has been significantly modified and reduced in scale and massing to ensure that all open space areas are of high quality and not subject to any undue micro climatic conditions. The enclosed Daylight, Sunlight and Shadow Assessment, prepared by Metec Consulting Engineers, demonstrates that all open space areas will have access to appropriate levels of sunlight throughout the day.</p>
<p><b>Drainage and Water Services</b></p>	
1.	<p>SDCC advised that a breakdown of surface types and surface areas for surface water drainage should be provided and natural attenuation should be included where possible. Regarding attenuation, SDCC advised that details on reliability should be included with the application, along with a breakdown and backup scenario. Attenuation and pumping should be segregated from the residential units and the ongoing maintenance of the tank should be included. A Flood Risk Assessment should be undertaken.</p> <p><u>Response:</u> Please see enclosed Engineering Services Report, prepared by PUNCH Consulting Engineers) which provide full details on surface water drainage and attention. A Flood Risk Assessment is also enclosed.</p>
2.	<p>Regarding attenuation, SDCC advised that details on reliability should be included with the application, along with a breakdown and backup scenario. Attenuation and pumping should be segregated from the residential units. Ongoing maintenance of the tank should be outlined (cleaning etc.). SuDs should also be included where possible.</p> <p><u>Response:</u> Please see enclosed Engineering Services Report, prepared by PUNCH Consulting Engineers which provides full details on the above. Please also refer to Drawing No. 202253-PUNCH-XX-XX-DR-C-0150, prepared by PUNCH Consulting Engineers and the enclosed landscape and architectural drawings for full details on SuDs measures.</p>
<p><b>Roads Department</b></p>	
1.	<p>SDCC noted that the application should be mindful of the location of BusConnects along Greenhills Road</p> <p><u>Response:</u> The BusConnects proposal is not expected to affect the development. Vehicle access is from Old Greenhills Rd via a new ramp to the basement car park, just south of the existing basement entrance. Full details of access arrangement is provided in the enclosed engineering drawings prepared by PUNCH Consulting Engineers.</p>
2.	<p>Car parking standards should meet the Apartment Guidelines (2018), Electric charging (10%) and mobility spaces (5%) should also be provided.</p> <p><u>Response:</u> A total of 15 no. car parking spaces (including 2 no. shared 'GoCar' spaces) and 94 no. bicycle spaces are provided. See enclosed Mobility Management Plan and Traffic and</p>

	<p>Transportation Assessment, prepared by PUNCH Consulting Engineers, for full rationale on the number of parking spaces being provided to serve the proposed development and Section 6.5.9 of this Report.</p>
3.	<p>SDCC outlined that a Construction Waste and Demolition Management Plan, Construction Traffic Management Plan, Mobility Management Plan (to include cycle strategies) and a Traffic and Transport Impact Assessment should be included with the application.</p> <p><u>Response:</u> PUNCH Consulting Engineers have prepared the above listed report and are enclosed with the application.</p>
4.	<p>Focus should be centred on footpaths (min. 2m in width) and entry points to the site. Overall accessibility is important.</p> <p><u>Response:</u> Access to the site for residents is provided at various points via Greenhills Road and Old Greenhills. All internal footpath are a minimum of 2m in width. Please see the enclosed architectural drawings and landscaping drawings for further details.</p>
<p><b>Landscaping and Children's Play Space</b></p>	
1.	<p>SDCC noted that 10% of the gross site area for public open space (POS) should be provided and accessible to the public. All access points should be clearly shown throughout the development. Microclimate assessments should be included with the planning application.</p> <p><u>Response:</u> 10% of the site is provided and is fully accessible to the public. We refer the Planning Authority to the enclosed Landscape Drawings, prepared by Murphy + Sheanon Landscape Architects which shows full details on the accessible public open space provided within the scheme.</p>
2.	<p>SDCC had concerns regarding the accessibility of the public open space and highlighted a number of initiatives within the LAP for enhancing links from Greenhills Road to Bancroft Park (See Key Objectives for Greenhills (GH1-GH5). SDCC highlighted at preplanning that the LAP included initiatives for enhancing links to Bancroft Park and noting Key Objectives GH1-GH5 for Greenhills.</p> <p><u>Response:</u> These specific LAP objectives pertain to the Greenhill neighbourhood (Area 5), rather than The Village (Area 3). However, it is recognised that high quality streetscapes are central to objectives within the LAP for Greenhills Road and this has been provided. We refer the Planning Authority to the enclosed Landscape Drawings, prepared by Murphy + Sheanon Landscape Architects which shows full details on the accessible public open space provided within the scheme.</p>
3.	<p>A Children's Play Area has been provided in accordance with the <i>Apartment Guidelines, 2018</i>. We note the minimum private open space requirements have been met, or exceeded.</p> <p><u>Response:</u> A Children's Play area (81 sqm) has been provided to the north of the development and meets the minimum requirements set out in the Apartment Guidelines, 2018.</p>



## 2.0 SITE LOCATION AND DESCRIPTION

### 2.1 Site Location and Urban Context

The subject site is an infill urban site located to the east of Tallaght in Dublin. The site is approximately 2,342 sq m (c.0.23 ha) and forms part of a larger triangular landbank bounded by St. Basil's Training Centre ('Youthreach Priority') to the north, 3 no. cottages to the west and a brownfield undeveloped site (former Esso Service Station) to the southwest. It has frontage to Greenhills Road to the east, Main Street to the southeast corner and Old Greenhills Road (cul-de-sac) to the west, where primary vehicular access is obtained. It is currently developed with a residential scheme known as Greenhill's Court, permitted under SDCC Reg. Ref. SD04A/0731 (ABP Ref. PL06S.210123) and comprises 4 no. linked apartment blocks ranging in height from 2 to 4 storeys, including car parking accessed from Old Greenhills Road.

Figure 2.1 below is an aerial photograph showing the physical characteristics of the site and the surrounding area. The enclosed Site Location Plan, prepared by TOT Architects, shows the full extent of the subject site outlined in red.



Figure 2.1: Aerial Photograph showing the subject lands outlined in red (source: Google Maps, cropped and annotated by Tom Phillips + Associates, 2021.)

The subject site is located within a mixed urban area comprising both residential and commercial buildings. The rectangular landmark, wherein the subject site sits, is located on the edge of the Tallaght Architectural Conservation Area (ACA). St. Mary's Dominican Priory is located less than c.150m west of the site and is sufficiently screened from view by mature trees and vegetation.

St. Basil's Training Centre, a detached ten-bay single-storey training centre (c.1940) is a designated Protected Structure (RPS Ref. 268) adjoins the northern site boundary. Directly east, on the opposite side of Greenhills Road, lies the remainder of the Greenhill's Court Complex and two storey commercial buildings which front Main Street. Main Street comprises of a mix of commercial buildings of between 2 and 4 storeys. There are a number of recent higher-density housing developments within the wider area ranging in height from 4 to 10 storeys.

The area is well served by public transport. The Square Tallaght Luas station (Red line), serving Tallaght and Connolly Station/The Point, is located c. 1.2km west of the subject site and there are a number of regular bus services which connect the subject site to this station. There are several Dublin Bus stops located directly adjacent the site on Greenhills Road and on Main Street serving Nos. 27, 54A and 65 bus routes. The Square Tallaght Shopping Centre and other nearby bus stops serve several bus routes including Nos. 27, 54a, 65, 76a, 77-N and 77a.

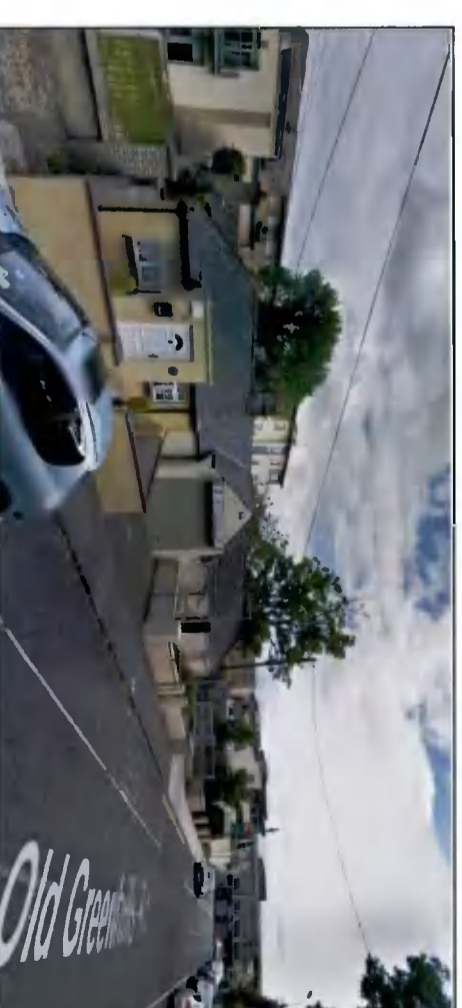


Figure 2.2: Existing single storey buildings to the north of proposed Block B, fronting Old Greenhills Road (source: Google Maps, cropped by Tom Phillips + Associates, 2021.)



Figure 2.3: Existing vacant site on the corner of Main Street and Greenhills Road (source: Google Maps, cropped by Tom Phillips + Associates, 2021.)



### 3.0 PLANNING HISTORY

#### 3.1 Why Review Planning History?

Planning history is reviewed in order to ascertain if previous applications on the subject site have raised any concerns either from those making submissions/observations on the applications (and appeals against decisions) or concerns raised by the planning officers considering the applications/appeals or if precedents have been established by previous planning permissions. Once such concerns have been identified, whatever proposal is in hand can be configured, insofar as is possible, to address them. The planning history of adjacent structures and sites will also be examined.

All planning applications are recorded in a Planning Register kept by the relevant Local Authority. Whilst every effort is made to carry out a detailed planning history search, it is important to note that our findings are only as accurate as the Planning Authority's available records.

#### 3.2 Planning History Of Subject Site – An Overview

We have carried out a planning search using the South Dublin County Council (SDCC) and An Bord Pleanála (ABP) websites in order to establish the planning history of the subject site.

In summary, there are five applications pertaining to the subject site. The parent permission, Reg. Ref. SD04A/0731 (ABP Ref. PL06S.210123) permitted the construction of 19 no. residential units and 2 no. retail units. Due to economic circumstances, this planning permission was never fully implemented. As such, the subject application seeks to fully complete the existing development, and, in addition, provide much needed residential units within Tallaght Village (See Table 1 below).

##### 3.2.1 Site 3a, Greenhills Road, Tallaght, Dublin 24

REG. REF. (ABP REF.)	DEVELOPMENT PROPOSAL	DECISION
SD06A/0541 (PL06S.219756)	2 no. 2 storey bed townhouses as part of development approved under planning permission (Reg. Ref. SD04A/0731) with car parking, landscaping and associated site works.	<b>SDCC Refuse Permission</b> (21 <sup>st</sup> August 2006) <b>ABP Grant Permission</b> (4 <sup>th</sup> April 2006)
SD04A/0731 (PL06S.210123)	4 no. from 2 to 4 storeys in height. The proposed development comprised 21 no. apartments (comprising of 10 no. 1 beds, 11 no. 2 beds), 2 no. retail units (Block C4), 1 no. temporary advertising board, ancillary accommodation, landscaping, 21 no. surface car spaces accessed from Old Greenhills Road and associated site works.	<b>SDCC Grant Permission</b> (19 <sup>th</sup> November 2004) <b>ABP Grant Permission</b> (25 <sup>th</sup> July 2005)
SD04A/0324	2 No. buildings ranging from 2 to 4 stories over basement car parking containing 26 no. car spaces. The proposed development comprised 30 No. apartments (12 no. 1 beds, 13 no. 2 beds, 3 no. 3 beds and 2 no. 3 bed duplex units), 1 no. temporary advertising board, ancillary accommodation, landscaping, 4 no. surface car spaces and associated site works.	<b>SDCC Refuse Permission</b> (1 <sup>st</sup> July 2004)

REG. REF. (ABP REF.)	DEVELOPMENT PROPOSAL	DECISION
SD03A/0368 (PL06S.204649)	Mixed use scheme consisting of 3 no. buildings ranging from 3 to 4 storey building comprising 37 no. apartments, 2 no. retail units, creche and underground carparking (24 no. spaces in total) with blocks A (two storey) and B (three storey) on either side of the cottages fronting onto the Old Greenhills Road and Block C (four storey) fronting onto New Greenhills Road on the site known as 'Site 3A'.	<b>SDCC Grant Permission</b> (15 <sup>th</sup> September 2003) <b>ABP Refuse Permission</b> (24 <sup>th</sup> February 2004)
SD03A/0367 (PL06S.204653)	4 no. buildings ranging from 2 to 4 storeys over basement car parking containing 82 no. spaces. The proposed development comprised 1 no. creche, 2 no. retail units, 78 no. apartments (comprising of 28 no. 1 beds, 31 no. 2 beds, 14 no. 3 beds and 5 no. 2 bed duplex units), 2 no. temporary advertising boards, Tallaght, Dublin 24) ancillary accommodation, landscaping and associated site works.	<b>SDCC Grant Permission</b> (15 <sup>th</sup> September 2003) <b>ABP Split Decision</b> (24 <sup>th</sup> February 2004) <b>Grant Permission for the proposed development on site 3B</b> <b>Refuse Permission the proposed development on site 3A</b> (subject site).

Table 1: Overview of Planning History of subject site (source: planning history search using <http://www.sdbulincoco.ie>, collated by Tom Phillips + Associates, 2021.)

Planning permission was initially granted for Reg. Ref. SD03A/0368 by DCC on the 15<sup>th</sup> September 2004, This decision was appealed by a third party to An Board Pleanála (ABP. Ref. PL06S.204649) and was subsequently overturned. Permission was refused having regard to the configuration of the site and related site constraints. The Board considered that the proposal would result in overdevelopment of the site, under provision of car parking, predominantly single-aspect form units facing onto Greenhills Road and a monolithic appearance adjoining the petrol station (now demolished).

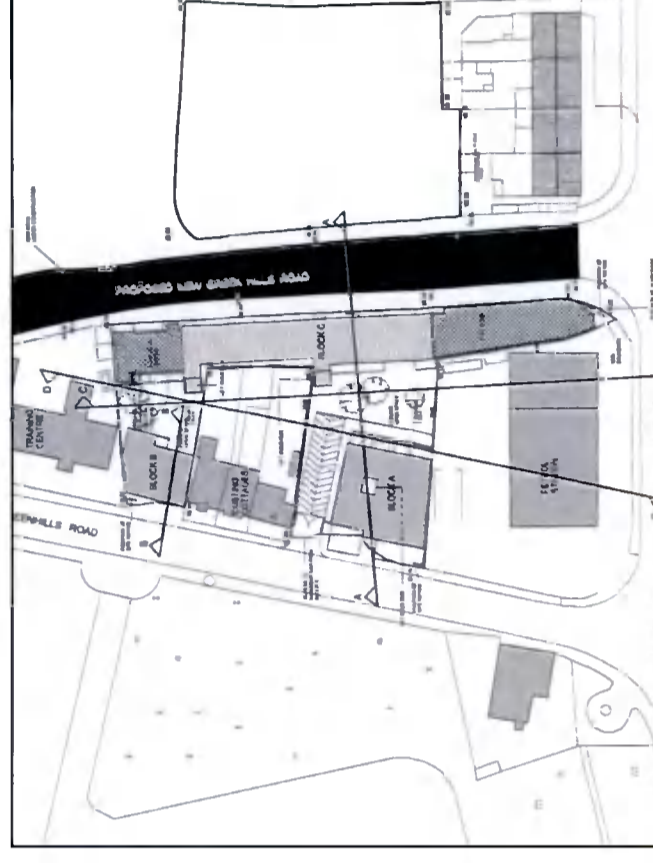


Figure 3.1 Proposed Site Plan under Reg. Ref. SD03A/0368; ABP. Ref. PL06S.204649 (source: SDCC Planning Portal, cropped by Tom Phillips + Associates, 2021.)



The applicant subsequently lodged another planning application (Reg. Ref. SD04A/0324) which aimed to address the reasons for refusal under Reg. Ref. SD03A/0368; ABP Ref. PL06S.204649. The application was refused permission by DCC having regard to the configuration of the site, the proximity of the proposed development to existing 1 and 2 storey buildings to the east and south, inadequate amenity space, the provision of private gardens adjoining a major urban distributor road, and the inadequate onsite parking provision. The proposal was considered to be overdevelopment by virtue of substandard residential amenity for future occupants and would injure the visual amenity of the area.

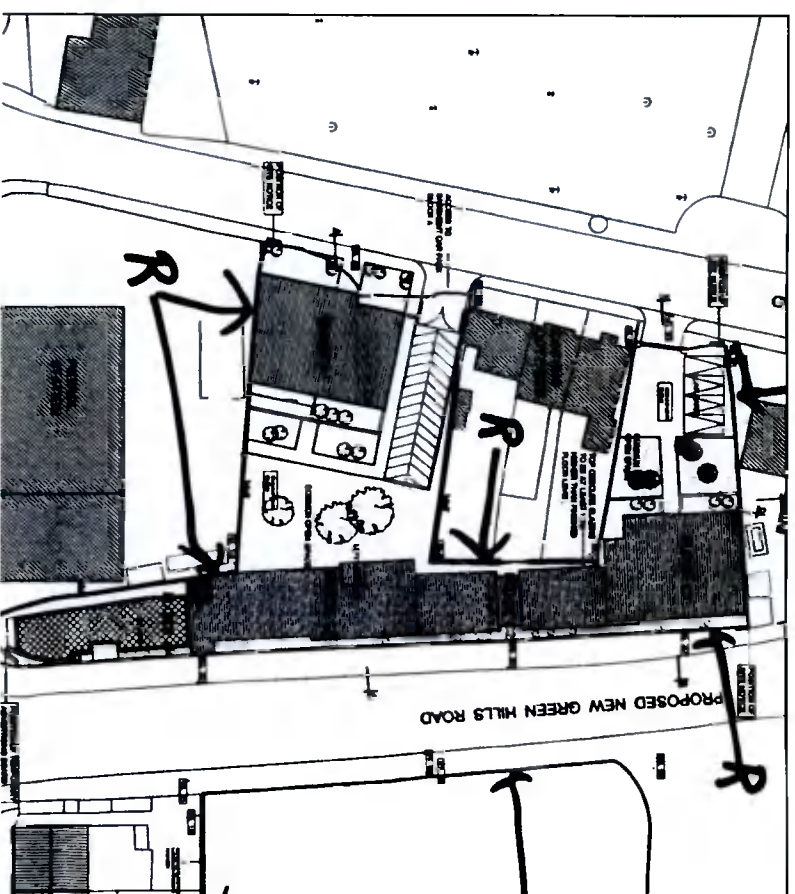


Figure 3.2. Proposed Site Plan under Reg. Ref. SD04A/0324 (source: SDCC Planning Portal, cropped by Tom Phillips + Associates, 2021.)

The **parent permission**, Reg. Ref. SD04A/0731, was lodged with the Planning Authority on 28th September 2004. It sought permission for the existing 4 no. linked apartment blocks on the subject site which range from 2 to 4 storeys in height. The application comprised 21 no. apartments (10 no. 1 beds, 11 no. 2 beds), 2 no. retail units, 1 no. temporary advertising board, ancillary accommodation, landscaping, 21 no. surface car spaces accessed from Old Greenhills Road and associated site works). Permission was granted by SDCC on 19<sup>th</sup> November 2004, and, subsequently, by An Bord Pleanála on appeal on 25<sup>th</sup> July 2005.

During the assessment of the appeal, the Board welcomed the applicant to make a submission with regard to:

1. The location of the site in the historical centre of Tallaght where the area was zoned 'CT' in the Development Plan for the area, it was considered that the layout proposed, which included two elements of surface car parking on a prominent frontage on Church Road might fail to provide a proper standard of street frontage in a central location.
2. The inadequate standard of private open space and aspect.

In response to this, the applicant made a submission, dated 24<sup>th</sup> May 2005, which included the replacement of all surface car parking on Church Road with basement car park, with a total of 21 no. car parking spaces, replacement of apartment units with townhouses, increase in the private and communal open space provision (created by omission of surface parking) and increased setbacks to adjoining properties. Condition No. 1 of Reg. Ref. SD04A/0731; ABP Ref. PL06S.210123 attached by the Board excluded the 2 no. semi-detached, two-storey, one-bed townhouses proposed on adjacent to Old Greenhills Road. As such, 19 no. residential units (8 no. one-bed and 11 no. two-bed apartments) were permitted under the parent permission.

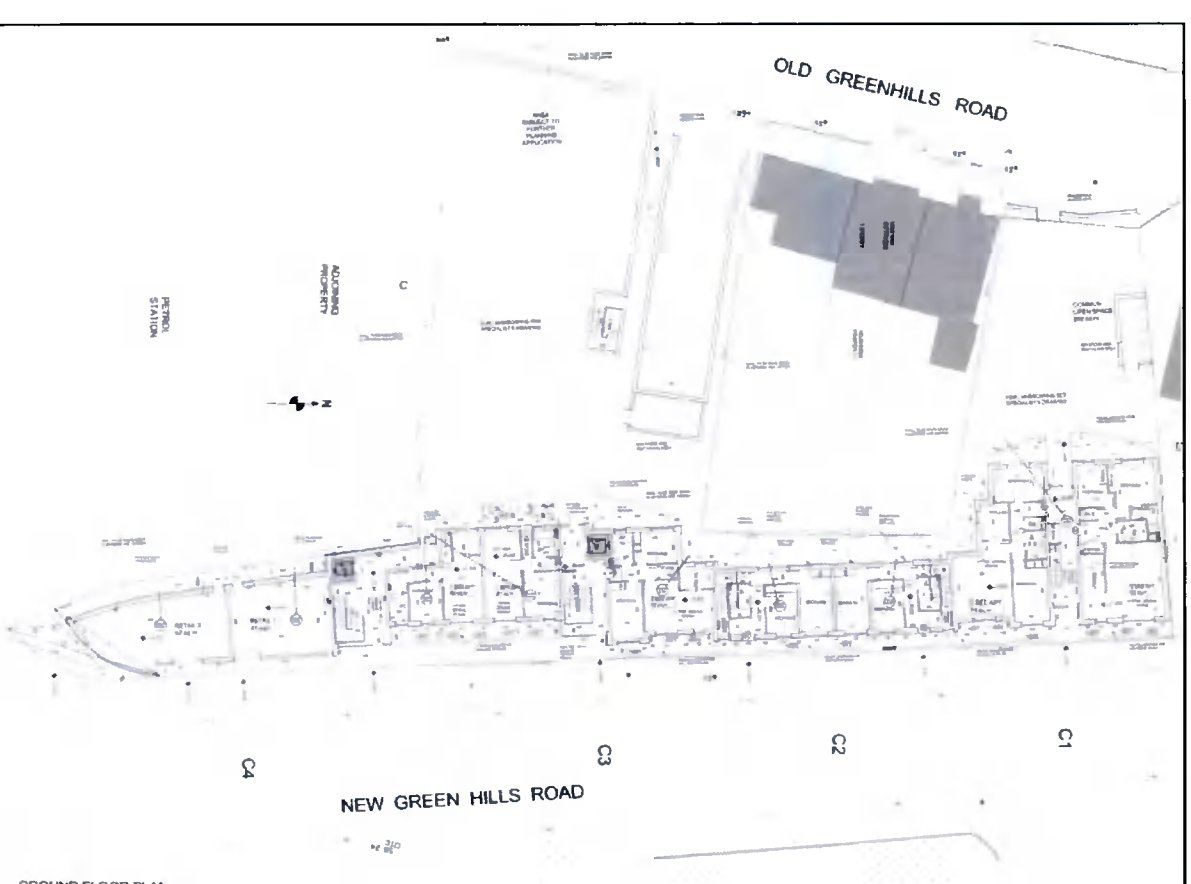


Figure 3.3 Ground Floor Plan which form part of the compliance submission for Reg. Ref. SD04A/0731; ABP Ref. PL06S.210123 (source: SDCC Planning Portal, cropped by Tom Phillips + Associates, 2021.)

The overall scale of the proposed development had been reduced from the previously refused planning applications, Reg. Refs. SD04A/0324 and SD03A/0368 (PL06S.204649). The footprint of the proposed development was similar to previous proposals however one block (Block A proposed under Reg. Ref. SD04A/0324) had been omitted. Therefore, no buildings extended to Old Greenhills Road.



It is important to note that due to the economic downturn the proposed development permitted under Reg Ref. SD04A/0731 (PL06S.210123) was never fully completed. The 2 no. retail units and the 2 no. residential units above located on the southeast corner of the subject site were never constructed, therefore 17 no. residential units remain onsite.

A separate planning application was lodged thereafter for the development of the 2 no. 2 storey townhouses adjacent to Old Greenhills Road under Reg. Ref. SD06A/0541. Planning permission was refused by SDCC on 28<sup>th</sup> September 2006. This decision was subject to First Party appeal and permission was subsequently granted by An Bord Pleanála on 4<sup>th</sup> April 2007. This permission was never implemented.

### 3.2.2 Planning History of Adjoining Site – Greenhills Road, Tallaght, Dublin 24 – An Overview

REG. REF. (ABP REF.)	DEVELOPMENT PROPOSAL	DECISION
SD07A/0883 (PL06S.229207)	Construction of mixed retail/residential development of 27 no. apartments (6 no. 3-bedroom apartments, 17 no. 2-bedroom apartments and 4 no. 1-bedroom apartments) and 3 no. ground floor retail units on 4 floors over basement car park, modification/extension to and incorporating parts of site of former petrol station site and approved development under construction, Reg. Ref. SD04A/0731 with vehicular parking access through approved development under construction.	<b>SDCC Grant Permission</b> (15 <sup>th</sup> April 2008) <b>ABP Grant Permission</b> (16 <sup>th</sup> December 2008)
SD20A/0250	The proposed development consisted of: South building ranging from 5 storeys to 8 storeys comprising; 28 no. residential units; 3 no. commercial units - shop (newsagent, parcel delivery drop store) or Community Centre; shop (cycle store/charity shop) or shop (financial/professional services) or Healthcare. West building ranging from 4 storeys to 5 storeys comprising 15 no. residential units; Commercial unit (Cafe/restaurant/Deli); Communal amenity courtyard and public open space; public realm improvements of Old Greenhills Road; basement car park comprising 25 no. residents car parking spaces and 50 no. long stay cycle parking; waste management facilities; A new vehicular entrance from the Old Greenhills Road to the proposed basement; 24 no. surface level cycle parking spaces; installation of a raised pedestrian crossing at the southern end of Old Greenhills Road and all ancillary site development works.	<b>SDCC Refuse Permission</b> (25 <sup>th</sup> November 2020)

Table 2: Overview of Planning History of surrounding lands (source: planning history search using [www.sduibincoco.ie](http://www.sduibincoco.ie), collated by Tom Phillips + Associates, 2021.)

Reg. Ref. SD07A/0883 (PL06S.229207) included part of the subject site adjacent to Old Greenhills Road, the remainder comprised the former petrol station site north of Main Street Tallaght. The Old Greenhills Road frontage consisted of a 2 and 3-storey apartment development, separated from the existing cottages to the north by basement entrance from Old Greenhills Road.

In our view, the most significant, and most recent, planning application in the immediate vicinity is **Reg. Ref. SD20A/0250**, which involved a mixed-use proposal for residential and retail development located between the Old Greenhills Road, Main Street and the Greenhills Road, within Tallaght Village Centre (Former Esso Service Station). The proposal comprised 2 no. buildings ranging in height from 4 to 8 storeys

over basement level and consisting of 43 no. residential units comprising 4 no. studio units, 22 no. 1-bedroom apartments, 13 no. 2-bedroom apartments and 4 no. 3-bedroom apartments and 4 no. commercial units. The application also included a new vehicular entrance from the Old Greenhills Road to the proposed basement. SDCC refused permission for the development on 25<sup>th</sup> November 2020 citing 6 no. reasons for refusal.



Figure 3.4 Ground Floor Plan submitted as part of Reg. Ref. SD20A/0250 (source: SDCC Planning Portal, cropped and by Tom Phillips + Associates, 2021.)



Figure 3.5 Southern elevation plan (fronting Main Street, Tallaght) submitted as part of Reg. Ref. SD20A/0250 (source: SDCC Planning Portal, cropped by Tom Phillips + Associates, 2021.)



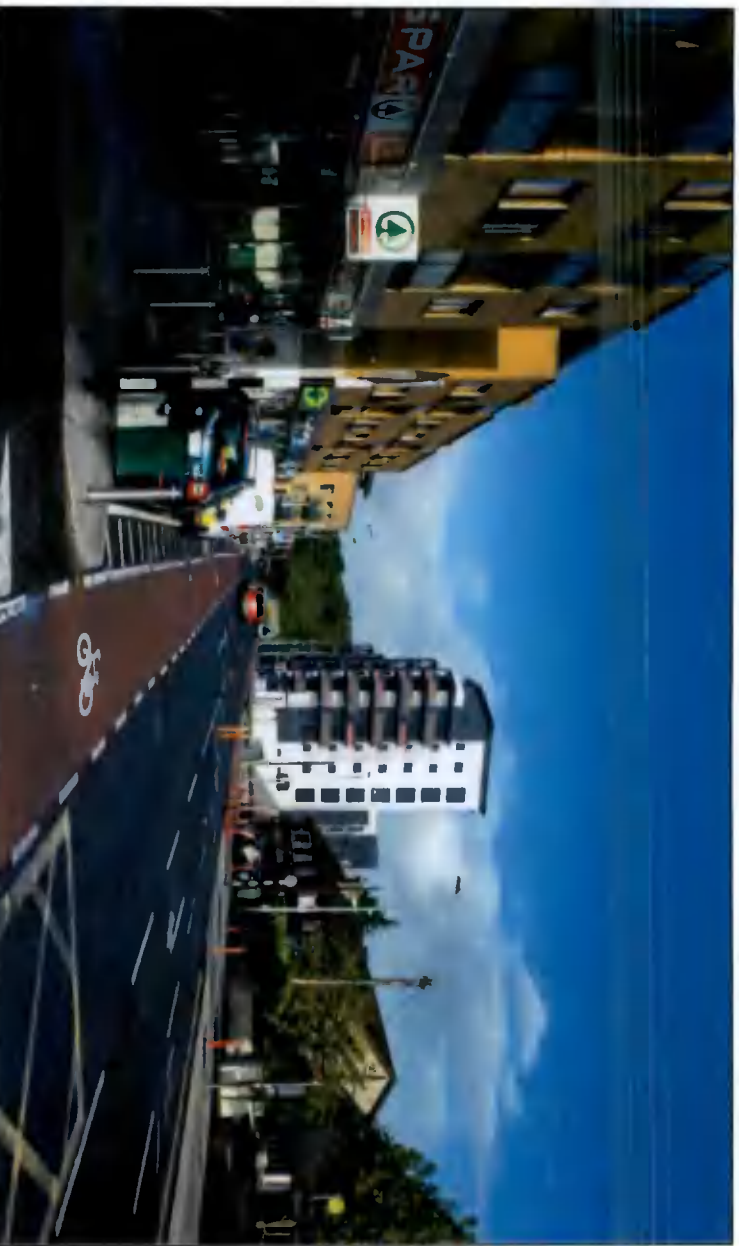


Figure 3.6. Photomontages submitted as part of Reg. Ref. SD20A/0250 showing the proposed development on approach from the east on Main Street (source: SDCC Planning Portal, cropped by Tom Phillips + Associates, 2021.)

### 3.2.3 Reg. Ref. SD20A/0250 - Reasons for Refusal – Mixed Use Development At Greenhills Road, Tallaght, Dublin 24 (Adjoining Site)

Planning permission was refused for the construction of a mixed-use scheme comprising 43 no. Build to Rent (BTR) residential units and 4 no. commercial units at ground (street) level under Reg. Ref. SD20A/0250. The site is located on the adjoining brownfield lands to the south of the subject site, at a prominent location with primary frontage to Main Street, Tallaght. The application sought permission for 2 no. buildings; the ‘South’ building (5-8 storeys) with main frontage to Main Street, Tallaght, and the ‘West’ building (4-5 storeys) with main frontage to Old Greenhills Road, with an overall GFA of 4,104 sq m. The range of commercial uses included café/restaurant/deli, community centre/newsagent/parcel delivery drop store and financial or professional services/healthcare/estate agency.

As discussed previously, the application was refused for 6 no. reasons, summarised as follows:

1. Excessive density, plot ratio and height given the context of the site within the ‘Village Centre’.
2. Failure to justify residential units and tenure mix.
3. Poor standard of accommodation for future residents.
4. Excessive overlooking to existing properties.
5. Failure to fully consider the future Bus Connects route resulting in potential traffic hazard; and
6. Surface water drainage concerns.

#### ‘Village centre’ zoning objective and surrounding context

The Planning Authority considered that the proposed residential density (253 units/ha), which is largely based on the scale and height of the proposed development, did not respond to the context of the site and surrounding village area, and was therefore not considered appropriate. The tallest part of the south building was 8-storeys, which would be significantly above the heights in the surrounding area (characterised by 2-4 storey buildings) and above the height strategy set out in the LAP which identifies the site as being on a secondary route, accommodating heights of up to 4-6 storeys residential, or 3-5 commercial. As well as exceeding the recommended building height, the tallest building (South building) would sit adjacent to the Main Street frontage and be highly visually dominant, and highly visible from all approaches. Additionally, the overall, bulk and mass of the proposal meant that the plot ratio (1.37) was also exceeded with a stated range of between 0.75:1 and 1:1 deemed most appropriate for Tallaght Village.

As such, SDCC considered that the proposed development by way of density, plot ratio and height, as well as poor design, would fail to integrate and respond to the site and surrounding context, the Priority Protected Structure and the Architectural Conservation Area (ACA), resulting in an incongruous feature that would significantly detract from the visual amenity and character of the area. As a result, the proposed development would contravene the Village Centre ‘VC’ land zoning objective.

#### Residential unit and tenure mix

The proposed development included 43 no. residential units comprising 4 no. studio units (9.3%), 22 no. 1 bed units (51%), 13 no. 2bed units (30%) and 4 no. 3-bed units (9.3%).

Objective RE 2 of the LAP states:

*“It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses, but excluding student accommodation schemes) shall have a minimum of 3 bedrooms.”*

9.3% of the overall housing mix comprised 3-bedroom units which was significantly below the 30% requirement as per Objective RE 2 outlined above. The proposal also included a high proportion of studio and 1-bedroom units (60% combined total) and the application failed to demonstrate a need for such accommodation, based on local demand and the demographic profile of the area. As such, The Planning Authority considered that the proposal would be contrary to Policy H10 (Mix of Dwelling Types) of the *South Dublin County Development Plan 2016-2022* and Objective RE 2 of the LAP, and therefore warranted refusal.

#### Standard of Accommodation

The Planning Authority had concerns regarding the size and useability of private amenity spaces to the apartment units, which were primarily in the form of narrow balconies and lack of adequate communal space (42 sqm) for future residents. It is considered that the overall standard of accommodation provided would not be sufficient for a number of units. Access to light to a number of kitchen areas and overlooking were also highlighted as concerns which warranted refusal of the application.



### Overlooking to neighbouring properties

The Planning Authority noted a distance of 22m between directly, facing habitable room windows is required to avoid any undue overlooking. Directly facing habitable room windows with setback distances significantly below the 22m requirement were observed on floors levels 1-7, giving rise to overlooking and privacy concerns between the proposed and existing windows on the opposite side of Main Street.

### Location of future Bus Connects route

The National Transport Authority (NTA) made a submission to application raising concerns regarding the impact of the proposed roads layout on the proposed BusConnects, Corridor 9 (Greenhills to City Centre), more specifically:

- The location of a raised uncontrolled pedestrian crossing along Old Greenhills Road near the junction with Main Road.
- To facilitate bus priority route the removal of existing on street parking on Old Greenhills Road is required, therefore on-street parking or loading should be provided off-street.
- Access will only be the south.

The Planning Authority were keen to comply with all NTA requirements regarding BusConnect Corridor 9.

### Surface Water Drainage

The Planning Authority Water Services have raised two significant concerns in relation to the proposed foundation and surface water sewer. Given the other concerns (as outlined above) with the proposal, it was considered that this would warrant refusal of the application.

### 3.4 Surrounding Planning History – An Analysis

We submit that the following key town planning issues are relevant in respect of the proposed development. This is arising from our review of the planning history, and the recently refused planning application on the adjoining site to the south (Reg. Ref. SD20A/0250):

- 1) Village Centre and nearby sensitive receptors;
- 2) Variety of residential unit typologies;
- 3) Quality of communal and private open space;
- 4) Access, parking and proposed BusConnects Corridor; and
- 5) Residential amenity for existing and future occupants.

It is important to note that the above is not an exhaustive list of planning issues that have influenced this planning application, but rather are a distillation of the issues identified by the pre-application process and review of the relevant planning history files. The application has however been influenced by the planning issues raised by SDCC in its assessment of Reg. Ref. SD20A/0250.

TOT Architects have designed the scheme to be fully cognisant of the village setting and surrounding sensitive receptors. The planning application is supported by a number of assessments carried out by suitably qualified professionals (e.g. Archaeological Assessment, LVIA, Architectural Heritage Impact

Assessment etc.) which show that the proposal will not have any negative or undue impacts on nearby Protected Structures, the ACA or the historic village of Tallaght.

The scheme includes an appropriate mix of units types which can accommodate single person and larger families and there is be dominance of any one unit type. The high quality communal open space is fully assessable and useable to existing and future residents and includes space for toddlers, children, teenagers, and adults. The inclusion of a water features and 'work from home' space encourages residents to spend time outside in a comfortable and inviting setting. The communal open space has been strategically designed and located to allow for future integrated of the site to the south. The private open spaces to each residential unit (balconies and terraces) are large enough to accommodate table and chairs and will have access to appropriate levels of sunlight throughout the day.

The proposed development also includes secure car parking and cycle parking at basement level and the location of the new access to the basement is cognisant of the future BusConnects Route along Old Greenhills Road. The proposed development will not give rise to any undue overlooking or privacy concerns due to the inclusion of appropriate screening and separation distances between opposing windows. Internal daylight levels to all units are fully compliant with the BRE Guidelines.



**4.0 DETAILED DESCRIPTION OF PROPOSED DEVELOPMENT**

**4.1 Detailed Description of Proposed Development**

The development description, as outlined on the Statutory Notices is as follows;

*“O’Mahony Holdings SPRL intend to apply for permission for development at this site of approximately 0.23 ha which is generally bounded to the north by St. Basil’s Training Centre, to the east by Greenhills Road, to the west by Old Greenhills Road, and at the southeastern corner by Main Street, Tallaght, Dublin 24. The subject site is currently partly developed with an existing residential scheme known as Greenhill’s Court comprising 17 no. apartment units in 4 no. apartment blocks ranging in height from 2 to 4 storeys, including basement car park.*

*The development will consist of: the demolition of 3 no. existing apartment units (c. 239 sqm) and bin store (c. 18 sq m) and the construction of a residential development arranged in 2 no. building blocks, (Block A and Block B) ranging from 3 to 6 no. storeys in height over basement level (c. 3728 sq m, including basement). Block A comprises 11 no. residential apartments (c. 1256 sq m) in a 5 to 6 storey building, and including a ground floor level café (c. 93 sq m) at the building’s southeastern corner. Block B comprises 15 no. residential apartments (c. 1393 sq m) in a 3 to 5 storey building. The proposed development will comprise 26 no. new residential units (5 no. studio apartments, 6 no. 1-bedroom apartments, 7 no. 2-bedroom apartments and 8 no. 3-bedroom apartments), with associated balconies and terraces. The proposed development will comprise a total of 40 no. apartment units derived from 26 no. new apartments and 14 no. existing apartments.*

*The development will also consist of: Relocation of existing basement access on Old Greenhills Road and the upgrade and extension of the existing basement level; provision of internal footpaths; landscaped communal open space (including outdoor gym equipment, children’s play area and ‘working from home’ area); public open space; 13 no. car parking spaces and 74 no. long-stay bicycle parking spaces and 1 no. motorcycle parking spaces at basement level; 2 no. shared car parking spaces and 20 no. short-stay bicycle parking spaces at surface level (15 no. car parking spaces, 94 no. cycle parking spaces and 1 no. motorcycle parking in total); all piped infrastructure and ducting; elevation treatments; plant room; lift access and stair cores; hard and soft landscaping and boundary treatments; changes in level; waste management areas; attenuation tank; backup generator; solar photovoltaic panels; lighting; and all associated site development and excavation works above and below ground.”*

**4.2 Key Site Statistics**

The principal details of the proposed development are as follows:

**4.2.1 Proposed Apartment Scheme**

Total Site Area	c. 0.32 Ha (c. 2,342 sq m)
Total Demolished Gross Floor Area	257.7 sq m (3 no. units + bin store compound)
Total Proposed Gross Floor Area	4779.97 sq m
Residential Apartments	26 No. Units (40 no. in total)
Car Parking	15 No. Carpark Spaces (incl. 2 ‘GoCar’ spaces)
Cycle Parking	94 No. Bicycle Spaces
Motorbike	1 no. Motorbike Space

A total of 26 no. apartments with a dwelling mix of 5 no. studio units (19%), 6 no. one-bedroom units (23%), 7 no. two-bedroom units (27%) and 8 no. three-bedroom units (31%).

A review of the proposed apartment scheme is included under Section 4.3 below.

**4.3 Proposed Apartment Scheme – Detailed Description**

**4.3.1 Design Rationale/Appraisal**

TOT Architects have prepared a *Design Statement* in respect of the proposed development, outlining how the scheme design has evolved and the manner in which it will integrate into its surrounding environment. A key part of that report is an assessment of the proposal against the *Urban Design Manual – A Best Practice Guide* and that its 12 design criteria. The document is enclosed as a separate report.

**4.3.2 Integration with Existing Area**

The proposed scheme has been designed to integrate with the existing Greenhills Court development and the surrounding vicinity and creates positive street frontages to Old Greenhills Road, Greenhills Road and Main Street, Tallaght. The proposed built form will consist of a compact design comprising apartments and a café unit, which is cognisant of the particular site constraints that apply in this instance.

Car parking and bicycle stores for residents are located at basement level and can be accessed via existing and proposed stairs and lifts. Vehicular and bicycle access to the basement is via a new ramp from Old Greenhills Road. The application site comprises a large apartment building (Greenhill’s Court) to the west, paved surfaces and small areas of horticultural/ornamental planting which are of low ecological value.

The design response has sought to orientate the buildings to maximise street level activity and maximise ground level access. Passive surveillance of these areas, including communal and open spaces, will help to create an attractive and comfortable human scale for residents and visitors to the area.

The land to the southwest is currently vacant and in terms of the layout proposed, the applicant is not in a position to include these lands in this application due to separate ownership. It is acknowledged that the Planning Authority have a strong desire to see the whole site developed concurrently. The Applicant has tried on numerous occasions (over a six year period) to facilitate this however this is not possible in the



short to medium term. We submit that the proposal has been designed to be cognisant of the future development of these lands and should not constrain any future development of the adjoining lands to the south.

This development proposal allows for a building height setback from the existing single storey buildings to the north. In addition, the proposed scheme includes high-quality materials throughout and suitable articulation and vegetative screening to provide an attractive visual form. Building material include two types of the bricks (darker on the background and lighter colour dominating brick façade) while a contrasting approach is applied to façade design of the stair core (curtain wall glazing with metal spandrel panel). The use of render has been generally avoided. The materials are, therefore, reflective of the existing residential scheme on site (Greenhill's Court) and surrounding residential environment where brick and glass have been generously utilised in other schemes, such as at New Bancroft Hall.

Furthermore, the layout of the proposed scheme and the location of Greenhills Road and Main Street provides generous separation distances from the properties to the east (two storey commercial units) and south (New Bancroft Hall) thereby minimising any potential overshadowing or overlooking impacts. There is a separation distance of over 22m between habitable room windows of proposed Block B and the existing Greenhills Court. In addition, proposed landscaping along the interface of the ground floor residential units facing into the communal open space will help to mitigate any potential, perceived visual impact, or overlooking caused by the proposed scheme. Ground floor units with direct street frontage include privacy strips of at least 1 metre. A planting buffer will also be provided to the front of the existing residential units fronting Greenhills Road (eastern façade) which will enhance the public realm leading to Bancroft Park.

It is, therefore, considered that the proposed scheme will integrate well with the existing and preferred character of the surrounding area.



Figure 4.1 CGI image of the existing Greenhills Court (right of image) and proposed Block A with primary frontage to Greenhills Road (source: TOT Architects, cropped by Tom Phillips + Associates, 2021.)



Figure 4.2 Image shows the front elevation of Block B (Old Greenhills Rd) (source: TOT Architects, cropped by Tom Phillips + Associates, 2021.)

#### 4.3.3 Impact on Neighbouring Sites

We submit that the proposed scheme will not have a negative impact on the amenity of existing nearby properties. The provision of landscape planting along the site perimeters and within the public and communal open space will assist in the protection of privacy for existing and future residents at ground floor level. Permitted building heights within the immediate vicinity are between 2 and 5 storeys in height. The proposed scheme has a maximum height of six storeys on the corner of Greenhills Road and Main Street. Block A (5 to 6 storeys) is orientated along a north to south axis and will adjoin the existing 4 storey Greenhills Court. The buildings to the east of the application site comprise of commercial units which front onto the Main Road with heights that range from 2 to 4 storeys. There is a generous separation distance of c. 19-20m between proposed Block A and these units due to the location of Greenhills Road which ensures that any potential overshadowing or loss of daylight will be minimised. There is separation distance of c. 22m provided between the most southerly point of Block A (balconies) and The New Bancroft Hall (3 storeys) on the opposite side of Main Street to the south of the site. As such, the proposal allows for adequate setback distances and seeks to create a strong desirable presence at an important site within Tallaght Village which positively addresses the junction between Greenhills Road and Main Street.





Figure 4.3 Extract of the Proposed Ground Floor Plan (Drawing No. 19118\_PA-207) which shows the proposed landscaping and minimum separation distances from nearby neighbouring properties. (source: TOT Architects, cropped by Tom Phillips + Associates, 2021.)

There are 3 no. single storey cottages directly north of proposed Block B with frontage to Old Greenhills Road, the most northerly of which appears occupied. Further north of these cottage is St. Basil's Training Centre (Protected Structure). The building height reduces to 3 storey directly adjacent to these single storey buildings thereby ensuring no undue overshadowing or overlooking occurs on these properties.

#### 4.3.4 Visual Impact and Massing

The proposed development has been designed to a high-quality standard with a particular focus on presenting a visually attractive interface on all elevations. It is envisaged that vacant adjoining site to the southeast (former Esso Service Station site) will be developed in the future and the design of the proposed development has been cognisant of this. As such the southern elevation of Block B and the western elevation of Block A includes 50 mm projected bricks providing a visual interest for the temporary exposed facade when viewed from Main Street. Block B also includes perforated brick wall at the ground floor (basement access ramp enclosure) providing additional architectural feature element. An appropriate visual scale and massing has been produced within the development, with materials selected of a high standard and visual interest.



Figure 4.4 View from Main Street towards Old Greenhills Rd (South-West corner of Block B) (source: TOT Architects, cropped by Tom Phillips + Associates, 2021.)

We refer the Planning Authority to the enclosed Architectural Design Statement which includes a comprehensive overview of the design rationale and Drawing No. 19118-PA-400 which includes a full palette of materials, both of which have been prepared by TOT Architects. The enclosed Landscape and Visual Impact Assessment (LVIA), prepared by Philip J Landscape Architects, has identified that the proposed development will set comfortably within the surrounding landscape and receiving environment. Additionally, the photomontage views of the proposed development, prepared by Redline Studios, demonstrates the appropriate urban form across a range of viewpoints.

We submit that each building is of a suitable scale and design in response to the site and surrounding village context, including the location of the nearby Protected Structures and the Architectural Conservation Area (ACA).



#### 4.3.5 Pedestrian Connectivity

The proposed scheme has been designed to create of a highly walkable and cycleable environment that offers pedestrian and bicycle users direct access and route choice throughout. The scheme has been designed to fully integrate with the existing residential scheme. Block A, Block B and Greenhill's Court will be interconnected, each having direct access to the communal open space areas including the outdoor gym equipment and the 'working from home' space. Pedestrian access will be via front door entrances to each proposed residential block at ground floor level from Old Greenhills Road to the west and Greenhill Road to the east. Access to the communal areas for Greenhill's Court residents is via 2 no. existing entrances from Greenhills Road. The proposed development includes wide footpaths and public lighting throughout. Public open space access is via a footpath entrance within the northern section of the site adjacent to the children's play area which will also facilities connections to the Priory. The café unit fronting Main Street will have 2 no. separate entrances to the public via Greenhills Road and Main Street. The proposed development site is therefore well connected to the surrounding area.

#### 4.3.6 Cycling Parking Facilities and Connectivity

Main Street, Tallaght includes a high-quality cycle lane which is located just south of proposed Block A and approximately 45 metres south of the entrance to the basement level parking. Cycle parking will be divided between visitor cycle parking spaces and residential cycle parking spaces, with residential parking spaces provided within secure, sheltered cycle parking compounds at basement level (74 no. bicycle spaces in total).

This is in accordance with the Apartment Guidelines, which states:

*"The design of apartment schemes should ensure that bicycle parking spaces are secure, covered and located to be conveniently accessible to residents, both in terms of proximity to access points i.e. stair/lift cores to apartments and routes to the external road/street network. Care should be taken to avoid conflict with car parking provision, with particular regard to access routes and obstructions such as ramps, pillars or acute turns, if provided underground."*

Short term cycle parking for 20 no. bicycles, is proposed at highly visible, readily accessible adjacent to the proposed café at the Main Street and Greenhills Road junction and adjacent to the proposed children's playground to the north of the site. These are to be designed for ease of use by the general public.

#### 4.3.7 Development Potential of Adjacent Site

The proposed development will not reduce/remove the development potential from the neighbouring site. The western elevation of Block A and the southern elevation of Block B are designed without any glazing elements thereby allowing the vacant southern site to be developed to its full potential without having to be overly mindful of severe potential overshadowing/overlooking impacts to existing residential units. Additionally, the design solutions incorporated into these otherwise blank facades will be visually interesting, and there will be no overdominance of blank walls when viewed from and Main Street. Additionally, the communal open space has been designed to (potentially) allow for its future extension and integration with the southern adjoining site.

## 5.0 NATIONAL AND REGIONAL PLANNING POLICY CONTEXT

### 5.1 Introduction

The planning considerations addressed in this section are:

#### 1. National Planning Considerations

- 1) *National Planning Framework – Project Ireland 2040;*
- 2) *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
- 3) *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2018;*
- 4) *Urban Design Manual; A Best Practice;*
- 5) *Design Manual for Urban Roads and Streets (DMURS) (2013);* and
- 6) *Part V of the Planning and Development Act 2000: Guidelines (2017).*

#### 2. Regional Planning Considerations

- 1) *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy, June 2019 (RSES).*

### 5.2 National Planning Policy Considerations

#### 5.2.1 Project Ireland 2040 – National Planning Framework, 2018;

The recently published *National Planning Framework* (NPF) confirms that 50% of overall national future population growth will be directed to the five cities of Dublin, Cork, Limerick, Galway and Waterford and that "a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites".

In considering the unit types which will required to meet this target the Plan confirms that "apartments will need to become a more prevalent form of housing, particularly in Ireland's cities". The following NPF objectives are relevant to the current application:

National Policy Objective 11: - "In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth".

National Policy Objective 13: - "In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth".



*These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected”.*

National Objective Policy 27: - *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages”.*

National Policy Objective 32: - *“To target the delivery of 550,000 additional households to 2040”.*

National Policy Objective 33: - *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location”.*

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

National Policy Objective 64: - *“Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of public transport to the private car, the promotion of energy efficient buildings and homes, heating systems and zero local emissions, green infrastructure planning and innovative design solutions”.*

Further guidance regarding the assessment of building heights relative to location is available under the *Urban Development and Building Heights – Guidelines for Planning Authorities (Draft August 2018)*. This document, together, with the NPF clearly confirms that future population growth must be accommodated through the more efficient use of urban lands, including the delivery of a greater number of apartment units. The subject site is centrally located within Tallaght village area, 1.2km away from Tallaght (15-20 minutes walking distance) and within a short walking distance of a number of high frequency Dublin bus routes that exist in the area. In addition, the subject site is located in proximity to the Square Tallaght where a number of shops and supporting services are available. A density of this nature (c. 170 units/ha) at this inner suburban/infill site is considered appropriate and fully in accordance with the above-referenced policy documents.

The site is well served by public transport connections, and as such, is well placed in terms of its suitability to accommodate this future population growth. The proposal seeks to deliver a 3-6 storey mixed use scheme on the site. In this regard, we note that the LAP is supportive of such building heights in these types of locations. It is further submitted that a building height of six storeys would not be inappropriate at this location, and will act as a feature on the corner of Greenhills Road and Main Street.

It is considered that the proposed development, which includes 26 no. high quality apartment units fully complies with the NPF recommendations regarding the efficient use of zoned lands and would serve to deliver much needed residential accommodation at a time of acute demand within the Greater Dublin

Area. As illustrated below, the proposed development can be accommodated on this site without giving rise to any adverse impacts on residential or visual amenity.

### 5.2.2 Urban Development and Building Heights – Guidelines For Planning Authorities (December 2018)

This Guidance document states that, in order to meet the objectives of the NPF, significant increases in building heights and overall building densities need to be not only facilitated but actively sought out and brought forward by the planning process, particularly at local authority and An Bord Pleanála level, with increasing building heights having a critical role to play in delivering more compact growth in urban areas.

The building height of the proposed development does not exceed the building height framework strategy outlined in the which has taken the *Building Height Guidelines* into consideration. We contend that the development would not give rise to a detrimental impact on its receiving environment or the nearby residential amenity, and therefore should be granted planning permission. For further discussion on the proposed building heights, we refer the Planning Authority to Section 6.3. of this Report.

### 5.2.3 Sustainable Urban Housing - Design Standards for New Apartments, 2018

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (‘the Guidelines’) acknowledge the new homes projections contained in the National Planning Framework and confirm *“a need for an absolute minimum of 275,000 new homes in Ireland’s cities up to 2040, with half of these located in already built-up areas. This will necessitate a significant and sustained increase in housing output and apartment type development in particular”* (our emphasis).

The Guidelines further identify that *“apartments need to become more and more the norm for urban housing solutions. This need will continue because of on-going population growth, particularly in Ireland’s cities, a long term move towards smaller average household size, an ageing and more diverse population, with greater mobility, and a higher proportion of households in the rented sector”*

In considering appropriate locations for apartment schemes, the Guidelines confirm that the scale and extent of apartment developments should increase in proximity to core urban centres and other relevant factors including public transport nodes, high capacity public transport services, employment centres and urban amenities including parks, shopping and other services. ‘Central and/or accessible urban locations’ are identified as being generally suitable for small to large scale and high density apartment developments and include sites within walking distance (up to 15 minutes or 1,000 -1,500m) of principal city centres or significant employment locations, and sites within reasonable walking distance (up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops.

While a specific density threshold is not specified for such sites, densities in excess of 45 dwellings per hectare net are recommended for *“intermediate urban locations”* and as such, a threshold in excess of this figure is inferred for the *“central and/or accessible urban locations”*.

Based the site area of c. 0.23 hectares the current proposal has an equivalent residential density of c. 113 units/ha. However, as the site forms parts of the Greenhills Court scheme, it is important to consider the development in the context of the overall site. There are 17 no. apartment units existing onsite (Greenhill’s Court). The application seeks the demolition of 3 no. apartment units, replacing these with 11 no. new apartment units and 1 no. retail unit (Block A). Separately, Block B comprises 15 no. new apartment units. Therefore, with the addition of the 26 no. units proposed (40 no. units in total) the residential density will



be the equivalent to c. 173 units/ha, which is entirely appropriate on the subject site having regard to its highly accessible location. As such, it is submitted that the proposed development represents a highly efficient use of zoned urban land, and as such, would be in accordance with the proper planning and sustainable development of this site.

Compliance with the relevant Development Management Standards

The development complies with the 'Sustainable Urban Housing - Design Standards for New Apartments 2018', which includes standards in relation to:

- Apartment mix;
- Internal space standards;
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartment to stair/lift ratios;
- Storage spaces;
- Amenity spaces including balconies and patios;
- Car parking; and
- Room dimensions.

Section 2.23 of the Guidelines note that publication of NPF has signalled a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance based standards to ensure well-designed high quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in Development Plans, should be replaced by performance criteria, appropriate to location.

The proposed development (26 no. apartment units) is required to comply with the standards set out in the *Apartment Guidelines*. We note, however, that the proposed scheme exceeds these standards in many circumstances, thus, creating a high-quality development scheme.

We submit the following in this regard:

- 1) The proposed apartments provide for a **variety of household types and sizes** (5 No. studio units (19%, 6 No. one-bedroom units (23%), 7 No. two-bedroom units (27%) and 8 no. three-bedroom units (31%));
- 2) All apartment units **exceed the minimum floor space requirements** for each type of unit (total floor area, bedroom floor area and living space floor area);
- 3) The proposal includes 19 no. dual-aspect (c. 17%) and 7 no. single aspect (c. 26%) west and east facing units. There are no single aspect north facing units proposed;
- 4) The **private open space floorspace areas and minimum dimension requirements** comply with required standards;
- 5) The **communal open space area** requirement is in excess of the required standard (248 sq m is required, whilst 428 sq m is provided to serve 40 no. units);

6) The **communal open space is highly useable, of high quality** and caters to all ages. Both communal areas are well-overlooked, and, therefore, would benefit from good passive surveillance from the proposed nearby apartments; and

7) Apartments are designed to be **fully accessible for people with disabilities** and are fully compliant with Part M of the Building Regulations.

We can confirm the 26 no. apartment units all apartments types are designed to be in compliance with Apartments Guidelines.

With respect to parking, 15 no. car parking spaces will be provided, 1 no. of which is fully accessible. Given the high-quality public transport infrastructure available in the local area, the subject site represents the ideal location within the County for a scheme with reduced car parking provision.

Dedicated secure cycle parking for some 74 no. spaces is provided for the scheme to be located within a secure and covered bicycle storage rooms at basement level. The Guidelines provide a ratio of 1 no. bike space per bedroom and 1 no. visitor space for every two units which would lead to a requirement of c. 92 no. spaces. It is considered that the proposed 94 no. spaces will meet the requirements and will allow for 20 no. short stay spaces, which is considered sufficient given the site's strategic location in close proximity to a number of high frequency public transport nodes.

It is submitted that the proposed apartment units would provide a high standard of accommodation and residential amenity for existing and future occupants and would represent a high quality design response on this strategic site.

**5.2.4 Urban Design Manual – A Best Practice Guide**

The *Design Guide* presents 12 No. criteria that should be used to facilitate assessment of planning applications (and pre-planning consultations, appeals etc.) and should, therefore, be used as a guide to steer best design practice for residential proposals. The subject scheme has been designed, and is now assessed, in the context of these criteria (see enclosed Architectural Design Statement, prepared by TOT Architects).

**5.2.5 Design Manual for Urban Roads and Streets (DMURS) (2013)**

A key objective of the Design Manual for Urban Roads and Streets (hereinafter DMURS) is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity, whilst also facilitating efficient and secure internal movement with provision for future linkages. The DMURS Statement of Consistency prepared by PUNCH Consulting Engineers (enclosed in Appendix I of the Transport Assessment Report) provides further detail in respect of the compliance of the proposed development with DMURS.



5.2.6 Part V of The Planning and Development Act 2000: Guidelines (2017)

This Guidance document advocates consideration of Part V issues at the earliest point possible. In this regard, the issue of compliance with Part V requirements was discussed with the Local Authority at a preliminary stage which proposed the onsite provision of 2 no. dwelling units. A letter confirming the acceptability in principle of this proposal was provided by South Dublin County Council Housing Department dated 26<sup>th</sup> April 2021. This letter includes full details of the Part V provision and is enclosed with this planning application.

5.3 Regional Planning Considerations

5.3.1 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy, June 2019 (Reses)

The Regional Spatial & Economic Strategy (hereinafter RSES) 2019 – 2031, was published by the Eastern and Midland Regional Assembly and covers nine counties including twelve Local Authorities. The purpose of the Strategy is to support the implementation of Project Ireland 2040 through providing a long-term strategic planning and economic framework for the development of the Regions. A Metropolitan Area Strategic Plan (MASP) is provided in order to deliver compact regeneration and growth in the Dublin metropolitan area.

The MASP provides 5 no. strategic corridors which includes the M50 Ring (Multi-Modal) within which the subject site is located. The objective for this corridor includes the development of industrial and underutilised lands in the city centre in order to create new sustainable communities and to support the continued growth of Dublin as the primary business and retail core in the short to medium term. The MASP further supports the consolidation of Dublin City and Suburbs with a target population of 1.4 million people in the area by 2031. The suitability of the subject site in terms of providing an ideally located new residential scheme is demonstrated by Regional Policy Objective 4.3 which states:

*“RPO 4.3: Support the consolidation and reintensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects”*

This Objective complies with the NPF principle of compact and sustainable growth with a target of 50% of all new homes to be built on land within or contiguous to the existing built-up area in Dublin. The proposed development will contribute to achieving this target.

The proposed development will provide a high quality, primarily residential, mixed use scheme located on an infill site within the built-up area of Tallaght Village. The subject site is located c.1.2km (c.14 min walk) from the Tallaght Luas stop. It will also be located adjacent to Corridor 9 (Greenhills to City Centre) of the new BusConnects proposal. There are several bus stops located directly adjacent to the subject site on Greenhills Road serving bus route No. 27 and others on Main Street (Route Nos. 54A and 65). The Square Tallaght Shopping Centre, located c. 800m west, provides bus routes for (27,54a,65,75,76,76a,77-N, and 77a) with service every 20 minutes on weekdays (every 15 minutes at peak times).

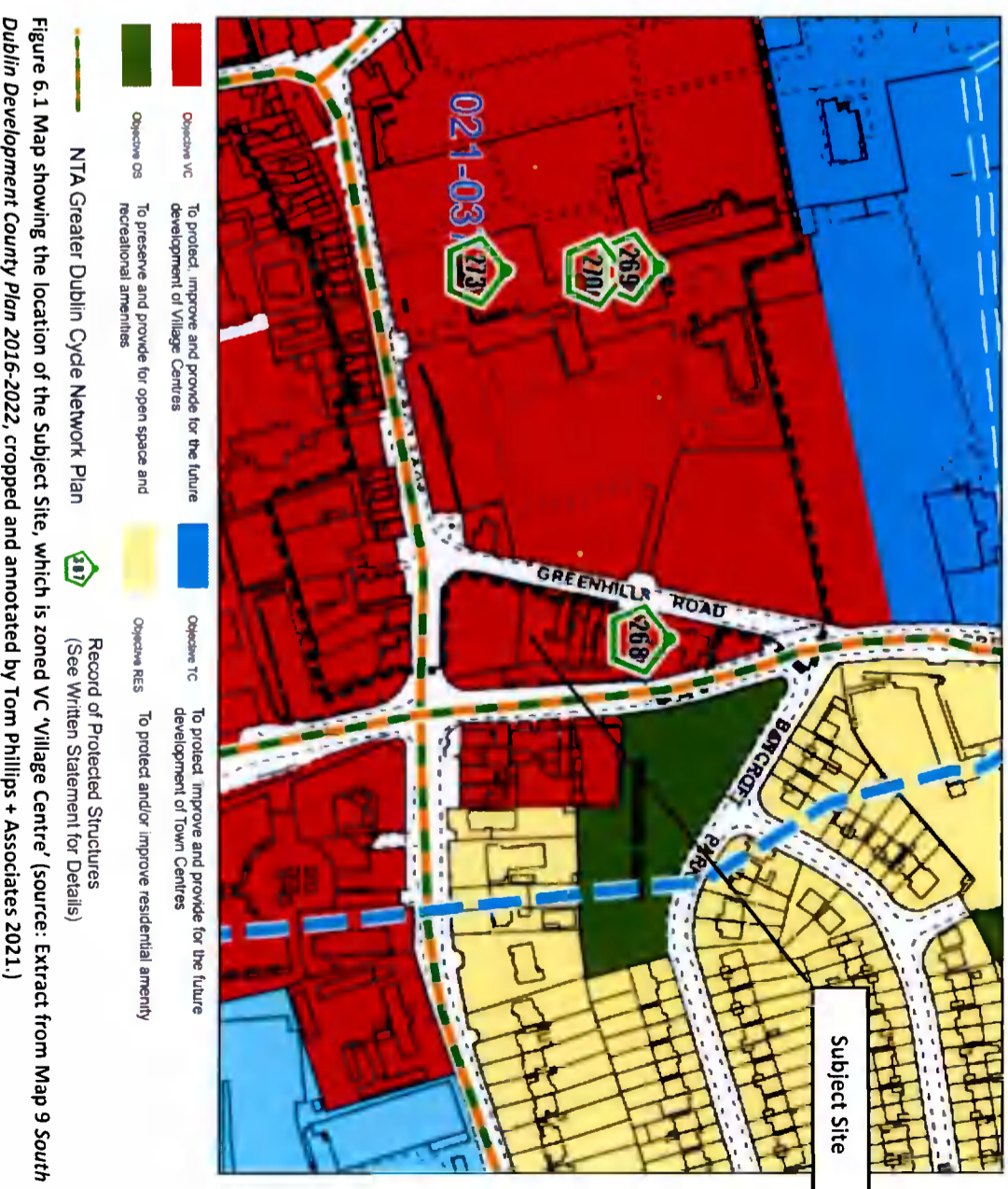
6.0 LOCAL PLANNING POLICY AND CONTEXT

6.1 Overview

This Section examines the planning and development context of the lands and outlines the key planning objectives and policies which apply to the site and the proposed development scheme, with specific reference to the *South Dublin County Development Plan 2016 -2022* ('Development Plan') which is the statutory plan for the area and also the *Tallaght Town Centre Local Area Plan 2020* ('LAP').

6.2 Zoning

The site is classified as an urban infill site and is subject to the land use zoning objective VC ('Village Centre') as per the *Development Plan*, having an objective 'to protect, improve and provide for the future development of Village Centres.' 'Residential' and 'restaurant/café' are permissible uses in this zone, which means the proposal is acceptable in principle, subject to normal planning considerations, policies and objectives.





Section 5.1.2 of the Development Plan states the following in relation to Land Use Objective 'VC':

*"The Village Centre zoning will support the protection and conservation of the special character of the traditional villages and provide for enhanced retail and retail services, tourism, residential, commercial, cultural and other uses that are appropriate to the village context."*

Section 1.7.2 of the Development Plan designates Tallaght as a Metropolitan Consolidation Town, stating:

*"Tallaght is the County Town and the administrative capital of South Dublin County. It is also designated as a Level 2 Retail Centre in the Retail Strategy for the Greater Dublin Area 2008-2016. Situated 12 kilometres from Dublin City, it is located on the N7 economic corridor, which is a key national transport corridor and also has a direct Luas connection and bus links to Dublin City. Tallaght is a significant settlement in regional terms and includes major shopping facilities, civic offices and associated commercial, financial, cultural and community facilities, the Institute of Technology, a Regional Hospital and employment areas"*.

The Development Plan supports the sustainable long-term growth of Metropolitan Consolidation Town through consolidation and urban expansion. In this regard, the following objectives are applicable to the application:

CS2 Objective 5: *'To promote and support high quality infill development in existing built-up areas'.*

CS2 Objective 6: *'To promote higher residential densities at appropriate locations, adjacent to town centres or high capacity public transport nodes (Luas/Rail).'*

The proposed development will deliver a high quality infill development on a fully serviced site within an existing built-up area, and will therefore comply in full with the above Development Plan objectives which support higher densities in close proximity to public transport.

### 6.3 Tallaght Town Centre Local Area Plan (LAP)

In relation to Local Area Plans, Section 1.9.0 of the Development Plan includes the following Objective:

Policy CS6 Objective 2: *To support a plan led approach in Local Area Plan areas by ensuring that development complies with the specific local requirements of the Local Area Plan, in addition to the policies and objectives contained in this Development Plan.*

As stated previously, Tallaght Town Centre Local Area Plan 2020 is the relevant pollical area plan which applies to the site. The LAP was adopted by South Dublin County Council in July 2020 and sets out an analysis of the Tallaght Village and provides specific guidance in order to deliver high quality housing and well-connected neighbourhood areas. The Plan applies to lands an overall area of c.380 hectares (c.939 acres) where it is expected to be able to accommodate 8,410 to 11,090 new homes; 7,800 to 15,300 additional jobs; and a population of up to 34,000 people, over a number of plan periods.

The vision of the LAP is to create *"an inclusive and vibrant Town Centre, a connected and accessible place with an attractive built environment for families of all kinds, workers, visitors and tourists. A place where people can live, work, visit and have fun in lively and liveable spaces."* Chapter 2, (Urban Framework), outlines the overall strategy for the built form that will shape the future spatial development of Tallaght Town Centre. The overall strategy is formulated using sustainable place making model and best practice urban design principles.

It is submitted that the proposed development is fully consistent with the objectives outlined in the LAP and does not materially contravene any of the LAP policies.

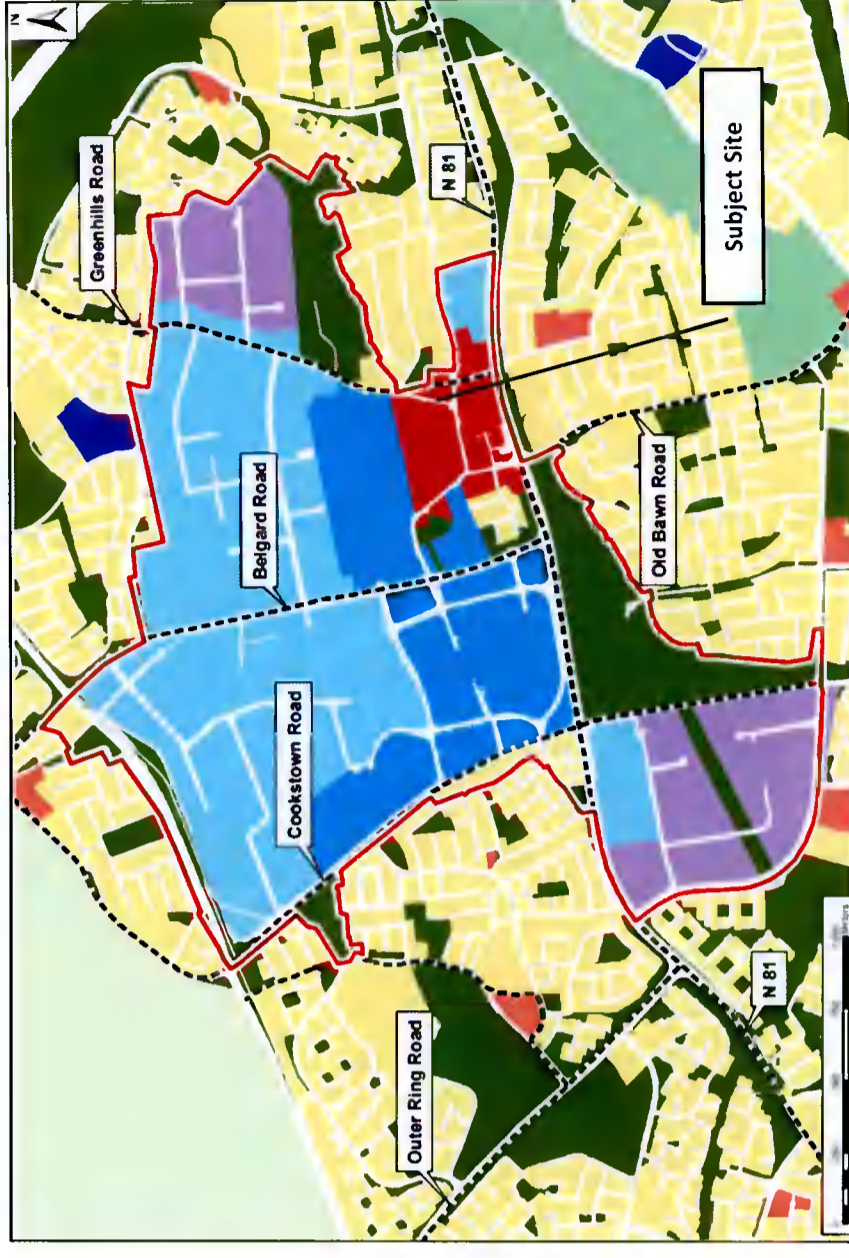


Figure 6.2: Map showing the location of the subject site within the Tallaght Town Centre LAP (Source: Tallaght LAP, cropped and annotated by Tom Phillips + Associates 2021.)

#### 6.3.1 'The Village' Framework

Chapter 3 sets out a framework for each neighbourhood with the subject site being located within 'The Village'. Section 3.4 (The Village) set out the development parameters for 'The Village'.

The objective for 'The Village' is:

*"Consolidate existing retail, town centre and mixed use residential neighbourhood within a high quality place of intimate scale respecting the historic character of the place."*

The land use mix/urban function envisaged for 'The Village' are in accordance with the Development Plan zoning objective for 'VC - Village Centre' and include residential, appropriate retail, walk to services, cultural, civic, recreational, community and other uses which support the evening economy. The LAP



states that, in general land use mix will be determined having regard to land use zoning, urban function and the overall urban framework for the neighbourhood.

Section 3.4 of the LAP includes a number of Key Objectives for The Village, the following of which are relevant to this planning application:

- VL1: Consolidate mixed use residential uses.
- VL6: Protect and enhance setting of protected structures and qualities of the ACA
- VL8: Protect the character and integrity of the Priority, including its parkland setting, and provide for greater public access and usage.
- VL9: Protect and preserve Heronry located on Priority lands and extending into TUD lands.
- VL10: Provide for some residential or mixed-use development on lands to the east of the Priority, subject to the above key objectives.

The proposed application is also cognisant of Objective VL7 which relates to the adjoining vacant site to the south:

*VL7: Given the prominent location of an existing vacant site located at the junction of Greenhills Road and Main Street, it is desirable that any future development of this site incorporates a high quality of public realm and should contribute to the public open space provision in the village or incorporate cultural or community functions.*

Section 3.9 of the LAP further outlines that, at a minimum the mixed-use frontages identified in the Urban Function concept (Figure 6.3 shown below) are required to have a mixed-use element and have a non-residential frontage at ground floor level, or some other active use at ground floor level. However, it is further stated that some residential elements will be considered in Greenhills along mixed-use frontages identified in the urban framework, subject to integrating effectively with existing uses. As such, the proposed development includes an active street frontage use in the form of a café (c. 93 sq m) at the corner of Main Street and Greenhills Road providing an active street frontage to Main Street. It is envisaged that the adjoining site to the south will provide for the bulk of active uses along the extent of Main Street and Old Greenhills Road in accordance with Objective VL7 of the Urban Framework Strategy.



Figure 6.3 Extract from Figure 3.9 of the LAP showing locations of mixed-use frontages within The Village. Red star \* shows the location of the proposed development (Source: Tallaght LAP, cropped and annotated by Tom Phillips + Associates 2021.)

The LAP sets out certain design parameters for development at this location having regard to the development management criteria set out in the *Urban Development and Building Height Guidelines*, which provide clear criteria to be applied when assessing applications for increased height. The LAP recommends building heights of 4-6 storeys (residential) or 3-5 storeys (commercial) for development fronting onto Main Street and Old Greenhills Road in response to the local context, and in particular the ACA. The proposed development fully accords with the building height strategy as set out in Figure 3.10 of the LAP. Proposed Block A will be 6 storeys in height and comprise 1 no. café unit at ground floor level with residential apartment units above. Separately, proposed Block B will be 3 to 5 storeys in height. The 3 storey element is located adjacent to the existing cottages fronting Old Greenhills Road to avoid any overbearing and overshadowing impacts. The proposed development would be a sustainable use of zoned serviced lands and each building has been designed to ensure minimal impacts to adjacent permitted developments.

Additionally, the application is accompanied by assessments which confirm compliance with established sunlight, daylight, overlooking and other residential amenity minimum design standards. The enclosed Landscape and Visual Impact Assessment, prepared by Philip J Landscape Architecture, and the photomontages, prepared by Redline Studios, clearly illustrate the transition in heights between the proposed development and the permitted development within the surrounding context and the immediately adjoining the site (Greenhills Court). The proposed development will not be visually dominant when viewed from the surrounding area.





Figure 6.4 Extract from Figure 3.10 of the LAP showing the overall urban structure and building heights within The Village. Red star \* shows the location of the proposed development (Source: Tallaght LAP, cropped and annotated by Tom Phillips + Associates 2021.)

The proposed plot ratio will be 1.63, which would be above the indicative plot ratio of 0.75:1-1:0 which applies to 'The Village'. Flexibility in relation to the gross floor area (GFA) of up to 20% of the plot ratio ranges may generally be applicable where there is a strong design rationale for an increase in density / height and the development will result in a significant public gain. As such, a plot ratio of up to 1.95 may be considered based on the following calculation:

$$\begin{aligned} \text{GFA of the proposed development (excl. basement)} &= \text{c. } 3,820 \text{ sqm.} \\ 20\% \text{ of } 3,820 \text{ sqm} &= 764 \text{ sqm} \\ 3,820 \text{ sqm} + 764 \text{ sqm} &= 4584 \text{ sqm} \\ 4584 \text{ sqm} / 2,342 \text{ sqm (site area)} &= 1.95 \text{ (maximum permitted plot ratio).} \end{aligned}$$

The LAP further outlines that flexibility to plot ratio range may also be considered where a site is located directly adjacent to a high frequency bus stop (i.e. 10-minute peak hour frequency) on a dedicated bus lane). In relation to the above, the proposed scheme has been designed to create a strong sense of place which is reflected in its geometry, material usage, historical context, and connection to its surrounding

landscape. Proposed Block A will be architecturally interesting, acting as a focal point on the corner of Main Street and Greenhills Road with an active frontage at ground floor (café) and balconies at upper floor level.

We refer the Planning Authority to the enclosed Design Statement, prepared by TOT Architects, which provides a detailed design rationale for the proposed development. Additionally, the subject site is located directly adjacent Dublin Bus Route No. 27, which is considered to be a high frequency bus route. The proposed of 1.63 plot ratio is therefore acceptable on this infill site given its strategic location.

#### 6.4 Compliance with Policies and Objectives Within The LAP

Any new developments must comply with the policies and objectives within the LAP which relate specifically to the LAP area, and also all relevant objectives and standards in the *Development Plan* and national policies and guidelines. The following LAP policies and objectives are most relevant to the application:

##### 6.4.1 Retail Objectives

Section 4.4 (Retail) of the LAP states that plan supports the provision of ground floor retail uses which will provide for active and vibrant frontages, increased footfall and provide the potential for a complimentary mix of uses to emerge in the area. The Urban Function of The Village is to provide a mix of uses in accordance with the 'VC' zoning objective, including residential and retail which support the evening economy.

The proposed development includes a cafe unit (c. 93 sq m) at the main frontage to Greenhills Road and Main Street, along a busy pedestrian thoroughfare. The café will provide an active ground floor use and passive surveillance by above ground floor residential units.

##### 6.4.2 Residential Objectives

Section 5.2 (Residential Development) of the LAP includes a number of objectives in relation to high quality design, housing mix and housing options. In accordance with Objectives RE 1 – RE 4, the proposed development will include deliver a mixed and balanced community that is of a high-quality design. We submit that 30% of the 26 no. residential units proposed will be three bedroom units, in accordance with Objective RE 2. The scheme includes an appropriate mix of tenure and dwelling types provided to meet the needs of the current and future population of Tallaght.

##### 6.4.4 Dwelling Size, Internal Layout and Amenity Space

As required by Section 5.2.3 of the LAP, all apartments will accord with or exceed the open space and floor area standards set out in *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018)*. The design of schemes fully accords with the minimum standards outlined in the *Apartment Guidelines* in relation to design, internal facilities, aspect, lift/stair cores, communal facilities, refuse storage, bicycle parking and children's play and amenity spaces.

The communal open spaces have been designed, orientated and sited in accordance with the *Apartments Guidelines* will provide outdoor recreation opportunities for residents. The private open spaces, and communal open spaces is at a size that will cater to the needs of future residents. Each space will be



afforded to good levels of solar access throughout the day, as demonstrated in the enclosed Sunlight, Daylight and Overshadowing Assessment, prepared by METEC Consulting Engineers. The provision of an active play area (c. 81 sq m) will ensure that smaller children are fully catered to. For adults, an outdoor gym and 'work from home' area is also proposed.

#### 6.4.7 Public Open Space

useable, easily accessible, secure and will fully cater to the needs of families with young children and for less mobile older people.

Private amenity space is provided in the form of balconies and terraces. All private amenity spaces shall be of adequate proportions and are fully useable. The balconies in particular have a minimum depth of 1.5 metres, in one useable length, throughout the development. Two proposed apartment units will have private open space located at ground floor level which have been afforded appropriate screening in the form of raised buffer planting to ensure adequate privacy and security.

Section 2.7.2 of the LAP that a minimum of 10% of the gross site area shall be dedicated for use as public open space within any proposal for development which shall be of a high quality and integrated into an overall interconnected network of public open space and green routes.

We refer the Planning Authority to the enclosed Landscape Plan and accompanying detailed section plans, prepared by Murphy + Sheanon Landscape Architects, showing full details on private and communal amenity spaces. Additionally, all outdoor amenity spaces will be afforded good levels of solar access throughout the day, as demonstrated in the enclosed Sunlight, Daylight and Overshadowing Report, prepared by METEC.

Accessible public open space (10.5% of the total site area) is provided within the development at northern area of the site (and contains a children's playground) and adjacent to the café units at the corner of Main Street and Greenhills Road. The public open space provision will contribute to the village and is fully accessible. Additionally, the site layout ensures the successful interaction between the residential scheme, streets and public to encourage interaction between residents and the public.

#### 6.4.5 Architectural Conservation and Archaeological Heritage

Section 6.0 (Objectives HC 1 – HC 3) of the LAP recognises the importance of conserving Tallaght's rich heritage and aims to ensure that new development respects the historic grain and built environment that currently exists. The subject site is located within the recorded archaeological site of 'Tallaght' town (Ref. DU-021-037) as outlined in the 'Record of Monuments and Places for Dublin' published by Duchas, 1998 and adjacent to the Tallaght Architectural Conservation Area (ACA). There are also number of Protected Structures within the vicinity, including St. Basil's Training Centre (Ref 268), located directly north of the site, and The Priory (Ref. 269), St. Mary's Dominican Priory (Ref. 270) and St. Mary's Dominican Church (Ref. 273) to the west.

#### 6.4.8 Open Space and Green Infrastructure

It is also envisaged that future development of the adjoining site to the south will unlock the full potential of the public open space and additional access points will be capable from Main Street. The high-quality design of the overall scheme includes good pedestrian and cycle connections with existing and future environs as demonstrated in the enclosed Landscape Plan and Landscape Design Report, prepared by Murphy + Sheanon Landscape Architects

The application does not propose any building or works to existing protected buildings, structures or sites contained in the Record of Protected Structures in Tallaght. The proposed development has been carefully designed to ensure that the special character and/or appearance of a nearby Protected Structure (including its historic curtilage) will not be detrimentally affected. The overall design (height, bulk and massing) and the chosen materials and palettes aim to enhance, rather than diminish, the historic character and visual setting of the proposal adjacent Tallaght Architectural Conservation Area.

We refer the Planning Authority to the enclosed the Archaeological Impact Assessment, prepared by AHC Ltd and the Architectural Heritage Impact Assessment, prepared by ARC, which provides reassurance that the proposed development will not negatively impact upon the special character of the surrounding area.

#### 6.4.6 Communal and Public Open Space

Communal amenity space for existing and future residents is with a central courtyard provided (428 sq m in total), located between Block B and the existing Greenhills Court complex residential, contains an outdoor gym and 'work from home' space and is accessible to all residents. The heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year as demonstrated in the accompanying Daylight, Sunlight and Shadow Assessment, prepared by Metec Consulting Engineers. The communal open space area is offered high levels of passive surveillance, is

#### 6.4.9 Zone of Notification

The subject site is located within a 'Zone of Notification' (shown in Figure 6.5 below in a light pink-coloured wash). The zone does not define the exact extent of a monuments but rather identifies them for the purposes of notification under Section 12 of the National Monuments Act (1930-2004). In this instance, the red dot indicates a small tower house, which was demolished in 1852, located on the former entrance to the village of Tallaght (DU022-018001).

In accordance with Section 6.3 (Archaeological Heritage) of the LAP, the application is accompanied by an Archaeological Assessment Report prepared by AHC Ltd, which fully assesses any potential archaeological



implications of the proposed development. The finding of this report is summaries in Section 7.0 of this Report.

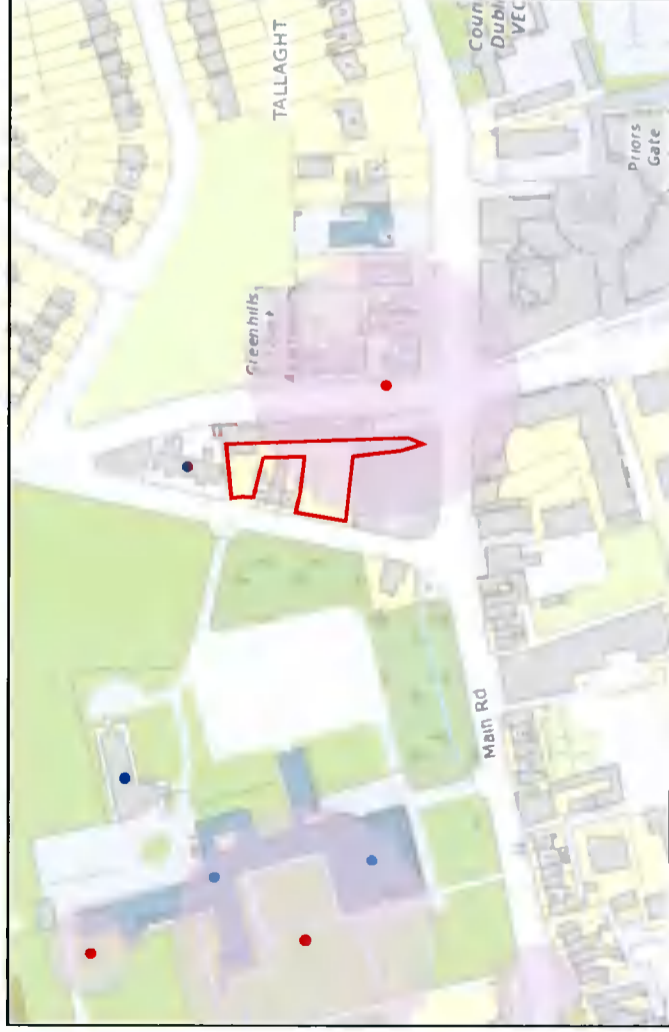


Figure 6.5 Map showing the location of a tower house DU022-018001 and the Zone of Notification for this monument which encompasses the subject site (source: <https://maps.archaeology.ie/historicenvironment/>), cropped and annotated by Tom Phillips + Associates 2021.)

## 6.5 Compliance the South Dublin County Development Plan 2016-2022

The *Development Plan* sets out the policies and objectives for new housing within Chapter 2. It is respectfully submitted that the proposed development is consistent with the requirements of the *Development Plan* with regard to the following:

### 6.5.1 Policy H8 Residential Density

There is no upper limitation standard for residential density that applies to the site. We note that the Policy H8 of the *Development Plan* states that 'It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.'

Section 2.6 of the LAP states that higher and medium intensity areas should be located primarily around the existing retail and administration centre which is classified as The Centre and Luas Stations on the Cookstown and Belgard Roads. The subject site is not located within any of these locations, however, we highlight that the LAP has been prepared in respect of and is consistent with the *Apartment Guidelines*.

In line with the provisions of the *Apartment Guidelines*, the subject site is considered to be located within a 'Central and/or Accessible Urban Location' which is defined as follows:

*'Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:*

- Sites within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;
- Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services'.

*Apartment Guidelines*, 2018, p. 5

The residential density equates to c.173 units per hectare which takes into account the existing residential units on site (i.e. 40 no. units on a c. 0.23 hectare site) and is entirely appropriate on the subject site having regard to its highly accessible location. For instance, the application site is located in close proximity to Technological University Dublin and a number of major employment, educational, community and retail facilities in Tallaght, including The Square Tallaght Shopping Centre. There are a number of high frequency bus routes within walking distance of the subject site on Greenhills Road and on Main Street. Therefore, the site falls within a 'Central and/or Accessible Urban Location', which is considered suitable for small to large scale and higher density development schemes.

### 6.5.2 Policy H9 Residential Building Heights

In relation to residential building heights, the *Development Plan* provides the following:

H9 Objective 4: "To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use Zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme."

In this instance the 'relevant approved Local Area Plan' is the Tallaght Town Centre Local Area Plan 2020. The tallest building within the proposed development will be six storeys in height in accordance with the Urban Function concept of The Village as shown in Figure 6.4 of this Report (Extract from Figure 3.10 of the LAP).

### 6.5.3 Policy H10 Mix of Dwelling Types

The proposed scheme includes a range of studio, one, two and three-bedroom units. For purposes of clarity, the overall dwelling mix for the scheme (existing and proposed) is outlined in the table below and shows that the mix of unit types will provide for a balanced range of dwelling types and sizes to support a variety of household types in accordance with Section 11.3.1 of the *Development Plan*.

Unit types	Proposed Unit Mix	Overall Unit Mix
Studio units	5 (19%)	5 (12.5%)
1-bedroom	6 (23%)	11 (27.5%)
2-bedroom	7 (27%)	16 (40%)
3-bedroom	8 (31%)	8 (20%)
<b>Total:</b>	<b>26</b>	<b>40</b>



Additionally, in accordance with Objective RE 2 of the LAP, the application includes a minimum of 30% of the units as three bedroom units. Section 11.3.1 (i) of the *Development Plan* states that 'the overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types.' Although a mix of unit types in terms of houses and apartments is not proposed within the scheme, it is considered that this is appropriate due to the significant quantum of traditional housing stock within the Tallaght and Greenhills areas and the need to accommodate higher densities in line with strategic planning policy. The proposed scheme will provide for a mix of apartment typologies and thus contribute to the overall residential mix within the wider area and facilitate a range of household sizes.

#### 6.5.4 Policy H11 Residential Design and Layout

The proposed site layout and scheme design has been developed in compliance with the standards provided for in Chapter 11 of the *Development Plan*. We refer the Planning Authority to the enclosed Architectural Design Statement prepared by TOT Architects which provides further detail in this regard.

#### 6.5.5 Policy H7 Objectives Urban Design in Residential Developments

The proposed scheme has been designed in compliance with the provisions of the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009*, the *Urban Design Manual 2009* and the *Design Manual for Urban Roads and Streets (DMURS)* in accordance with the *Development Plan* objectives.

The proposed development comprises a high-quality design for both residential and commercial elements and includes a number of public realm improvements particularly along the main pedestrian thoroughfares of Main Street and Greenhills Road. Details of design compliance are contained within the Architectural Design Statement, prepared by TOT Architects. The roads layout together with pedestrian and cycle facilities for the site have been developed considering the design principles set out in DMURS, as outlined in the enclosed Traffic and Transport Assessment, prepared by Punch Consulting Engineers.

#### 6.5.6 Public Open Space and Children's Play

Section 11.3.1 (iii) of the *Development Plan* confirms that a minimum of 10% of the total site area should be reserved for public open space. Based on the size of the site, this would equate to a requirement for c. 234 sqm. The total quantum of open space proposed is 247 sqm and thus significantly exceeds the minimum requirement. The public open space provision also includes a safe and secure outdoor children's play area (83 sqm) for young families. A detailed Landscape Plan, Play Strategy Plan and Open Space Analysis has been prepared by Murphy + Sheanon Landscape Architects and is enclosed with this application.

#### 6.5.7 Policy H13 Private Open Space

In accordance with Objectives H13 (1 and 2) and Table 11.21 of the *Development Plan*, all private open spaces serving the apartments (balconies and terraces) will comply with national qualitative and quantitative standards, with the exception of studio unit Type A1 (3.8 sqm) in Block A. The private terrace to this unit is located at ground floor level adjacent to the lobby entrance and therefore its size is slightly restricted and falls just short of the 4 sqm minimum for private amenity space. All other private amenity spaces will be greater than 4.4 sqm, be fully useable, with good solar access and privacy, and be fully

compliant with the minimum private amenity space requirements set out under the *Apartments Guidelines*.

#### 6.5.8 Policy H15 Privacy and Security

Section 11.3.1 (v) of the *Development Plan* outlines that a separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Distances less than 22 metres will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy.

The proposed development is fully compliant with the 22m separation distance standard as illustrated in the architectural drawings, prepared by TOT Architects, which accompany the application. Adequate separation distances are provided between each block with privacy strips located to the front of the ground floor apartments providing additional screening for privacy. We refer the Planning Authority to enclosed Landscape Design Report, prepared by Murphy + Sheanon Landscape Architects which shows full details plant screening.

#### 6.5.9 Car Parking Standards

Tables 11.23 and 11.24 of the *Development Plan* sets out the maximum permissible parking rates divided into 2 no categories (Zone 1 and Zone 2). The proposed development is located within 400m of a high-quality bus service therefore will come within Zone 2 where more restrictive car parking rates apply. The table below outlines the maximum permissible parking car parking rates which will apply to the proposed development:

Unit Types	No. of Units Proposed	Total Units	Zone 2 SDCC Standard	Maximum permissible parking
1-bedroom	11	16	0.75 space	12
2-bedroom	7	16	1 space	16
3-bedroom	8	8	1.25	10
Café	1	1	1 space per 20 sqm GFA	4
<b>Total</b>	<b>26</b>	<b>40</b>		<b>42</b>

The proposed quantum of car parking spaces has been determined with regard to pre-planning guidance from the Roads Department, the *Development Plan* and National policy guidance. The *Development Plan* permits a maximum of 42 no. car parking spaces to accommodate the proposed development's parking needs. However, a reduced car parking provision of 15 no. car parking spaces is proposed which includes 2 no. 'Go Car' spaces.

This quantum is considered appropriate given:

- The *Development Plan* standards are maximum standards;
- Recent national policy with the *Apartment Guidelines* seeks to minimise car parking in highly accessible areas which is applicable to the subject site given the proximate Quality Bus Corridor; and
- Provision of cycle parking spaces is significantly above the *Development Plan* minimum requirements, and is in accordance with the Apartment guidelines



A comprehensive overview of the proposed car parking provision is provided in the accompanying Traffic and Transport Assessment provided and Mobility Management Plan by PUNCH Consulting Engineers which was prepared in consultation with SDCC Roads Department.

#### 6.5.10 Cycle Parking Standards

Tables 11.22 of the *Development Plan* sets out the minimum bicycle parking rates for all new developments:

- 1 no. long term cycle parking per 5 no. apartment units
- 1 no. short term cycle parking per 10 no. apartment units
- 1 no. long term cycle parking per 5 no. staff
- 1 no. short term cycle parking per 10 no. seats

The above standards indicate a requirement for c.15 no. cycle parking spaces in the case of the proposed development. However, the *Apartment Guidelines* have set “a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.”

The above standards indicate a requirement for 93 no. cycle parking spaces in the case of the proposed and existing residents’ units (40 no. in total) and a further 3 no. cycles spaces for the proposed café units which have been provided across the proposed development in sheltered, accessible locations.

#### 6.5 Conclusion – Proposal Is Compliant with the Development Plan

The proposal which comprises the demolition of the 3 no. existing residential units on site and the construction of a mixed-use development, featuring 26 no. apartments and 1 no. café units on lands west of Greenhills Road and north of Main Street, and to the east of Old Greenhills Road, Tallaght, Dublin 24. It has been fully demonstrated that proposed development is consistent with the policies and provisions of the *South Dublin County Development Plan 2016-2022* and the *Tallaght Town Centre Local Area Plan 2020-2026*, which are the key planning policy documents at a local level.

## 7.0 STUDIES AND SUPPORTING INFORMATION

### 7.1 Architectural Design Rationale

The Architectural Design Statement Report was prepared by TOT Architects in order to summarise the architectural design concept and the planning development context for the proposed development scheme. It describes the subject site and existing buildings, and provides a rationale for the development proposal, massing, materials and other key aspects of the proposed design.

### 7.2 Access, Transport and Parking

We refer to the enclosed Traffic and Transport Assessment Report and Mobility Management Plan, prepared by PUNCH Consulting Engineers, which describes the overall transport strategy underlying the subject development.

Vehicle access will be via Old Greenhills Road to the west of the site via a new access point to the basement level car park. The proposed development includes 15 no. car spaces (incl. 2 no. ‘Go Car’ spaces) and 94 no. bicycle parking spaces.

The enclosed assessments also demonstrates that the proposed development will have a negligible impact on the performance of the surrounding road network.

### 7.3 Engineering Services

We refer to the enclosed *Engineering Planning Report* and accompanying plans, prepared by PUNCH Consulting Engineers, which describes the overall engineering strategy underlying the subject development.

Foul Drainage Design: Section 4.3.3 of the enclosed Engineering Planning Report, and the accompanying Drawing No. 202253-PUNCH-XX-XX-DR-C-0100 for full details on the proposed foul water drainage arrangement.

Watermain Design: To the west of the proposed development lies an existing 100mm watermain. Due to its close proximity, PUNCH Consulting Engineers have consulted with Irish Water to determine if a diversion is required. Following consultation, Irish Water have advised that a diversion is not required to facilitate the basement construction. We refer the Planning Authority to Drawing No. 202253-PUNCH-XX-XX-DR-C-0301 for watermain dimensions and setback distances.

As outlined in Section 5.3 of the enclosed Engineering Planning Report, it is proposed to construct a 100mm diameter watermain to serve the proposed development. The proposed watermain will connect to the existing watermain on the Old Greenhills Road to the west of the site. We refer the Planning Authority to Drawing No. 202253-PUNCH-XX-XX-DR-C-0300 for proposed watermain layout.

Storm Water Drainage: A new surface water sewer network shall be provided for the proposed development which will be entirely separated from the foul water sewer network. All surface water runoff from roof areas and hardstanding areas are designed to be collected by a gravity pipe network. Existing drainage is proposed to be retained for the existing buildings within the redline boundary.



We refer the Planning Authority to the enclosed drawing, prepared by PUNCH Consulting Engineers, listed below for full details on proposed stormwater sewers:

- Drawing No. 202253-PUNCH-XX-XX-DR-C-0100: Proposed Ground Floor Drainage Layout
- Drawing No. 202253-PUNCH-XX-XX-DR-C-0101: Proposed Basement Drainage Layout
- Drawing No. 202253-PUNCH-XX-XX-DR-C-0102: Proposed Drainage Catchment Areas Layout
- Drawing No. 202253-PUNCH-XX-XX-DR-C-0150: Proposed SUDS Measures
- Drawing No. 202253-PUNCH-XX-XX-DR-C-0500: Attenuation Tank Details

SUDS: Section 3.3 of the enclosed Engineering Report outlines the SUDS measures proposed to decrease the impact of the development on the receiving environment. These include:

- Green Roof areas
- Petrol Interceptors within basement area
- Attenuation Tank
- Podium Landscaping
- On grade landscape areas
- Pervious Pavements

We refer the Planning Authority to enclosed Drawing No. 202253-PUNCH-XX-XX-DR-C-0150, prepared by PUNCH Consulting Engineers and Drawing No. 19118-PA-208 and Drawing No. 19118-PA-213, prepared by TOT Architects, for details of proposed SUDS measures.

Site Specific Flood Risk Assessment: The proposed development is located in a Flood Zone C for fluvial, pluvial and coastal flooding, and the uses proposed are appropriate. Flood levels for the area were obtained from existing CFRAMS mapping, and the maximum predicted level at the mode nearest the site is 86.43 mAOD for a 1:1000-year fluvial event. The site is not at risk of tidal flooding. The FFL's of the proposed development are minimum 90.72 mAOD at ground level and 88.035 mAOD in the proposed basement which are well above the nearest flood level. We refer the Planning Authority to the enclosed Site Specific Flood Risk Assessment for further details.

#### 7.4 Landscape Master Plan and Report

A site-specific Landscape Master Plan and Report has been prepared by Murphy Sheanon Landscape Architects. The Master Plan sets out a rationale for integration of landscaping proposals with the wider site plan proposals including children's play area, outdoor gym, seating areas, 'work from home' area, pedestrian walkways and wider planting schemes. Please see enclosed landscaping plans for further details.

#### 7.5 Daylight / Sunlight / Shadow Assessment

We refer to the enclosed Daylight, Sunlight and Shadow, prepared by Metec Consulting Engineers, which illustrates the effect that the proposed development could have on the light levels available to neighbouring properties and also considers the levels of daylight amenity which would be provided within the accommodation which is proposed as part of the application.

After carrying out a comprehensive daylight, sunlight and overshadowing assessment of the proposed development using simulation modelling and comparing results achieved against the BRE guidelines, the results presented within the enclosed report demonstrate that overall, the proposed development achieves the guidance given in BRE BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'.

#### 7.6 Architectural Heritage

Careful consideration has been given to the overall design and height given the location of the subject site adjacent to the sensitive area of Main Street and adjacent to the cultural/historic core. The scale and proportion of new buildings are varied in specific areas of the development to minimise any potential impacts upon neighbouring buildings. Each building will include high quality materials and include an appropriate selection of colours, textures and patterns which will be complement the location of the site in its historical setting. An Architectural Heritage Assessment, prepared by ARC Architectural Consultants Limited, is submitted with this planning application which concludes any potential impact there might be on architectural heritage in the area will be confined to impact on setting and there will be no physical impact on any structure of architectural heritage value.

#### 7.7 Archaeological Heritage

An Archaeological Assessment Report, prepared by AHC Ltd., is submitted with this planning application as the subject site is located within a zone of archaeological potential with Tallaght Village, the location of a medieval settlement. The assessment found that the site is highly likely that the construction of the original basement effectively removed any *in situ* archaeological deposits in the area of the proposed basement extension. This leaves the triangle of relatively untouched ground in the southeast corner of the site as the only area where possible archaeological deposits might survive *in situ*. The report concludes that the construction of the proposed Block A in the area along with its associated foundations and services would have a significantly negative impact on any surviving archaeological features or deposits.

#### 7.8 Landscape and Visual Impact Assessment (LVIA)

A Landscape and Visual Impact Assessment was carried out by Philip J Landscape Architecture in order to identify and determine any potential effects the proposed development would have on the surrounding landscape and visual amenity. The assessment found that the proposed development is not expected to have a significant effect on any visual amenities but is expected to have an effect on the Village Centre (a landscape/townscape receptor). This is due to the inclusion of a new feature in a prominent location within the Village Centre, but the visual assessment notes that several receptors are not affected. Further, the change is consistent with and a potential improvement upon the Village Centre's current vernacular. No mitigation steps are recommended beyond the public green space described in documents prepared by TOT Architects. Lastly, no significant effect is expected on other landscape receptors, including waterways in the assessment area.

#### 7.9 Public Lighting Plan

An Outdoor Lighting Plan, prepared by METEC Consulting Engineers, is submitted as part of this planning application and describes the overall lighting strategy underlying the subject development.



#### 7.10 Operational Waste Management Plan

All waste generated will be stored in bin storage areas located in a safe and secure location at ground floor level. Bins will be distinctly labelled and colour-coded so that minimal contamination occurs. Separate storage will be provided for general waste, recycling material (e.g. glass, plastic, cardboard, paper) and organic (food) waste.

The bins will be transferred from the bin storage area to designated collection point by the facilities management staff for collection by a private waste contractor at an agreed date and time. We refer the Planning Authority to the enclosed Operational Waste Management Plan, prepared by PUNCH Consulting Engineers, for further details.

#### 7.11 Outline Construction and Demolition Waste Management Plan

A Construction and Demolition Waste Management Plan has been prepared by PUNCH Consulting Engineers and is enclosed. It provides the information necessary to ensure that the management of construction and demolition waste at the site is undertaken in accordance with current legal and industry standards including the *Waste Management Act 1996 and associated Regulations, Litter Act 1997 and the Eastern-Midlands Region (EMR) Waste Management Plan 2015-2021*.

#### 7.12 Outline Construction Management Plan

An Outline Construction Management Plan, prepared by PUNCH Consulting Engineers, is enclosed. It outlines the general activities required for the construction of a proposed mixed-use development on the subject site.

#### 7.13 Building Life Cycle Report

A Building Lifecycle Report prepared by Metec Consulting Engineers is enclosed and provides an overview of the sustainable energy strategy for the proposed scheme. All apartments will be designed to have good levels thermal performance, comfort, daylight and sound insulation.

#### 7.14 Sustainability Statement/Energy Statement

The Energy Statement was prepared by METEC Consulting Engineers and is enclosed. The report also addresses how the proposed development will comply with Technical Guidance Document (TGD) Part L – Conservation of Fuel and Energy 2008 (Buildings other than Dwellings) 2017, which is the main influence on standards of energy performance and carbon dioxide emissions in Ireland.

It highlights how the construction and long-term management of the proposed development overseen and how overall energy considerations have been inherently addressed as part of this proposal.

#### 7.15 Ecological Impact Assessment

An Ecological Impact Assessment has been prepared by Openfield Ecological Services and this enclosed. The assessment found that there are no examples of habitats listed on Annex I of the Habitats Directive or records of rare or protected plants on site. Additionally, there were no species listed as alien invasive

as per SI 477 of 2011 or as 'most unwanted' by Invasive Species Ireland on site. There are no locally high value habitats and features are of limited value even for common and widespread species.

#### 7.16 Appropriate Assessment Screening (AA)

This Application was screened for Appropriate Assessment by Openfield Ecological Services. The report concludes that the proposed development is not located within or directly adjacent to any SAC or SPA but pathways do exist to a number of these areas. An assessment of the aspects of this project has shown that significant negative effects are not likely to occur to these areas either alone or in combination with other plans and projects.

#### 7.17 Compliance with Part V of The Planning and Development Act, 2000 (As Amended)

The Applicant have been engaged in discussions with the Housing Department of Dublin City Council regarding Part V obligations arising on foot of the proposed development. Please refer to the enclosed Part V documents for further information in this regard.



**8.0 DOCUMENTS SUBMITTED AS PART OF THIS APPLICATION**

**8.1 Mandatory and Discretionary Documents Which Constitute This Planning Application**

The *Planning and Development Regulations 2001* (as amended) ('the Regulations') specify the form and quantum of documents that must accompany a planning application and set out the number of copies required. These documents are listed below.

The following documentation is provided in support of this planning application:

**8.2 Planning Fee**

A cheque amounting to the sum of **€2,106.60** is enclosed in accordance with Schedule 9 of the *Planning and Development Regulations, as amended*.

Proposed Mixed-Use Scheme	CALCULATION	AMOUNT
<b>CLASS OF DEVELOPMENT</b>		
Class 1 Provision of a house	26 no. apartments x €65	<b>€1,690</b>
Class 4 The provision of buildings other than buildings coming within class 1, 2 or 3 €3.60 per square metre of gross floor space (641 sq m)	Cafe (93.5 sqm) x €3.60	<b>€336.60</b>
Class 13 Ancillary Development €80, or €10 for each 0.1 hectare of site area, whichever is the greater.	Site Area – 0.23 Ha. (at €10 per 0.1 Ha)	<b>€80.00</b>
<b>TOTAL</b>		<b>€2,106.60</b>

**8.3 Planning Application Form**

Completed South Dublin County Council Planning Application form, signed and dated 28<sup>th</sup> May 2021.

**8.4 Statutory Notices**

An original page of the *Newspaper Notice* dated 27<sup>th</sup> May 2021 in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, as amended*.

One copy of the Site Notice dated 27<sup>th</sup> May 2021 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations, as amended*.

**8.5 Drawings**

**Architectural Drawings**

In compliance with the *Planning and Development Regulation, as amended*, 6 No. sets of the requisite architectural plans, sections and elevations are provided by TOT Architects. Please refer to the enclosed drawing issue sheet from the Architect, with 6 no. copies enclosed.

**Engineering Drawings**

In compliance with the *Planning and Development Regulations as amended*, 6 No. sets of the requisite engineering plans and drawings are provided by PUNCH, Consulting Engineers.

**8.6 Part V Agreement Letter**

One copy of an Agreement Letter from South Dublin County Council (Housing Department) (dated 26<sup>th</sup> April 2021.), which confirms that an agreement, in principle, has been reached for the delivery of Part V housing units. This is included as an appendix to the planning application form.

**8.7 Other Supporting Reports**

Six copies of the following reports:

ITEM	PREPARED / PROVIDED BY:
Planning Report	Tom Phillips + Associates
Full set of architectural plans and drawings	TOT Architects
Design Rationale Report	TOT Architects
Architectural Heritage Impact Assessment	ARC Architectural Consultants Ltd.
Landscape and Visual Impact Assessment	Philip J Landscape Architecture
Archaeological Impact Assessment	AHC Ltd.
Landscape Master Plan and Cover Letter / Report	Murphy + Sheanon Landscape Architects
Photomontages	Redline Studios
Full set of engineering plans and drawings	PUNCH Consulting
Engineering Services Report	PUNCH Consulting
Traffic Assessment Report	PUNCH Consulting
Mobility Management Plan	PUNCH Consulting
Operational Waste Management Plan	PUNCH Consulting
Outline Construction Management Plan	PUNCH Consulting
Outline Construction and Demolition Waste Management Plan	PUNCH Consulting
Site Specific Flood Risk Assessment PUNCH Consulting	PUNCH Consulting
Building Lifecycle Report	METEC Consulting Engineers
Sustainability Statement/Energy Statement	METEC Consulting Engineers
Sunlight/Daylight Report	METEC Consulting Engineers
Public Lighting Plan	METEC Consulting Engineers
Ecological Impact Assessment	Openfield Ecological Services
Screening Report for Appropriate Assessment	Openfield Ecological Services
Part V Housing Letter from Housing Department	South Dublin County Council



## 9.0 CONCLUSION

The site is currently developed with 4 no. linked apartment blocks including basement level car parking, the remainder of the site is largely vacant and is need of urban renewal. The proposal would transform the underutilised section of urban block and result in a more intensive use of infrastructure, encourage affordable housing provision and promote alternative modes of travel such as walking, cycling and public transport.

The proposed residential development, on this strategically located infill site, would make a positive contribution to this prominent site in the heart of Tallaght Village. It will contribute to creating a vibrant, sustainable residential community and help meet the needs and expectations of its future (and existing) residents. It is clear that the site is underutilised and represents a positive development opportunity that would benefit the surrounding area.

In our view, the proposed development accords fully with the intent of national planning strategy (see Section 5.2.1), insofar as it comprises development on a brownfield, inner urban site on suitably zoned lands. It is well-served by public infrastructure such as the existing Dublin Bus Route No. 27 (high frequency route) which connects the site to Dublin City Centre. In addition, the site is directly adjacent to the alignment of the planned 'BusConnect' Corridor 9 (Greenhills to City Centre).

The proposal is aligned with the provisions of the both the *Tallaght Town centre Local Area Plan 2020* and the *South Dublin County Development Plan 2016-2022* and brings considerable planning gain, including *inter alia* the completion of the Greenhills Court Scheme which includes enhance communal amenity areas for existing (and future) residents, the provision of an active street frontage use (café unit) on the prominent corner of Main Street/Greenhills Road and the achievement of an exceptional standard in terms of residential quality and building performance. The scheme also provides a range of apartment types suitable for a mix of tenures and will be fit for people at different stages of the life-cycle, ranging from individuals to larger families.

Having regard to the land use zoning objective for the area, the existing underutilised nature of the site, pattern of development with the vicinity, and proximity to existing local shops and services, we believe that the proposed scheme would not seriously injure the sensitive nature of the surrounding area and would be acceptable in terms of orderly and sustainable development.

We, therefore, submit that the proposed development would be in accordance with the proper planning and sustainable development of the area.

Yours faithfully



Ian Boyle  
Associate  
Tom Phillips + Associates  
Encl.



