

An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
Telephone: 01 4149000 Fax: 01 4149104 Email: planning.dept@sdublincoco.ie

Ian Boyle,
Tom Philips & Associates
80, Harcourt Street
Dublin 2

**PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING
REGULATIONS THEREUNDER**

Decision Order Number: 1002	Date of Decision: 22-Jul-2021
Register Reference: SD21A/0139	Registration Date: 28-May-2021

Applicant: O'Mahony Holdings SPRL

Development: The demolition of three existing apartment units (c. 239sq.m) and bin store (c.18sq.m) and the construction of a residential development arranged in two building blocks (Block A & Block B) ranging from 3 to 6 storeys in height over basement level (c. 3,728sq.m, including basement). Block A comprises 11 residential apartments (c. 1256sq.m) in a 5 to 6 storey building and including a ground floor level cafe (c. 93sq.m) at the buildings south eastern corner; Block B comprises 15 residential apartments (c.1393sq.m) in a 3 to 5 storey building; The proposed development will comprise 26 new residential units (5 studio apartments, 6 1-bedroom apartments, 7 2-bedroom apartments & 8 3-bedroom apartments) with associated balconies and terraces. The proposed development will comprise a total of 40 apartment units derived from 26 new apartments and 14 existing apartments; 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 car parking spaces and 74 long-stay bicycle parking spaces and 1 motorcycle parking spaces at basement level; 2 shared car parking spaces and 20 short-stay bicycle parking spaces at surface level (15 car parking spaces, 94 cycle parking spaces and 1 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. The subject site is currently partly developed with an existing residential scheme known as Greenhill's Court comprising 17 apartment units in 4 apartment blocks ranging in height from 2 to 4 storeys, including basement car park all on a site of approximately 0.23ha. on lands bounded to the north by St Basil's Training Centre, to the east by Greenhills Road, to the west by Old Greenhills Road, and to the southeastern corner by Main Street, Tallaght, Dublin 24

Location: St. Basil's Training Centre, Greenhills Road, Tallaght, Dublin 24

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 28-May-2021 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. (a) The proposed plot ratio exceeds the maximum plot ratio in the Village neighbourhood area by 63%, as per section 3.4 of the Tallaght Town Centre Local Area Plan. Though the heights are indicated as being allowable under the Plan, the transition in height and character of Block B is not acceptable relative to its context on Old Greenhills Road, part of the ACA. The applicant is requested to reduce the scale/intensity of the proposed development to comply with the Tallaght Town Centre Local Area Plan 2020 - 2026, and to comply with the requirements of the SDCC Architectural Conservation Officer.
(b) In particular, the 5-storey element of Block B should be set further back from the northern boundary or lowered. The proposed treatment would have an overbearing visual impact and subsequently impact the residential amenity to adjoining terraces.
2. (a) The applicant is requested to respond to the following comments of the Architectural Conservation Officer in relation to the density, scale and impact on the adjoining protected structure and architectural conservation area, and how a revised scheme overcomes these issues.
"Having assessed the details of the planning application and based on the above it is considered that the applicant has failed to address the overall visual impact that the scale and height of the proposed development will have within this prominent location, which is adjacent to a Protected Structure (St. Basils), within close proximity to Tallaght Architectural Conservation Area (ACA) and a significant Protected Structure Site, 'The Priory'.
It is considered that the proposed development by nature of its close proximity, scale and height will directly impact on the visual quality adjoining Protected Structure site, St. Basils Training Centre (former National School, RPS Ref.268).
Concerns remain in that the character of the ACA will be significantly affected by the proposed apartment blocks as the new build will completely dominate the entire block which is highly visible on approach from Main Street and The Priory Demesne. The consequences of the proposed development may result in a diminished quality of character, which fails to address and adhere to

existing policies for new development within or in close proximity to an ACA in line with SDCC County Development Plan (2016-2022) and chapter 6 of the Tallaght Local Area Plan 2020.

It is considered that the proposed design with the use of light coloured brick and the insertion of brick design elements, tries to reflect elements of the existing building stocks palette. The overall finish and material type try to address the issue of a contemporary design which reflects the existing built environment and provides a level of interest and quality in providing a new build of interest is a welcomed part of the proposal. However, given that the issue of building height and mass of the proposed blocks, the overall impact cannot be negated by the design alone and therefore more consideration needs to be given to the site context and adjoining built environs."

(b) An architectural design statement has been provided as part of the planning application however an Architectural Impact Assessment has not been provided nor has details been provided in accordance with the items advised in the Tallaght LAP, with regard to new development within or adjoining the ACA. Please provide same.

3. The northern section of Block A would replace an existing 3-storey block. The block presently provides a circulation area providing access to front and rear, and 4 1-bed apartments above. The new block would provide a studio at ground floor, and 2-bedroom apartments up to 5th floor level, with a circulation area that also provides access to the 3-bed apartments in the new southern wing, as well as the front and rear access provided in the current block. From the layout provided, it is not clear that there is a need to demolish this block in its entirety, rather than building a new integrated southern wing produce the corner block. Given the actual changes sought to this recent construction, demolition of the existing building appears to be an extreme measure. The applicant is requested to address the necessity of demolishing the 3-storey block and consider a less wasteful approach to redevelopment of the site, and address this by additional information.
4. The proposed floor plans appear to show upper floors of Block B overhanging ground floor terraces, and balconies overhanging the public footpath. The applicant is requested to provide clarity with regard to any overhang over the public footpath, and if necessary obtain a letter of consent from the Council's Property section, to be submitted as additional information.
5. (a) Block A presents a light brick and spandrel panelled façade to the south and east in its southern section, with brick-clad columns at ground floor level around a glass-panelled café unit. This would be prominent and is an attractive façade in principle as seen from the east. Further north, however, the façade proposed is a busy and complicated mesh of overlapping material treatments, with little detailing, to break up the wide facade. The elevation could be simplified, with detailing or relief methods used to break up the mass, rather than irregular changes in material treatment. The applicant is requested to address this by additional information.
(b) Block B has a two-tone brick façade which appears to be used to break up the mass, and exposed steel columns to the front at ground level. The design features windows which are not vertically aligned, and ground floor terraces which would sit under the underside of the first floor, with narrower balconies above. These balconies appear to jut out over the public footpath. In trying to break up the mass of this 5-storey infill, the unaligned windows and change of brick tones are unnecessarily complicated. The applicant is requested to adjust this design by additional information. It is recommended to seek the comments of the Architectural Conservation Officer in relation to the appropriate treatment of Block B.

6. The provision of a 5-storey development at Block A brings concerns regarding increased overlooking to the private rear gardens of the existing terrace of 3 beds on Old Greenhills Road. Windows from the circulation lobby of Block B face directly into the single-storey terraces, and rear-facing bedroom windows from the northernmost units within Block B would provide a much higher view into the garden than would normally be expected of side-on development of equivalent height. The applicant is requested to make necessary revisions to reduce the risk of overlooking and loss of privacy to the adjoining site.
7. The applicant has submitted a Sunlight & Daylight Assessment for the proposed development. There are some problems with this assessment which can be revised by additional information:
 - Of the east-facing windows of the existing scheme at Greenhill Court, the southernmost windows (of those not proposed for demolition) are not assessed for daylight or sunlight. These should also be assessed for impact on vertical sky component. These serve living/kitchen rooms, and will be impacted in some way by Block A, which shall jut out in an eastward direction directly to the south of these windows. From the drawings it would appear that Block A will project out beyond a line drawn 45 degrees on a horizontal plane from the centre of these windows.
 - The rear garden of No. 3 Old Greenhills Road is shown on page 41 of the Assessment to lose a significant share of sunlight in the proposed scenario on March 21st. It appears from the image that the garden currently receives 4-5 hours of sunlight, but would now receive less than 2 across its entire surface. Yet, this plot is not mentioned in the assessment text. As per the BRE guidelines, if the resulting area which can receive 2 hours of sunlight a day is less than 0.8 of its previous value, then the loss of sunlight is likely to be noticeable, and this would not be acceptable in this instance, and a reduction in scale of the development would be required to avoid the overshadowing. Even if the guidelines were to be technically complied with, the Planning Authority would consider such the proposed loss of private amenity to the neighbouring dwelling to be unacceptable.
8. The Roads Department has assessed the proposal and has recommended a request for additional information on the following grounds:
 - (a) All items and areas for taking in charge including areas currently in SDCC's charge shall be undertaken to a taking in charge standard. Prior to development the applicant is requested to submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.
 - (b) The applicant is requested to submit details on location and number of parking spaces to be provided at the development. Please refer to Table 11.23: Maximum Parking Rates (Non-Residential) – from the SDCC County Development Plan 2016-2022. The Planning Department does not consider that these maximum standards need to be met in every instance; however the loss of 4 underground parking spaces which are used by residents of the existing scheme, and lack of additional spaces in the context of a net increase of 23 apartments, is not acceptable to the Planning Authority.
 - (c) The applicant is requested to submit a revised layout showing the car parking, bicycle parking and pedestrian routes within the development. Please refer to Table 11.22: Minimum Bicycle Parking Rates – SDCC County Development Plan 2016-2022.
 - (i) The minimum width of footpaths shall be 1.8m wide to aid mobility impaired users.
 - (ii) All external bicycle parking spaces shall be covered.
 - (iii) Footpath layout shall provide adequate connectivity around the development and footpaths on the main road.

(d) The applicant shall provide a 5% of vehicular parking spaces for mobility impaired users, and 10% vehicular parking spaces to be equipped with electrical charging points.

The Roads Report contains commentary as to the inadequacy of the proposed parking provision when compared to the South Dublin County Development Plan 2016 - 2022 maximum standards. The Planning Department does not consider that these standards need to be met in every instance.

However, the loss of 4 underground parking spaces which are used by residents of the existing scheme, and lack of additional spaces in the context of a net increase of 23 apartments, is not acceptable to the Planning Authority. In relation to number 3 above, the applicant should set out a scheme that does not result in the loss of existing amenities.

9. (a) The proposed surface water attenuation of 70m³ is undersized by 45% for a 1 in 10 year flood event. The applicant is requested to submit revised plans and calculations showing surface water attenuation increased by 45% for 1:100 year flood event. Where possible provide surface water attenuation by means of SuDS (Sustainable Drainage Systems).
(b) The applicant should consider the use of hydro breaks at roof level to attenuate surface water on green roofs.
10. The Planner's Report for Reg. Ref. SD20A/0250 which was refused permission, stated the following: 'there is a strong desire to see the whole site developed in a way that utilises the vacant land to its an appropriate potential whilst still respecting the character of the area. The current proposal would see a large section of the old petrol filling station site vacant as well as the strip of land to the east.'
The Planning Authority would prefer to see these two sites developed together as an integrated scheme, with undivided and generous communal amenity space at its centre and no restrictions on, for instance, fenestration in the western elevation of Block B.
The applicant is requested to engage with the adjoining land owner, who has written in support of this development, and to provide the Planning Authority with a masterplan showing integrated development of both sites, to provide a satisfactory impression of what the full development of these sites would look like.
11. The applicant is requested to provide a full suite of planning drawings as per the usual requirements of the Planning Regulations 2001, as amended, to accompany the submission of additional information. CGIs are also requested of a revised scheme.
12. The applicant is requested to provide a revised Landscape Plan taking account of the revised scheme submitted as additional information. The Plan should include site sections showing landscape specifications.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked “ADDITIONAL INFORMATION” and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD21A/0139

Date: 23-Jul-2021

Yours faithfully,


for **Senior Planner**