
Planning Report

Nursing Home & Independent Living Units for the Elderly

Lands to the East (and within the curtilage) of St. Mary's Priory, Old Greenhills
Road, Tallaght, Dublin 24

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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our clients, St. Mary's Medical (Tallaght) Ltd., to prepare this Planning Report. The Report accompanies a planning application to South Dublin County Council pertaining to the development of a nursing home and independent living units for the elderly on lands at St. Mary's Priory, Old Greenhills Road, Tallaght, Dublin 24 (the 'Site' hereafter). The proposed development, as per the description contained within the statutory planning notices hereafter, provides for:

(a) construction of a 4 storey nursing home building consisting of (i) 106 no. bedrooms (with ensuite); (ii) associated resident's welfare facilities; (iii) administration areas and staff facilities; (iv) with multi-function space; and pharmacy proposed at ground floor level; (b) construction of 60 no. one bed independent living units in 3 no blocks as follows: (1) Block A, a 4 story building comprising 11 no. one-bed units; (2) Block B, a part 4/part 5 storey building comprising 35 no. one-bed units; and (3) Block C, a 5 storey building comprising 14 no. one-bed units. Each unit will be provided with private open space in the form of a balcony/terrace (6sq.m). (c) The development will include communal open space and landscaping (including new tree planting and tree retention), 30 no. car parking spaces (including 3 no. limited mobility parking spaces; 3 no. EV parking spaces and 1 no. car sharing spaces); and 52 no. bicycle parking spaces. (d) The development will be served by a new pedestrian and vehicular access from Old Greenhills Road through existing boundary wall. Material from the removed wall will be repurposed within the landscape areas; and (e) The development includes landscaping, boundary treatments (including walls and railings to southern and western boundaries), an ESB Substation, SuDS drainage; road infrastructure and all ancillary site works necessary to facilitate the development.

This report assesses the proposed development in the context of the requirements of the South Dublin County Development Plan 2016-2022 and other relevant planning policy documents and guidelines. It is submitted that the proposed development accords with the proper planning and sustainable development of the area and that permission should be **granted** accordingly.

The planning application is supported by the following design team members:

- Architectural drawing pack and Design Statement prepared by JNP Architects;
- Engineering drawings and Engineering Services Report prepared by Cronin Sutton Consulting;
- Landscape Plans and Design Statement prepared by Doyle O'Troithigh Landscape + Architecture;
- Arboricultural Impact Assessment & Method Statement prepared by John Morris Arboricultural Consultancy;
- Archaeological Assessment and Architectural Heritage Impact Assessment prepared by John Cronin and Associates; and
- Appropriate Assessment Screening Report and Ecological Impact Assessment prepared by Openfield Ecology.

From the outset, it is submitted that the proposed development has been revised to address the previous reasons for refusal for a similar development under Reg. Ref. SD21A/0136. The current proposed development has been reduced in height, scale, mass and bulk with a revised layout also proposed. The previously proposed Nursing Home has been reduced in height to 4 storeys, re-sited within the site and completely re-designed. In addition, the proposed independent living units are now proposed in 3 no. blocks rather than 1 block and are reduced in height and scale noting 60 no. units are now proposed in lieu of the previously proposed 108 no. units. The overall footprint of the proposed development has been significantly reduced with a plot ratio of 1.08 proposed, the open space has been greatly enhanced, trees retained particularly on the northwestern area of the lands where the existing mature trees are retained with a looping pathway beneath their canopy. The revised design has also been proposed in the context of the Protected Structures with the proposed site layout continuing the existing campus style of the Priory and ensuring views towards the Protected Structures are not interrupted by the new proposed buildings. It is submitted to South Dublin County Council that the revised proposals address the previous reasons for refusal, and this is detailed further within this report.

2.0 Site Location and Description

The Site, which comprises an area of 0.992 hectares, is located on the western side of Greenhills Road and is currently comprised of the north-eastern end of the St. Marys Priory and the Dominican Priory campus. The Site is situated to the south of the Technical University Tallaght Campus and to the north

of Tallaght Village which is located approximately 400m away. The land is generally level and covered with grass with the northern boundary comprising a concrete wall that abuts TUD. Mature trees are present along the northwestern section of the lands whilst the easter side of the Site comprising tall poplar trees of relatively recent origin.

The Site is served by a variety of services, shops and amenities within the wider area including Bancroft Park, multiple restaurants and service provides.

In addition to its proximity to a variety of services and amenities, the Site is also served by a high standard public transport network. The Site is located within close proximity to two bus stops, Stop No. 2632 and No. 2603, which serve Dublin Bus route no. 27 which runs regularly from Jobstown to Clare Hall, via Dublin City Centre. Additionally, the Bus Connects identifies the Old Greenhills Road as a core bus corridor which will provide frequent access to Dublin City. A new bus stop adjacent to the proposed development entrance is anticipated under the Bus Connect scheme. This proposal will further enhance availability of public transport to residents, visitors and workers associated with the proposed development whilst maintaining vehicular access for servicing and for staff/visitors who cannot use public transport.

Due to the variety of amenities and services afforded to the area, it is considered that the Site would provide a high quality of life to both existing and future occupants.



Figure 1.0 Aerial photo showing the Site (red outline) in the context of the immediate area.

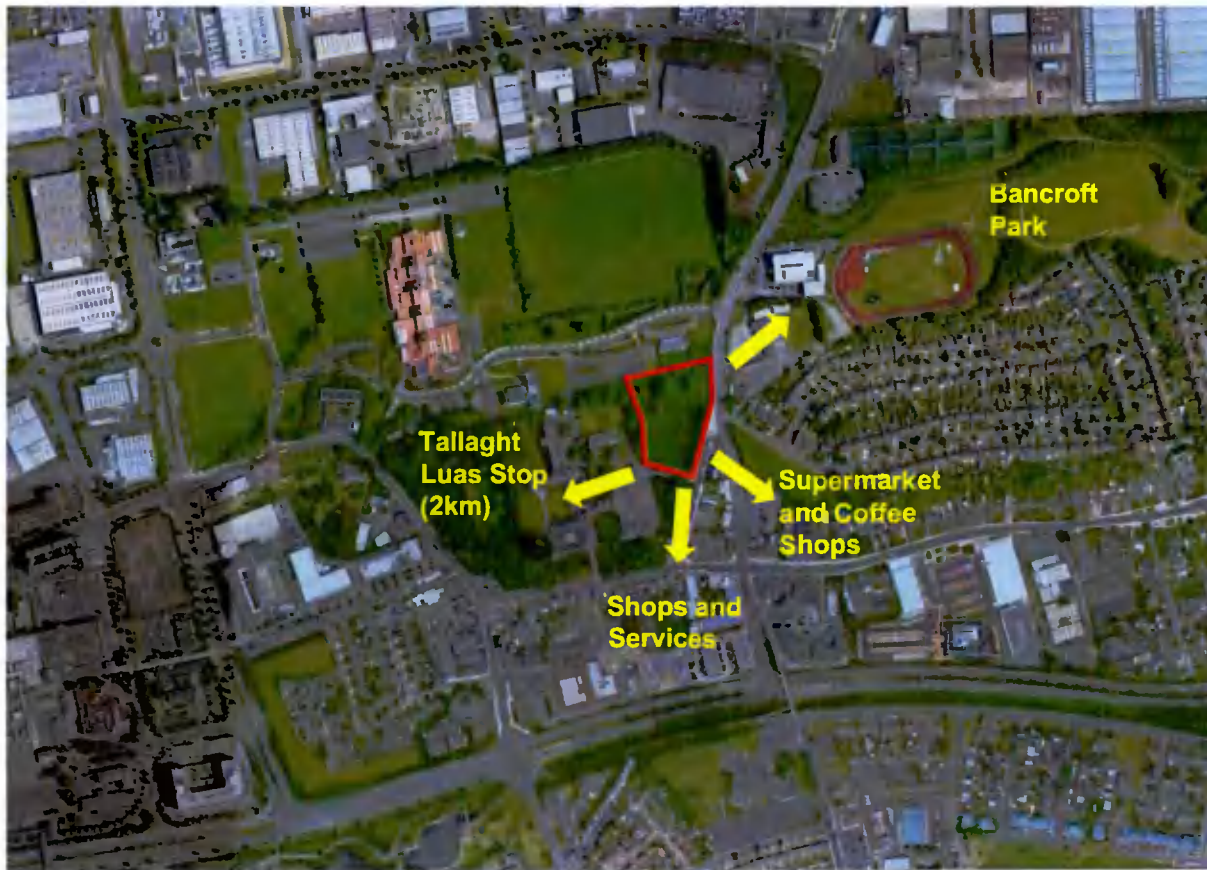


Figure 2.0 Aerial photo showing the Site (red outline) in the context of Tallaght

3.0 Site Planning History

A review of the South Dublin County Council planning register identified the following previous applications for development on the Site.

- Reg. Ref. SD07A/0661** Planning permission granted by South Dublin County Council on the 20th November 2007 for the demolition of the existing steps at the main pedestrian entrance, and construction of new low gradient (1:20) ramp, with associated railings and fences. The ramp will be constructed of materials matching the existing; the construction of a new wheelchair ramp to the west of the existing entrance steps to the administration building with associated railing. The ramp will be constructed of materials matching the existing. The handrails will be of stainless steel. St. Mary's Priory is a Protected Structure.
- Reg. Ref. SD11A/0087** Planning permission granted by South Dublin County Council on 8th June 2011 for (a) Demolition of an existing 4 storey open precast concrete fire escape stairs; (b) provision of a new 4 storey enclosed fire escape stairs with link connections to the main building as currently exist on first and second floor levels; (c) demolition of existing gate, pillars, low level wall & railing; (d) provision of new widened gate, pillars, low level wall and railings with pedestrian gate; (e) minor ancillary works (a Protected Structure).
- Reg. Ref. ED07/0020** A Section 5 declaration was issued on the 31st July 2007 by South Dublin County Council which declared that a development comprising new disabled access ramp & railings at main entrance and entrance to administration building was not exempted development.
- Reg. Ref. ED11/0011** A Section 5 declaration was issued on the 18th May 2011 by South Dublin County Council which declared that a development comprising of maintenance works and fire upgrade was exempted development.

- Reg. Ref. ED17/0016** A Section 5 declaration was issued on the 2nd May 2017 by South Dublin County Council which declared that a development comprising of internal alterations to an existing ground floor refectory area within the north wing of the property. Proposed alterations include: (a) provision of 2 new toilet blocks (1 male,1 female) as well as 1 disabled access toilet; (b) new fire doors, screens & alarms; (c) new folding partition to existing refectory; (d) reinstatement of window to existing refectory; (e) all associated works was exempted development.
- Reg. Ref. SD21A/0136** Planning Permission was refused on the 19th July 2021 by South Dublin County Council for the construction of a 5 storey nursing home comprising 112 bedrooms, day centre and pharmacy and the construction of 108 independent living units in a part 5 part 6 storey building, communal open space, landscaping, 30 no. car spaces, 86 bicycle spaces and all ancillary works. Permission was refused for 7 no. reasons which are addressed below.

The subject planning application is considered a revision of the above application. The revised proposal has had regard to the reasons for refusal, the Case Officer's planner's report and pre-planning discussions which occurred following the refusal of permission.

4.0 Response to Reasons for Refusal Ref. SD21A/0136

The lands at St. Mary's Priory were subject to a previous application for a similar but larger scale development that was refused planning permission for 7 no. reasons. The design team have reviewed the refusal reasons and internal reports of the Planning Authority and have revised the design to address the concerns of the Planning Authority. A brief description of the amendments to the proposed development to address each of the concerns is set out below:

Refusal Reason No. 1

The proposed design and layout tries to address the issue of a contemporary design within a historic site with the use of contemporary materials and building elements found within the existing building stocks. Having regard to the building height, mass and dense form of the proposed blocks, the overall impact on the protected structures cannot be negated by the design elements and finishes alone. It is considered that the proposed development fails to be sensitive within its proposed location and does not reflect the most suitable layout or design for the intended use on the subject site as the new build will completely dominate this part of the site due to its proposed, height, scale and mass which will be visible within The Priory Demesne and along Old Greenhills Road. The proposed development would impact on the Protected Structures and result in a diminished quality of character at this sensitive location which would be contrary to the policies for development within the curtilage of a Protected Structure and New Development in ACA in the Tallaght Town Centre Local Area Plan, including Objective HC1 and VL8, which states 'Protect the character and integrity of the Priory, including its parkland setting, and provide for greater public access and usage'.

Response/Revisions

The layout of the proposed development has been significantly amended to address the concerns of the Planning Authority. The Nursing Home has been re-orientated within the site and completely re-designed to now form a T-Shaped Configuration to the north of the site with the building sited to retain the mature trees in the north-western edge of the site and set back from the eastern boundary. The nursing home has also been reduced in height to 4 storeys. In addition, the 1 no. independent living unit block has been omitted and it is now proposed to provide 4 no. smaller scale blocks to the south of the site. These smaller scale blocks comprise 60 no. apartment units for the elderly and have been reduced in height to 4/5 storeys. The proposed development therefore has been significantly reduced in scale, mass and height through the introduction of smaller scale blocks and overall reduction in height across the subject lands. The development has also been designed to further setback from the eastern boundary whilst a mixture of materials and colours are proposed providing architectural interest.

Please refer to the submitting architectural drawings prepared by JNP Architects for full details.

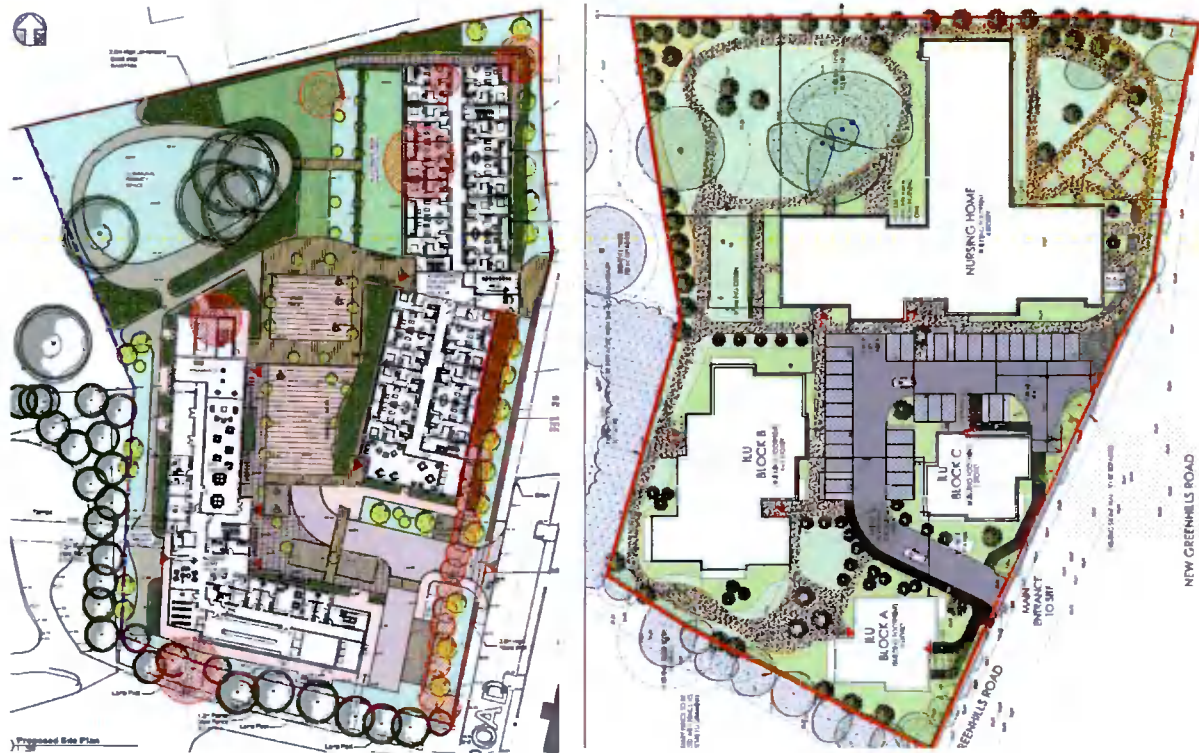


Figure 3.0 Refused Site Layout Plan and the proposed Site Layout Plan

At the outset, it must be acknowledged that the project architects have taken careful account of the reasons for refusal issued on the previously-submitted scheme. The revised proposals have the following characteristics that greatly improve the integration of the development into its historic setting:

- Existing views towards Protected Structure(s) are not interrupted by new buildings. Material selection for new buildings (i.e., stone and glass) chosen to complement Protected Structure, be of high quality and durable. Proposed site layout continues the existing campus style layout of the Priory;
- The footprint of the scheme has been reduced significantly (with the day centre being omitted, the number of independent-living units (apartments) being reduced from 108 to 60 and the residential nursing home reduced in size from 112 bedrooms to 106;
- The overall height of the proposed has been reduced from 5-6 storey to 4-5 storey. The site has the capacity to absorb this quantum of development without negatively impacting on the setting of the protected structures within the wider Priory site and the historic village centre. The proposed development by virtue of orienting the proposed buildings to match the axes formed by the existing buildings on the greater site, form triangulated spaces where the buildings are in close proximity with the eastern boundary;
- The proposed materials have been selected with regard to a more suitable overall design finish. A mixture of materials and colours adds architectural interest and breaks up the mass of the blocks.

The development will not lead to a loss of architectural heritage significance for any of the Protected Structures in the environs of the subject site. In relation to the Architectural Conservation Area, the impacts of the proposed development will be slight in that they alter the character of the environment in a manner that is consistent with existing and emerging patterns of development in Tallaght.

The proposal introduces a quality design through the appropriate use of materials and finishes. It has to be acknowledged that any development of this site will have an impact on the setting of St. Mary's Priory. In this instance, we consider the impact to be a positive one that will contribute positively to the architectural narrative of the area by providing a development that is contemporary and of its time.

Critically the new buildings' scale and massing are reflective of the scale and mass associated with the nearby Priory buildings however the designs for the new buildings are clearly of a more contemporary nature to distinguish between old and new whilst utilising a mix of modern and traditional materials to reflect and compliment those used in the Priory buildings (i.e., stone, render, metal and glass). The layout of the proposed new development continues the campus style arrangement of the Priory site overall thus achieving a suitable and appropriate pattern of development for the town centre location.

Refusal Reason No. 2

The proposed plot ratio of c1.4 is contrary to the plot ratio range standards in Section 3.4 of the Tallaght Town Centre Local Area Plan 2020 – 2026 and exceeds the 20% flexibility for planning gain outlined in Section 2.6.1 Plot Ratio. The development would constitute overdevelopment and as such would, by itself and by the precedent it would create, be seriously injurious to the redevelopment of the village centre and the development of a site.

Response/Revisions

As set out in the response to Refusal No. 1, the proposed development has been significantly reduced in scale, height and mass. The proposed independent living units are now proposed at 60 no. units in lieu of the previously proposed 108 units whilst the nursing home has also been reduced from 112 bedrooms to 106 in conjunction with a reduction in height which is also proposed. The revised proposals subject to this request therefore provide for a plot ratio of 1.08.

Section 3.4 of the Tallaght Town Centre Local Area Plan 2020-2026 indicates that a plot ratio range of 1:1 (High) is acceptable and the proposed development therefore accords with the requirements of the Tallaght Town Centre Local Area Plan 2020 in relation to Plot Ratio.

Refusal Reason No. 3

The proposed building height is contrary to the Tallaght Town Centre Local Area Plan 2020 – 2026 and the South Dublin County Council Development Plan. The site is not identified for taller buildings in the LAP and as such, the proposed development is contrary to Policy UC6 Objective 3 of the Development Plan which seeks 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. The Tallaght LAP specifies heights of 3-4 storeys for 'other frontages' (the subject site is neither designated as a primary or secondary frontage). Under Section 3.4 'The Village' and particularly Objectives VL6 and VL8, the Tallaght LAP requires development to be responsive to the local context, and seek to protect and enhance the setting of protected structures and the ACA. The proposed development is contrary to the proper planning and sustainable development of the area.

Response/Revisions

The height of the proposed development has been reduced from 5-6 storeys to now provide for a 4-5 storey development. 4 storeys are proposed to the north (Nursing Home) and to the south of the site (Blocks A and B) with 5 storeys proposed within the centre of the site.

Under the Tallaght LAP, there are no specific height policies designated for the subject lands. It is noted that there is 4-6 storey height designation on lands to the south east along Greenhills Road with 4 storey apartments existing to the east of the lands on Greenhills Road.



Figure 4.0 Figure 3.10 of Tallaght LAP illustrating Heights – no height designation for subject lands

Therefore, the proposed reduced height of 4 -5 storey at the proposed location will be easily absorbed by the receiving environment. The existing trees on site to the north of the car park ensure that the proposed development will not be highly visible along the Old Greenhills Road and on approach into St. Marys Dominican Priory and Church from Main St, Tallaght.

Furthermore, the development will not lead to a loss of architectural heritage significance for any of the Protected Structures in the environs of the subject site. In relation to the Architectural Conservation Area, the impacts of the proposed development will be slight in that they alter the character of the environment in a manner that is consistent with existing and emerging patterns of development in Tallaght.

Policy UC6 *It is policy of the Council to support varied building heights across town, district, village and local centres and regeneration areas in South Dublin County.*

UC6 Objective 1 *To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two-storey housing.*

UC6 Objective 2 *To ensure that higher buildings in established areas take account of and respect the surrounding context.*

UC6 Objective 3 *To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centre, Regeneration and Strategic Development Zones, and subject to an approved Local Area Plan or Planning Scheme."*

It must also be noted that Policy UC6 Objective 3 sought to direct tall buildings that exceed five storeys in height to strategic landmark locations. The revised proposed development has reduced the height of the proposed development to 5 storeys and therefore the revised proposal does not fall within the scope of a tall building under UC6 Objective 3. Furthermore, it is considered that the stepped approach in height of 4 to 5 storeys accordance with UC6 Objective 1 which seeks to encourage varied heights in villages and indeed the proposed development takes account and respects the surrounding context. Therefore, it is submitted that the proposed development accords with Policy Objective UC 6 of the Development Plan and with the Tallaght LAP

Refusal Reason No. 4

The buildings would be located in close proximity to the boundary walls, particularly on the eastern side of the site, which coupled with the height proposed would result in a poor and cramped layout. There are also concerns from a heritage perspective regarding the proposed new entrance and the impact that this would have on the setting and character of the protected structure. The public open space is poorly located away from the majority of the Nursing Home and Apartment block and does not encourage public usage. The existing trees along the east boundary would be compromised by the proximity of the eastern block, and tall trees at this location would significantly impact on light to the apartments. For these reasons the proposed development would not be in accordance with the Tallaght Town Centre Local Area Plan and the proper planning and sustainable development of the area.

Response/Revisions

The proposed development has been re-designed to orientate the proposed buildings to match the axes formed by the existing buildings on the adjoining site. The buildings have been re-designed such that there are greater setbacks from the eastern boundary wall are now proposed. The proposed new entrance would not unduly negatively impact on the setting and character of the protected structure whilst the revised layout is such that the impact on the eastern boundary is reduced. The public open space has been intentionally designed to retain the existing mature trees to the northwest of the site and is accessed by a circuitous walking route all around the site providing good access to same. The revised proposal therefore addresses the previous reason for refusal no. 4. In addition, the material of the removed wall will be repurposed throughout the landscaped areas of the development site, particularly as 'dwarf walls' around the green spaces and seating areas. This allows the wall associated with the priory to be retained on site, adding to the amenity.

Refusal Reason No. 5

The proposed parking provision of 30 car parking spaces would seriously under provide for the proposed development, which the SDCC Roads Department has recommended would require 43 car parking spaces, inclusive of 7 spaces for complementary uses which would be better provided separately (50 spaces in total). The proposed provision would have knock on impacts in terms of illegal parking on the site and on the surrounding road network.

Response/Revisions

The proposed development provides for 30 no. car parking spaces for the proposed development. It must be noted that the proposed development has been significantly reduced from 108 independent units to 60 units with the nursing home reduced from 112 no. bedrooms to 106 no. bedrooms. The car parking provision proposed has been assessed with respect to the Development Plan which defined the maximum car parking provisions for development. It is contended that the level of car parking has been justified given the intended use of the development. The proposed development shall have a total car parking provision of 30 no. spaces and thereby does not exceed the maximum quantum permitted by the Local Authority development plan. Please refer to the enclosed documents prepared by CS Consulting for a breakdown on the proposed car parking.

It is submitted to the Planning Authority that refusal reason No. 5 has been satisfactorily addressed.

Refusal Reason No. 6

The applicant has provided a Conservation Statement only in respect of the proposed development. Under Section 6.2.1 of the Tallaght Town Centre Local Area Plan, a detailed Conservation Plan must be prepared for the overall Priory site in advance of any significant development being considered. In the absence of such a plan led approach, the application is considered to be contrary to the proper planning and sustainable development of the area.

Response/Revisions

The planning application is accompanied by a detailed conservation plan for the wider Priory site. The conservation plan discusses the significance of the Priory lands and outlines measures for how new development will be accommodated without diminishing cultural heritage significance.

Refusal Reason No. 7

The applicant has not submitted any form of Ecological Assessment in support of the proposal. Given the presence of mature trees and older buildings which could support bat roosts, this is a significant concern. The proposed development would therefore be contrary to Policy HCL15 of the South Dublin County Council Development Plan 2016 - 2022. The applicant has not addressed Objective VL9 of the LAP which seeks to protect and preserve the heronry located within the site, and the proposed development would therefore be contrary to that objective.

Response/Revisions

An Ecological Impact Assessment has been completed by Openfield Ecology and included with the planning application. The assessment finds that there are 2 no. potential moderate impacts arising from the development. Mitigation measures have been recommended to negate these impacts. These measures will be carried out during construction and operational phase of the development.

5.0 Pre-Planning Consultation

Prior to the lodgement of the revised planning application, the design team engaged in pre-planning discussions with South Dublin County Council. It is noted that the previous planning application was also the subject of pre-planning discussions, which also informed the design of the scheme. The details of each pre-planning consultation provided below.

5.1 Pre-Planning Consultation Meeting No. 1

An initial pre-planning consultation was held on the 8th of December 2020 with the Applicants and the following members from South Dublin County Council, Jim Johnson (Planning), Barry Henn (Planning), Irenie McLoughlin (Architectural Conservation Officer), John Joe Hegarty (Roads), Aws Taki (Roads), Ronan Toft (Drainage) and Laurence Colleran (Public Realm).

5.2 Pre-Planning Consultation Meeting No. 2

A second pre-planning consultation meeting request was submitted to South Dublin County Council following receipt of feedback received from the initial meeting. The second submission provided a review of the issues raised by the Planning Authority from the initial meeting and provided the design team's response to the feedback. This is submitted below:

- *Definition of elderly* - Older people over 65 and who are registered on the Councils Housing List.
- *Does proposal fall under SHD* - The extent of non-residential accommodation forming part of the overall proposed development exceeds the threshold for an SHD Planning process.
- *Zoning as VC*
- *Heights and Layouts; positioning of buildings to boundaries; separation distances –*

In response to this concern, it is submitted that the Local Area Plan does not provide specific limits on heights for this location however 4-6 storey residential is noted for those lands situated at the junction of Old Greenhills Road/Main Street and which extend a distance along Old Greenhills Road. The proposed site fronts onto both Greenhills Road and Old Greenhills Road. Greenhills Road is noted as a Primary Route whilst Old Greenhills Road is noted as being a Secondary Route. The LAP section on Height Strategy (p.27) advises heights on Primary Routes to be up to 6-7 storey residential + 1 recessed / 5-6 storey non-residential + 1 recessed with heights on Secondary Routes to be 4-6 storey residential and 3-5 storey non-residential. The proposed apartment block, taking account of the above guidance and with frontages onto both Primary and Secondary Routes as well as the surrounding context, has been redesigned to 5 storey plus a recessed 6th storey to comply. The Nursing Home (also residential and part commercial) has been redesigned to be part 5 storey and part 4 storey (with part recessed 5th storey) and is commensurate with height of nearby existing Retreat House. The proposed heights are in keeping with heights of other buildings in the Priory campus and below the heights of the existing row of Poplar trees fronting Old Greenhills Road and do not interfere with views towards the existing buildings within the Priory lands. Heights are also compliant with the LAP requirements.

The rationale for the proposed design has been detailed in the accompanying documentation prepared by the project architects.

The Nursing Home is planned to be 7m from western legal/planning boundary and 4m from southern legal/planning boundary. However, lands extend beyond the legal/planning boundaries by a further 6m to the south and between 6 – 12m to the west before reaching the edge of the Priory access roads and this provides a buffer space between the proposed development and Priory infrastructure. As there are no buildings immediately west or south this distance is appropriate in defining the edge of the development and facilitates retention of the existing trees along both boundaries as well as providing good amenity space (south and west facing) for Nursing Home residents.

The apartment building has been redesigned and repositioned to be 5m (at its closest point) from the northern boundary and 34m from the existing creche.

The positioning of the buildings ensures a clearly defined edge for the development on all boundaries without any adverse effect on existing surrounding buildings.

The proposed buildings have been re-positioned to ensure closest opposing windows to habitable rooms within the development are a minimum distance of 22m.

- *Protected Structure, Architectural Conservation Area (ACA) and Area of Archaeological Importance* - A Preliminary Built Heritage Assessment has been prepared to inform the design for the proposed development taking account of the protected Structure and ACA. An onsite physical Archaeological Test has been carried out with no findings observed.
- *LAP Objectives* – A review of the LAP Objectives for the site location has been carried out and described in more detail in the Item above.
- *Public Open Space* – The proposed Open Space has been enlarged with adjacent parking and roads re-designed to improve access, visual quality and use. The proposed Open Space is positioned to ensure easy access for both residents of the Nursing Home and Apartments. Furthermore, this location incorporates retained Category A and B trees as a feature element, visually integrates with adjacent Priory Open Space to the west and is overlooked by residents of the apartment building.
- *Trees* – The majority of existing trees are to be retained including those noted as Category A and B in the completed Tree Survey and Assessment. The existing Poplar trees along Old Greenhills Road have been assessed as of low ecological value and are damaging the existing stone wall due to root pressure. These trees are proposed to be replaced by more appropriate species along the eastern boundary with Columnar Oak trees which will improve habitat and biodiversity as well as providing an attractive feature in this location.
- *Development Subordinate to Priory* – A Preliminary Built Heritage Assessment has been prepared to inform the design for the proposed development which notes that the location, layout building form and heights will not have any adverse effect on the Priory buildings and that the proposed site layout is in keeping with the campus style of development already existing within the Priory lands. Building heights and designs as well as simple form/use of materials, mature tree screening and distance from existing buildings ensures the proposed development will be seen as subordinate to the Priory.
- *Additional Entrance* – The owners of the Priory lands have confirmed that they will not permit the existing Priory access on Old Greenhills Road to be used as an access for the proposed development site and therefore there is no alternative other than to create a new access from Old Greenhills Road. In regard to potential for creating precedent, there are no other lands east of the Priory complex that would require own separate access through the existing stone boundary wall. Furthermore, there are no other development sites within the Priory lands that would require additional access points. The proposed vehicular/pedestrian access through the existing stone wall would be low key in regard to design so as not to compete with the nearby Priory entrance (with its curved walls) and would be done in conjunction with all repairs necessary to the existing wall using reclaimed stone. Surplus stone will be retained for future repairs as necessary and potentially to create hard landscape features within the proposed development.

In addition to the concerns of the Planning Department above, the following concerns were raised by the Conservation Architects; Drainage Department; Drainage Department; and Roads Department, respectively:

Conservation

- *First development within Priory lands not associated with historical use*
- *Protected Structure* – A Preliminary Built Heritage Assessment has been prepared to inform the design for the proposed development taking account of the protected Structure and ACA.
- *Concerns with Height* – Proposed building heights are compliant with the general guidance in the LAP. Building height of the Nursing Home (closest proposed building to the Priory) is similar to that of the existing Retreat House and none of the proposed buildings obscure views to the Priory and all are well screened by existing mature trees along the site boundaries with the Priory.
- *Proposal needs to be conservation led* – A Preliminary Built Heritage Assessment has been prepared to inform the design for the proposed development taking account of the protected Structure and ACA. The principal change advised by the conservation architect has been the re-configuration of the proposed massing of the nursing home. This building now addresses the grounds of the Priory and responds and engages more with the wider campus. The building height as it presents to the south has been lowered and the project architect has introduced a glazed link to the corner of this L-plan building. The glazed element will have the effect of reducing massing and providing more visual engagement between the nursing home and The Priory.
- *Site context important – how would it be viewed from site and surrounding area* – Building height of the Nursing Home (closest proposed building to the Priory) is similar to that of the existing Retreat House and none of the proposed buildings obscure views to the Priory and all are well screened by existing mature trees along the site boundaries with the Priory.
- *Review recent decision SD20A/0250*
- *Review Watery lane in Clondalkin*
- *How would site be demarcated without impacting Protected Structure* – The site is already well defined by existing mature trees on the southern and western boundaries as well as low metal painted railings. The proposed building would be located behind the existing trees and existing railings replaced with higher quality railing (maximum 1.5m high) and new hedge planting.
- *Removal of wall (a Protected Structure) existing entrance should be used* – The owners of the Priory lands have confirmed that they will not permit the existing Priory access on Old Greenhills Road to be used as an access for the proposed development site and therefore there is no alternative other than to create a new access from Old Greenhills Road. In regard to potential for creating precedent, there are no other lands east of the Priory complex that would require own separate access through the existing stone boundary wall. Furthermore, there are no other development sites within the Priory lands that would require additional access points. The proposed vehicular/pedestrian access through the existing stone wall would be low key in regard to design so as not to compete with the nearby Priory entrance (with its curved walls) and would be done in conjunction with all repairs necessary to the existing wall using reclaimed stone. Surplus stone will be retained for future repairs as necessary and potentially to create hard landscape features within the proposed development.
- *Poplar Trees* – The existing Poplar trees along Old Greenhills Road have been assessed as of low ecological value and are damaging the existing stone wall due to root pressure. The Poplar trees are in maturity and reaching the end of their normal lifespan. These trees are proposed to be replaced by more appropriate species along the eastern boundary with Columnar Oak trees which will improve habitat and biodiversity as well as providing an attractive character feature in this location with a mature height of c.17m.
- *Finishes and materials* – The designs have been revised to use granite stone panels as the main solid material in both the proposed apartments and Nursing Home.
- *Any new access would be dependent on visual impact* – The proposed new access through the stone wall would be a very simple opening without embellishments. 3D photomontages will be prepared to illustrate design.

Drainage

- *Service maps for foul, water etc* – Record maps for all utilities have been obtained and used to inform designs for new utility infrastructure and connections.
- *SuDs* – A range of SuDS measures are to be provided to include green roofs, tree pits, permeable paving, etc. full details will be provided with Planning Application.
- *Surface Types* – Full details will be provided with Planning Application of surface types including calculations and run-off coefficients.

- *Irish Water* – A Pre connection enquiry has been submitted to Irish Water and response awaited.
- *Flooding* – The OPW/RPS Flood Maps have been reviewed and the site is not affected.

Public Realm

- *Tree survey* - A detailed tree survey and assessment has been completed.
- *Retention of Category A & B trees encouraged* - All Category A & B trees have been identified and will be retained.
- *Bio-diversity value of trees / Open to looking at replacement trees for Poplars* - Majority of trees are to be retained except the row of Polar trees along Old Greenhills Road which are to be replaced by more appropriate species along the eastern boundary with Columnar Oak trees which will improve habitat and biodiversity as well as providing an attractive character feature in this location with a mature height of c.17m.
- *SuDS, water should be cleaned and used for biodiversity.*

Roads

- *Access – have regard to Bus Connects route* - Bus Connects route reviewed. This still permits new vehicular and pedestrian access as proposed. The Priory owners will not permit existing access to be used for the proposed development.
- *Traffic* - TRICS to be submitted with Planning Application.
- *Parking, zone 2* - Parking provision will not exceed maximum parking standards and will reflect the end user requirements and proximity to public transport and local amenities.
- *Layout - Autotrack exercise* will be carried out to ensure adequate manoeuvrability
- *Mobility Plan* - A Mobility Plan will be developed and submitted with Planning Application
- *Two Mobility spaces required, 10% of car spaces to have electrical charging points and all to have ducting for future charging points.*
- *Fire tender access - Autotrack exercise* will be carried out to ensure adequate manoeuvrability.
- *Bin/refuse trucks - Autotrack exercise* will be carried out to ensure adequate manoeuvrability, set down and turning areas will be shown on site plan.
- *Traffic & Transport assessment required* – This has been included in the planning application.
- *Demolition/Site clearance* - Management Plan included with the planning application.
- *Bicycle parking* - CDP standards to be complied with.

Following the second pre-planning consultation, the planning application was lodged to South Dublin County Council and subsequently refused.

5.3 Pre-Planning Consultation Meeting No. 3

Following refusal of the planning application, the scheme was revised to overcome the refusal reasons and a third pre-planning consultation occurred on 19th November 2021, under Ref. PP112/21. In attendance were members of the design team and the following members of South Dublin County Council, Jim Johnson (Planning), Irenie McLoughlin (Architectural Conservation Officer); Brian Harkin (Drainage); and Yasir Khan; (Roads).

The Planning Department noted that the use was acceptable in principal subject to compliance with the various relevant sections, policies and objectives of the South Dublin County Development Plan 2016-2022 and the Tallaght Local Area Plan 2020-2026. Compliance with planning policy is set out in a subsequent section of this report.

Clarification of 'Independent Living Units' was also requested by the Planning Department. The units would be linked to the nursing home operators and would only be occupied by 'older persons' who require them. 'Older persons' is defined as people above the age 55. The units will have access to the services and entertainment provided by the nursing home operators but cater to people who can live independently and without the need for full-time care.

The Planning Department noted and welcomed the increased set back from boundaries and the reduced height of the buildings. It is contended that the height is acceptable along the northern approach to Tallaght. The scheme does not overbear and will be of a high-quality design.

Concerns were raised with regards to the proposed access and the resultant loss of material. The Design Team provided discussion on how no precedent would be set for the removal of this wall, particularly within the Priory lands themselves and that the landowners of the priory would not consent to the use of the existing entrance and access road. The Planning Authority noted that an innovative approach may be welcome. In response to this, the Design Team have proposed to reuse any removal wall materials throughout the landscaped areas of the site. These will be in the form of a 'dwarf walls' which we would consider a unique opportunity to create a sense of place and connection with the Priory for the residents of the nursing home and independent living units.

Public open space was discussed with the Planning Authority who emphasised the importance that all users feel comfortable using it. The retention of trees was also welcomed. In response to this, the public open space has been designed to ensure it is high quality and useable by all. To facilitate the elderly nursing home residents a continuous, looped path connects each of the open spaces before returning to the nursing home. A detailed landscape report has been submitted with this planning application which discusses the key aspects of the landscape proposal. A total of 5,019sq.m of open space is provided within 4 no. distinct areas.

The Conservation Section noted their favourable elements of the revised scheme including the interaction of the blocks; the varying identities of each block; the provision of additional open space with higher amenities. The 'village hub' or 'village within a village' concept was also encouraged. The scheme has been designed to act as a village hub which particularly caters to the requirements of the nursing home residents and the older people living independently on the site. The Conservation Section also made reference to a similar development within Naas. Subsequent research was carried out and the referenced development was reviewed.

The Drainage Department provided commentary on the requirements of the re-submitted planning application, including a Flood Risk Assessment and SuDS provision. These have both been provided, as detailed in the drawings and reports prepared by CS Consulting.

The Roads and Transport Department provided their commentary on the scheme including car and cycle parking standards and the requirement of a Construction Waste Management Plan; Traffic and Transport Assessment; and Mobility Management Plan. Each of these has been prepared by CS Consulting and included with the planning pack. The quantum of car and cycle parking provided is considered appropriate given the nature and intended occupants of the scheme. Car and bicycle ownership levels will be very limited. It is anticipated that staff will live nearby and travel via public transport. The Roads Department confirmed that 30 no. parking spaces would be sufficient for the development given the communal layout arrangement and usage.

It is contended that the revised scheme, as lodged, has been guided by the previous refusal reasons and Pre-Planning discussions and is now an appropriate, well-designed development which protects the surrounding area while providing much needed accommodation for older people.

6.0 Proposed Development

The proposal consists of the construction of a 4 storey, 106 no. bedroom nursing home building. The nursing home will also provide for associated resident's welfare facilities; administration areas and staff facilities. The ground floor level of the nursing home will also provide for a pharmacy.

The proposal also provides for the construction of 3 no. 4/5 storey blocks comprising 60 no. independent living units as follows:

- Block A at 4 storeys in height comprising 11 no. 1 bed units;
- Block B at 4-5 storeys in height comprising 35 no. 1 bed units;,,
- Block C at 5 storeys in height comprising 14 no. 1 bed units;

The development will include communal open space and landscaping (including new tree planting and tree retention), 30 no. car parking spaces (including 3 no. limited mobility parking spaces; 3 no. EV parking spaces and 1 no. car sharing spaces); and 52 no. bicycle parking spaces.

The development will be served by a new pedestrian and vehicular access from Old Greenhills Road through existing boundary wall. Material from the removed wall will be repurposed within the landscape areas.

The development includes landscaping, boundary treatments (including walls and railings to southern and western boundaries), an ESB Substation, SuDS drainage; road infrastructure and all ancillary site works necessary to facilitate the development.

The design of the proposed development has taken on board the comments of the Planning Authority at the pre-planning consultation meeting and has been revised to address the concerns.



Figure 5.0 Proposed site plan of the development.

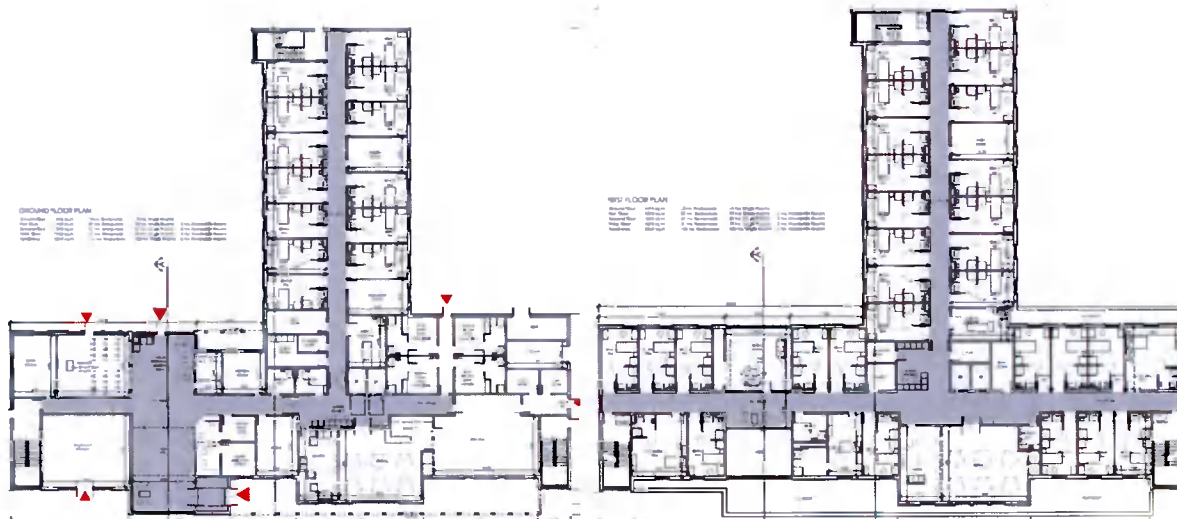


Figure 6.0 Ground (left) and first (right) floor plans of the proposed Nursing Home.

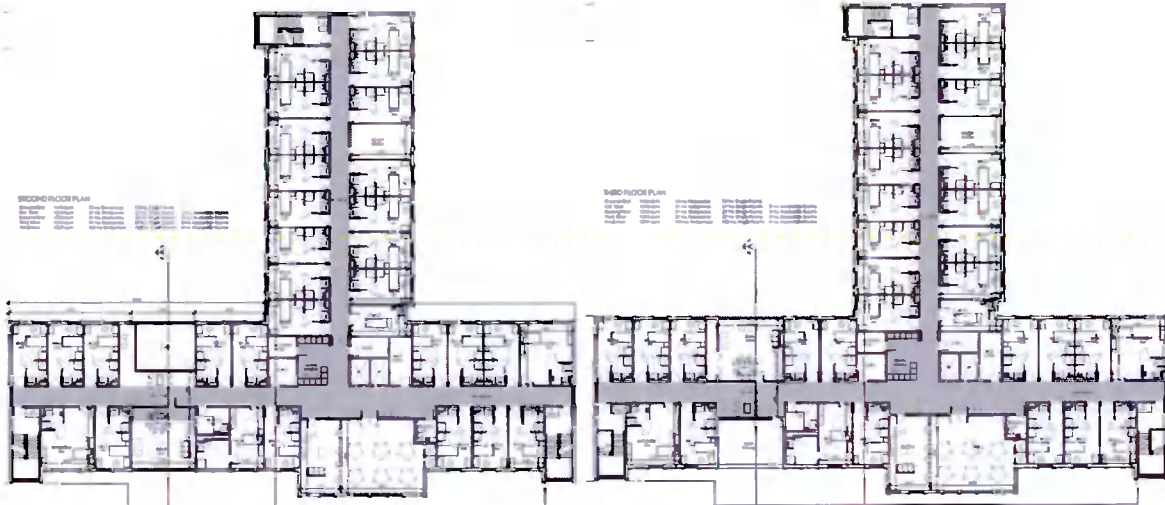


Figure 7.0 Second (left) and third (right) floor plans of the proposed Nursing Home.

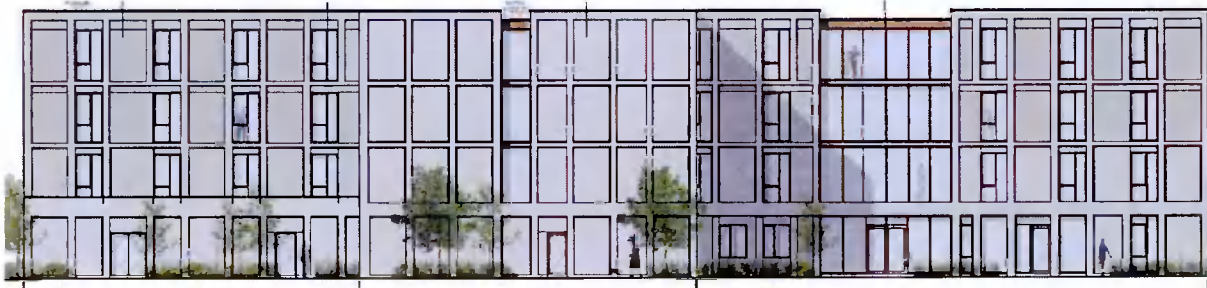


Figure 8.0 North elevation of the proposed nursing home.

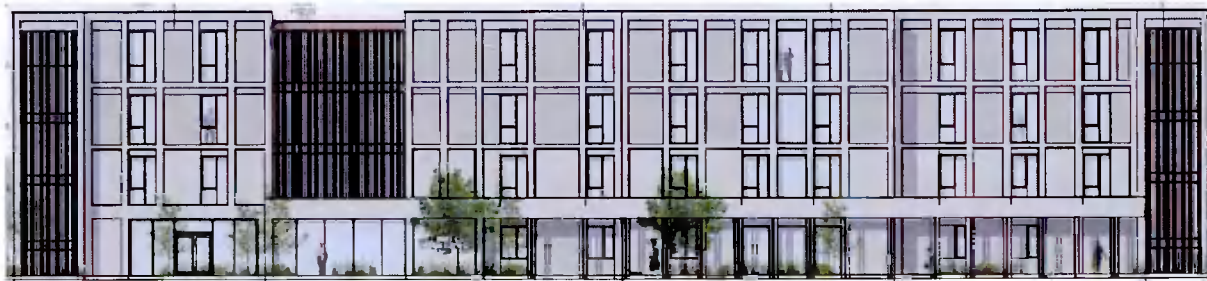


Figure 9.0 South elevation of the proposed nursing home.



Figure 10.0 East Elevation A of the proposed nursing home.



Figure 11.0 West Elevation of the proposed nursing home.

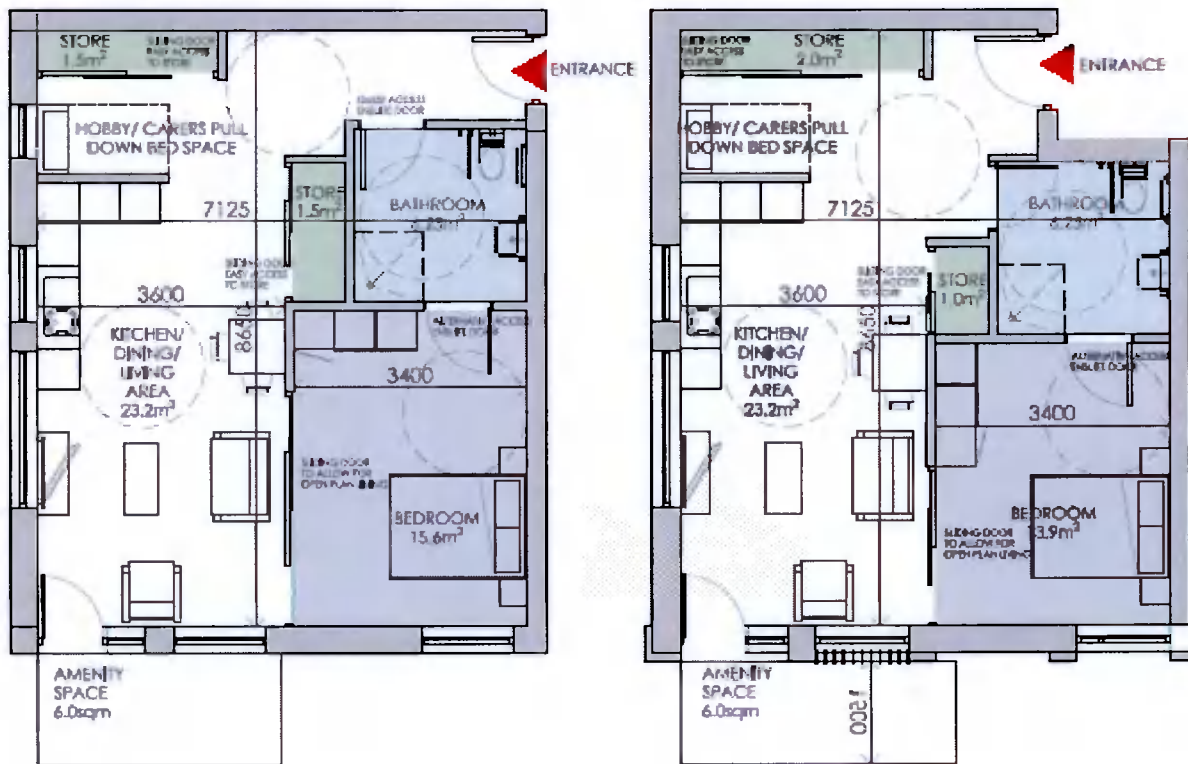


Figure 12.0 Typical ground floor plan of the independent living blocks House Type 1 (left) and 2 (right).

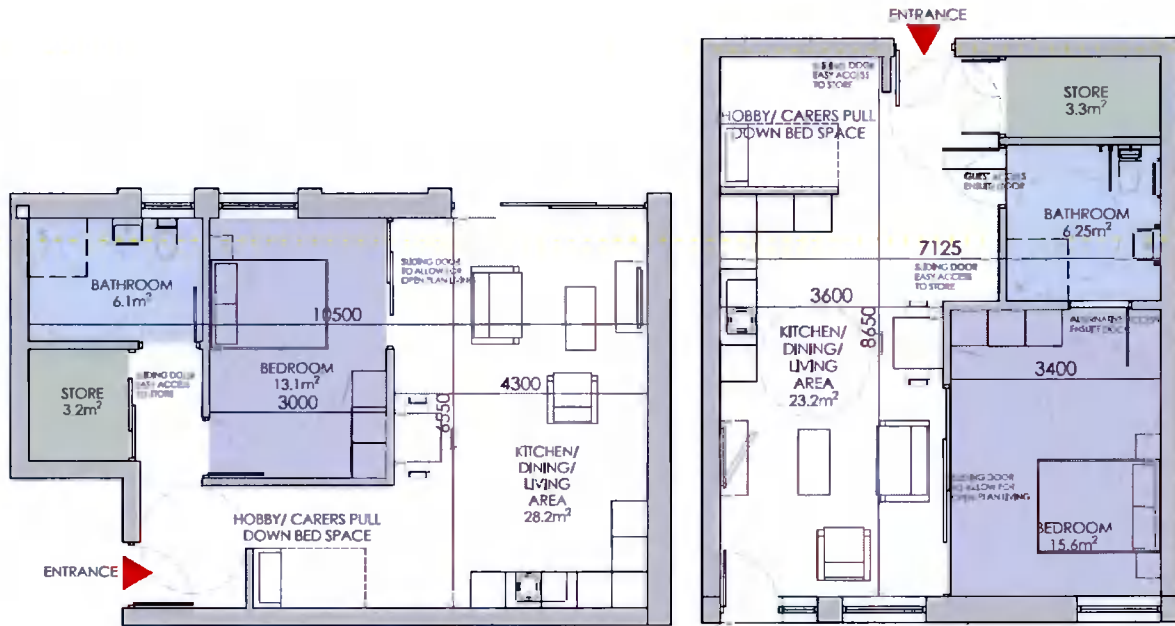


Figure 13.0 Typical ground floor plan of the independent living blocks House Type 3 (left) and 4 (right).

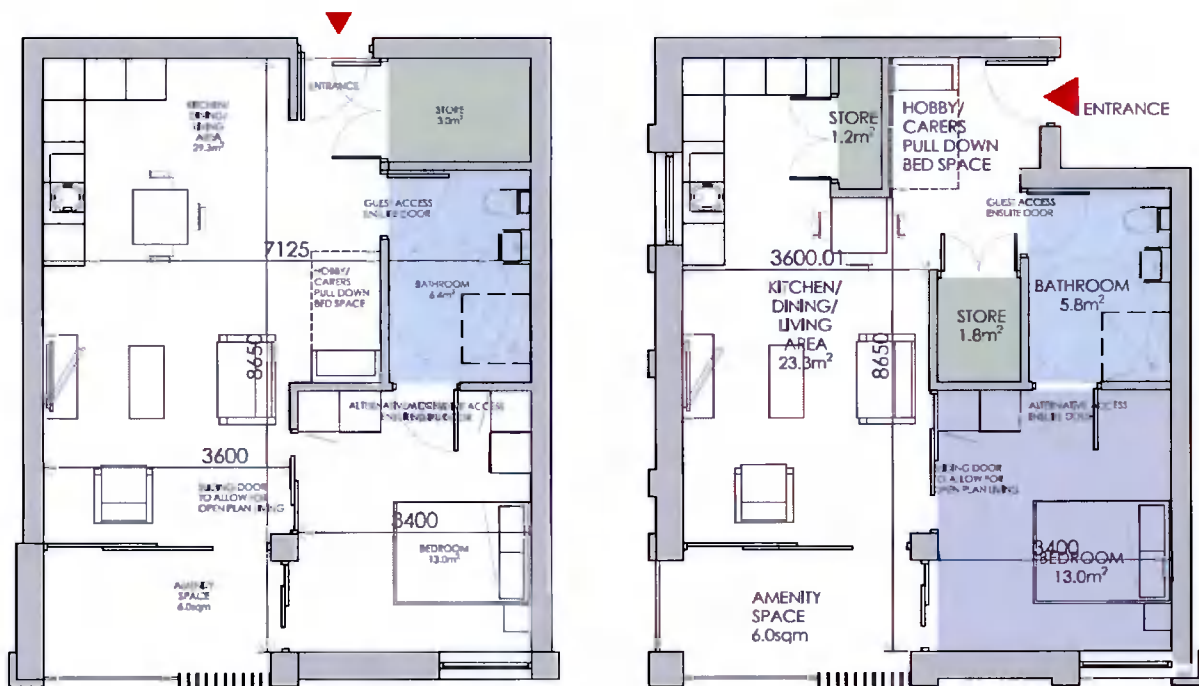


Figure 14.0 Typical first floor plan of the independent living blocks House Type 5 (left) and 6 (right).

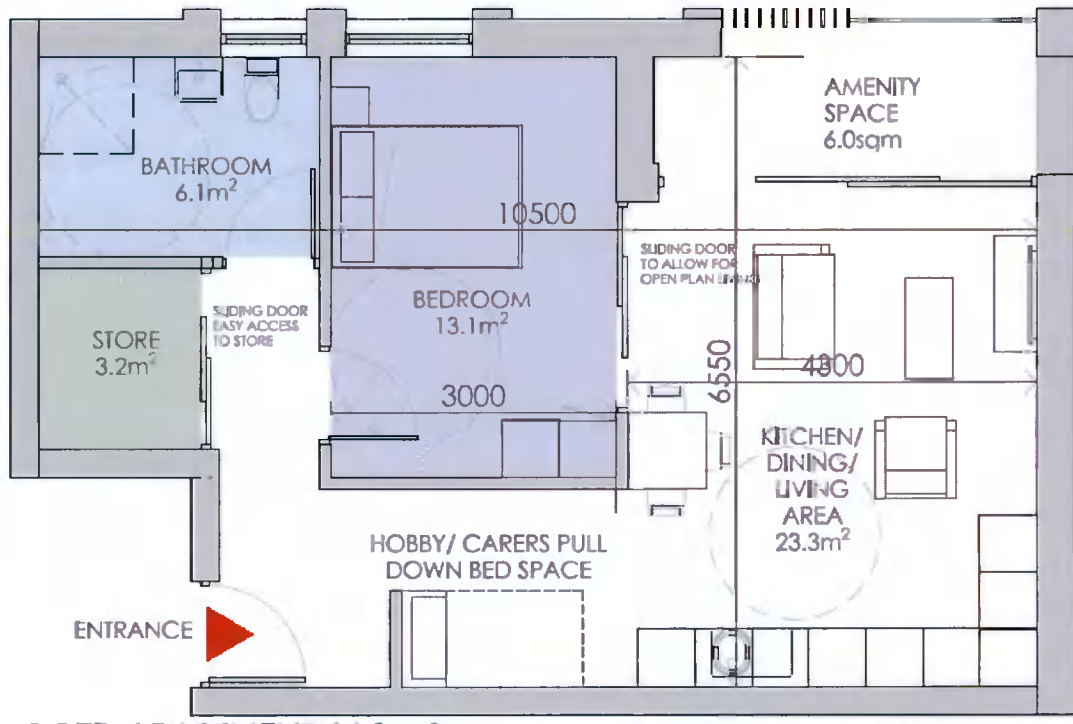


Figure 15.0 Typical first floor plan of the independent living blocks House Type 7.



Figure 16.0 East elevation of Independent Living unit Block A.



Figure 17.0 North elevation of Independent Living unit Block A.



Figure 18.0 East elevation of Independent Living unit Block B.



Figure 19.0 South elevation of Independent Living unit Block B.



Figure 20.0 East elevation of Independent Living unit Block C.



Figure 21.0 South elevation of Independent Living unit Block C.



Figure 22.0 Computer generated visual of proposed development as viewed from Old Greenhills Road.



Figure 23.0 Computer generated visual of proposed development as viewed internally.



Figure 24.0 Computer generated visual of proposed development as viewed internally.

The variety of ground floor activities in both buildings along with the hard and soft landscape features and positioning of buildings achieves a vibrant and visually interesting external space for the development and an attractive outlook for residents of the independent elderly apartments and Nursing Home.

The proposed development aims to create a 'Village Hub' within Tallaght. Landscape design along with building content and layouts play an important role in achieving this concept. A series of open spaces

are proposed along with a looped pathway connecting each. The Independent Living Units have a large communal Open Space area located immediately adjacent which then connects to a large communal Open Space area in the north western part of the site which will be used as a social space shared by residents of the Independent Living Units as well as residents of the Nursing Home. This shared Open Space will also incorporate the retained category A trees as well as artificial nesting facilities to encourage Heronry. Adjacent to this shared Open Space will be a new bowling green for use by all residents. The nursing Home, at the main entrance will incorporate a range of social spaces for use by all residents including a coffee dock, Pharmacy, contemplation space/Oratory, hairdresser and Consultation Room for GP's and Allied Healthcare professionals (e.g., chiropodists, Speech & Language Therapists, Dieticians etc). These facilities (which will have direct access to the shared Open Space, will create a focal point for the Village Hub and provide a quality and visually interesting appearance overall.

In addition, located on the ground floor of the Independent Living Unit Block B, a shared social space is provided (Garden Activity Pavilion) for residents. This facility, with views towards the development entrance, is designed for a variety of uses including coffee mornings, cookery classes, yoga classes, lifestyle education etc and reinforces the Village Hub concept

7.0 Planning & Policy Context

7.1 National Planning Framework: Project Ireland 2040

Project Ireland 2040- National Planning Framework seeks a more balanced and concentrated growth, particularly within the five major cities in Ireland. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas as per the following commentary from Project Ireland 2040 document:

'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. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'

Furthermore, the following national policy objectives are also considered relevant in context of the development proposal:

- | | |
|--------------------------------|--|
| National Policy Obj. 3a | <i>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.</i> |
| National Policy Obj. 3b | <i>Deliver at least half (50%) of all new homes that are targeted in the five cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i> |
| National Policy Obj. 3c | <i>To target the delivery of 550,000 additional households to 2040.</i> |

The proposed development is consistent with the above as it involves the provision of a nursing home and independent living units for older people. The proposal will increase the number of residential units within Dublin in accordance with the national policy objectives above. The Site is within close proximity to existing facilities and public transport services. The proposed development will facilitate the projected growth in population and in persons in employment in the Eastern and Midland Region as envisaged by the National Planning Framework, by providing suitable accommodation for elderly people in a central accessible location.

7.1.1 Project Ireland 2040 National Development Plan 2018-2027

The National Development Plan 2018—2027 sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock, set out therein. The National Development Plan demonstrates the Government's commitment to meeting Ireland's infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period. The development plan includes major investment projects and programmes relating to health. The plan contains the following commentary:

'The main outcome of delivery of these projects and programmes are healthcare facilities that allow for implementation of new models of care and for delivery of services in high quality modern facilities. This will facilitate the transition of patients to the most appropriate care settings ranging from complex acute care to primary and community services.'

'Funding has been allocated in the NDP for the replacement and refurbishment of community nursing homes and long term residential care facilities for older people and people with disabilities. Accommodation standards require significant investment through upgrade, refurbishment or replacement. Over the next five years, this will provide for the replacement and refurbishment of 90 public nursing homes across the country. The NDP also provides for a public private partnership project to deliver community nursing homes.'

It is considered that the provision of a nursing home and independent living units for older people is in accordance with the above.

7.2 Action Plan for Housing and Homelessness, July 2016

The *'Action Plan for Housing and Homelessness'* was published in July 2016 as part of the Government's Rebuilding Ireland initiative. This is a whole-of-Government plan which seeks to double residential construction output to 25,000 homes per year by 2020; deliver 47,000 units of social housing by 2021; make the best use of existing housing stock; and lay the foundations for a stronger, more stable private rented sector. The Action Plan seeks to address existing issues of housing supply and homelessness in Ireland through five 'Pillars'. Pillar 2 - *'Accelerate Social Housing'* includes commentary providing for the provision of housing for older people. The following commentary is noted:

'The ageing of our population represents one of the most significant demographic and societal developments that Ireland faces in the years ahead, with the number of people over the age of 65 expected to reach 1.4 million by 2041';

'Across this same period, the number over the age of 80 is set to quadruple, from 128,000 in 2011 to some 480,000';

'The implications for public policy in areas such as housing, health and urban and rural planning are considerable. Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible';

'In terms of cost effectiveness, home care costs in Ireland are estimated to be consistently lower than hospitalisation';

'For many, living in adapted or specialist housing reduces reliance on health and social care services and can result in measurably improved health status and lower rates of hospital admissions, while also contributing to a greater sense of wellbeing';

'There is, therefore, a requirement for a range of housing choices and options for older people. In developing that aspect of this Action Plan, account has been taken of a number of strands of Age Friendly Ireland's work including'; and

'Older persons have specific housing requirements such as being in proximity to their family and social networks and the need for access to public and other essential services, recreation and amenities.'

It is contended that the proposed development accords with the Action Plan for Housing and Homelessness, specifically Pillar 2, as it will provide accommodation to the increasing population of elderly people.

7.3 Housing For All – A New Housing Plan for Ireland 2021

The *'Housing for All - A New Housing Plan for Ireland'* was published in September 2021 as part of the *'Our Shared Future'* programme for government. The Plan will ensure that a more sustainable housing system with a planning system that is fit for purpose is achieved which will create long-term vibrant

communities with the necessary supporting infrastructure. Pathway 2 of the Housing for All plan relates to 'Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion'. This pathway contains the following aim:

'Increasing the housing options available to older people to facilitate ageing in place, with dignity and independence'

The Plan notes that housing policy must address the needs of socially excluded members of society which includes addressing the *restricted options for older persons or people with a disability*. The plan commits to *'taking further action to address needs in these areas.'* Section 2.4.1 of the plan contains the following commentary:

'Under Housing for All, we will increase the housing options available to older people to facilitate ageing in place with dignity and independence, including policies and operational supports for older people considering right-sizing to smaller housing homes.'

It is submitted that the proposed development accords with the provisions of the Housing For All plan as it provides for a high quality nursing home and several independent living units for older people. This will allow for older people to live in a safe area among peers and approximate to required services and amenity spaces.

7.4 Sustainable Residential Development in Urban Areas Guidelines

The aim of the Sustainable Residential Development in Urban Areas Guidelines is to identify the primary principles and criteria important to the design of housing and to highlight specific design features, requirements and standards. The document makes reference to both infill and backland development and states that, *'infill developments and urban redevelopment projects should respect the character of the existing neighbourhood'*.

The Sustainable Residential Development in Urban Areas guidelines encourages higher residential densities for developments which are within walking distance (500m) of a bus stop with minimum densities of 50 units per hectare (subject to other design criteria and amenity standards).

The density of the proposed apartment units is c. 50 dwelling units per hectare which is appropriate in regard to proximity to Town/Village Centre range of amenities as well as public transport.

It is considered that the proposed development has had regard to the above guidelines. The proposal integrates well with the surrounding area and provides a high quality nursing home and independent living units for the elderly at a suitable density for the site.

7.5 National Standards for Residential Care Settings for Older People in Ireland (2016)

Under the provisions of the Health Act 2007, the Health Information and Quality Authority (HIQA) have been given the responsibility to develop standards, inspect and review health and social care services and support informed decisions on how services are delivered. HIQA aims to safeguard people and improve the safety and quality of health and social care services across its full range of functions. The guidance for such standards is provided under the National Quality Standards. On 1st July 2016, the National Quality Standards for Residential Care Settings for Older People in Ireland were adopted as a replacement to the preceding iterations. Standard 2.6 of the document outlines the physical design standards for residential care settings. The following is noted:

'the residential service is homely and accessible and provides adequate physical space to meet each resident's assessed needs.'

- *The living environment is designed to promote the independence of residents, and the residential service adheres to evidence-based practice and national legislation in achieving and promoting accessibility.*
- *The living environment is stimulating and provides opportunities for rest and recreation.*
- *Bedrooms are decorated in accordance with each resident's wishes. All bedrooms have appropriate furniture and secure storage for personal belongings that facilitates functional activity and promotes independence.*

- *Furnishings and facilities are homely and meet the needs and preferences of residents. Residents are facilitated to decorate their area of personal space with furnishings from home.*
- *The residential care setting is creatively designed in a manner that safely accommodates residents' mobility, audio and visual needs. The design and layout encourages and aids independence, including appropriate signage and use of colours.*
- *Access to appropriate and accessible indoor recreational areas is provided.*
- *The premises include safe, secure outdoor spaces which residents are supported in using and which provide positive sensory stimulation. Outdoor spaces are accessible to residents with disabilities, and include seating and facilities for recreation.*
- *The physical environment is kept in good structural and decorative repair, internally and externally. Clear records of major repairs, capital works and maintenance works are kept.*
- *The residential service is maintained to a high standard of hygiene and is adequately lit, heated and ventilated.*

It is considered that the propped nursing home and independent living units for the elderly have been guided by the above and will provide high standard accommodation for future elderly residents.

7.6 Regional Spatial and Economic Strategy for the Eastern and Midlands Region

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region (RSES) replaced the Regional Planning Guidelines (RPGs) in June 2019. The RSES supports the implementation of national government policies such as the National Planning Framework (NPF) and also sets the framework for local economic development and spatial planning in the Eastern and Midland Region, including Dublin.

The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions. The RSES promotes the consolidation and intensification of lands within the built-up area of Dublin City. The following regional policy objective is noted:

RPO 4.3 *Support the consolidation and re-intensification 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 co-ordinated with the delivery of key water infrastructure and public transport projects.*

The intensification of the Site to provide for a nursing home and independent living units for the elderly is considered to be in accordance with the Regional Spatial and Economic Strategy. The site is highly accessible by public transport and is within proximity to a large number of services and amenities.

7.7 South Dublin County Council Development Plan 2016-2022

The South Dublin Development Plan 2016-2022 is the statutory document that is relevant for the proposed development.

7.7.1 Zoning Objective

The Site is zoned Objective 'VC' in the South Dublin Development Plan 2016-2022 with the following objective:

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

The vision for lands subject to the 'VC' zoning objective is as follows:

'to strengthen the traditional villages of the County by improving the public realm, sustainable transport linkages, commercial viability and promoting tourism and heritage value.'

Further to the above, it is also noted that the Site is situated within lands of areas of archaeological potential.

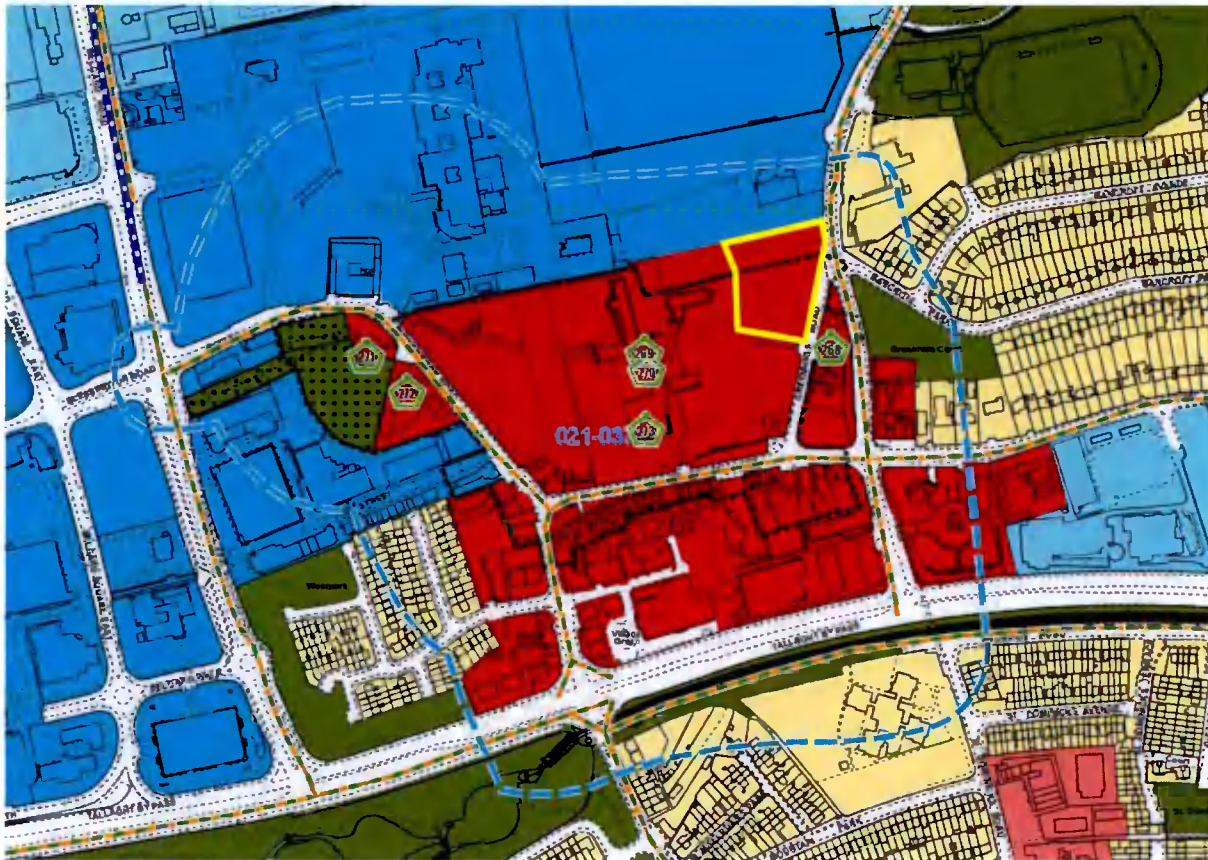


Figure 25.0 Zoning Map showing the Site (outlined in yellow) zoned objective 'VC' in the South Dublin Development Plan 2016-2022 and located within lands (blue outline) subject to the Record of Monuments and Places (021-03).

7.7.2 Housing for Older People

Section 2.1.2 of the South Dublin Development Plan 2016-2022 seeks to address the housing needs of older people within their communities, with the aim of providing a range of accommodation choices for people wishing to downsize and in turn to address the underutilisation of larger houses, particularly within more established areas. It is also Council policy to support the concept of independent and/or assisted living for older people. In this regard, the provision of purpose-built nursing home and independent living accommodation for the elderly is supported.

We note that the Census 2016 counted 22,762 persons residing in nursing homes, 3.7% of the population of people aged 65 and over enumerated on Census night. While the proportion of this age group living in nursing home accommodation decreased (from 4.1% in Census 2011), the actual number of people increased by 9.4%. Using the population projections published recently by the CSO, and referred to earlier, but maintaining the proportion of nursing home use at the 2016 level of 3.7%, the absolute number of people aged 65 and over in nursing homes will increase from 23,307 in 2016 (population projections figure), to 36,987 in 2031 – an increase of 58.6%. On this basis, it is considered that new nursing homes are in demand, as the Irish population ages in line with other European countries.

A report commissioned by Nursing Homes Ireland was conducted on the basis of interviews with nursing home residents, found that the reasons for admission were generally associated with ill-health, both mental and physical, commonly a hospital admission after a fall. The proposed development will provide a new nursing home of 106 no. beds and 60 no. independent living units for the elderly and, as such, is considered appropriate in the context of rising demand for such services.

H3 Objective 1 *To support housing that is designed for older people (including independent, semi-independent or nursing home accommodation) in residential and mixed use areas,*

at locations that are proximate to existing services and amenities including pedestrian paths, local shops, parks and public transport.

It is considered that the Site is ideally situated to accommodate the proposed development. The Site is located close to Tallaght village which provides several facilities and services that serve the local community. The Site is located within close proximity to two bus stops (Stops 2632 and 2603) which serve the 27 bus route from Jobstown to Clare hall, via the city centre.

H3 Objective 2 *To provide for the subdivision of large houses or amalgamation of smaller houses within established areas for the purpose of providing independent, semi-independent or nursing home accommodation. Such development should be subject to the car parking standards and the standards on dwelling subdivision as set out under Chapter 11 Implementation. A Traffic Impact Statement will be required in the case of major traffic generating developments or where it is considered that there would be a significant impact on the County's road network.*

The proposed development is considered to comply with the objectives outlined above, whilst the scale of development is considered appropriate to prevent any undue negative impacts on existing residential amenities. The proposed building has been designed to a high standard with finishes and materials that complement the existing character of the area, whilst the development provides for a large amount of useable, high-quality open space. This open space consists of landscaped walking loops which also connect to the nursing home making them highly accessible for residents. The landscaping details have been organised to ensure that the building sits appropriately within the surrounding landscape. In addition, it is noted that the site is situated within easy walking distance of Tallaght Village whereby connections to the city centre are provided via the Dublin Bus Service.

7.7.3 Car Parking Provision

Car parking standards provide a guide to the number of required off street parking spaces acceptable for new developments. Tables 11.23 and 11.24 of the South Dublin County Development Plan 2016-2022 set out the maximum parking rates for non-residential and residential development. Parking rates are divided into three categories: Zone 1; Zone 2 (non-residential); and Zone 3 (residential). The following figure demonstrates the maximum car parking spaces required to serve the proposal:

CATEGORY	LAND USE	ZONE 1	ZONE 2
Accommodation⁵	Hotel ⁷	1 per bedroom	0.5 per bedroom
	Nursing Home, Retirement Home	1 per 4 residents	1 per 8 residents
Civic, Community and Religious	Bank Community Centre Library	1 per 25 sqm GFA	1 per 50 sqm GFA
	Public Institution		
	Place of worship	1 per 6 seats	1 per 12 seats
Retail and retail Service	Funeral Home	1 per 20 sqm GFA	1 per 20 sqm GFA
	Café	1 per 15 sqm GFA	1 per 20 sqm GFA
	Restaurant		
	Bar Club ¹⁰	1 per 30 sqm	1 per 40 sqm
	Retail Convenience	1 per 15 sqm	1 per 25 sqm
	Retail Comparison	1 per 25 sqm	1 per 35 sqm

Figure 26.0 Table indicating maximum car parking spaces for non-residential uses.

The proposed development comprises a 106 bed nursing home; a pharmacy (68sq.m); and 60 no. independent living units.

The Site is within the Zone 2 parking standard due to its proximity to the village centre and its zoning of VC. The proposal provides for a total of 30 no. car parking spaces in addition to a minibus and ambulance

set down space. This quantum of car parking is considered suitable given the nature of the development which will provide a nursing home and accommodation for elderly people.

Additionally, the quantum of car parking was discussed at Pre-Planning stage with the Roads Department of South Dublin County Council who advised that that 30 no. proposed parking spaces would be sufficient for the development given the communal layout arrangement and usage. It is also noted that reduced mobility parking bays are provided as well as facilities for electric vehicle charging.

Parking for vehicles is provided in communal bays/groups central to the development within easy access to all of the building's entrances and are defined using permeable paving contrasting with adjacent pedestrian walkways. Each bay is further defined using coloured paving blocks. The layout accommodates 30 spaces situated to suit the individual uses inclusive of disabled spaces and EV charging points. The design creates an informal layout with parking areas integrated within the overall hard and soft landscape design so as not to overwhelm the overall appearance of the development.

As illustrated above, the proposed development is compliant with the car parking standards as set out in the South Dublin Development Plan 2016-2022.

7.7.4 Cycle Parking

Table 11.22 of the South Dublin County Development Plan 2016-2022 sets out Minimum Bicycle Parking rates for all new development in the County. Bicycle parking rates are divided into two main categories:

- Long Term: These are to be designed for use by residents and employees. Such spaces should be located in a secure area that is not freely accessible to the general public.
- Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.

Development Element	Cycle Parking Minimum	Quantum	Minimum Provision	Proposed Provision
Long-Term Cycle Parking Spaces				
Nursing Home	1 space per 5 staff	30 staff	6 spaces	6 spaces
Independent Living Apts ⁸	1 space per 5 apartments	60 apartments	12 spaces	22 spaces
Pharmacy ⁹	1 space per 5 staff	4 staff	1 space	1 space
Short Stay (Visitor) Cycle Parking Spaces				
Nursing Home	1 space per 10 residents	106 residents	11 spaces	11 spaces
Independent Living Apts	1 space per 10 apartments	60 apartments	6 spaces	10 spaces
Pharmacy	1 space per 50m ² GFA	68m ² GFA	1 space	2 spaces
Combined Cycle Parking Provision				
TOTALS			37 spaces	52 spaces

Figure 27.0 Extract from the Traffic and Transport Report prepared by CS Consulting which demonstrates the proposed bicycle parking spaces.

The proposed cycle parking and storage is provided under cover and securely at ground floor within each of the Independent Living Unit blocks and will be accessible internally and externally for security and convenience. 21 no. cycle spaces are provided overall with an additional 6 spaces for visitors. These cycle stores have storage space within for cycle equipment (helmets, pumps, lights etc) and will be fitted with charging points for electric cycles.

The Nursing Home will be provided with cycle parking areas adjacent to the entrances, by the pharmacy comprising 2 no. spaces and by the nursing home comprising 6 no. spaces).

Short term cycle parking is provided via lockable racks positioned adjacent to the entrance points of each of the various building uses for convenience and to ensure overlooking by building occupants for security. Ducting for charging points for electric cycles will be provided at each rack

7.7.5 Open Space

The provision of open space that is appropriately designed, properly located and well maintained is a key element of high quality residential environments. Open space should have active and passive recreational value and should enhance the identity and amenity of an area. Refer to also policies and objectives set out under Section 3.13 and 8.3 of the South Dublin County Council Development Plan 2016-2022.

Housing Policy 12 *It is the policy of the Council to ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provides for active and passive recreation and enhances the visual character, identity and amenity of the area.*

H12 Objective 1 *To ensure that public open space in new residential developments complies with the quantitative standards set out in Chapter 11 Implementation and the qualitative standards set out in Chapter 11 and Chapter 4 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009), together with the design criteria illustrated under the Urban Design Manual – A Best Practice Guide, DEHLG (2009).*

H12 Objective 2 *To ensure that there is a clear definition between public, semi-private and private open space at a local and district level and that all such open spaces benefit from passive surveillance from nearby residential development.*

With regard to Public and Communal Open Spaces, the development proposes a large quantum of public open space throughout the site. Open space will be provided in a series of communal areas and secure amenity in the north-western, north-eastern and southern parts of the site. The open space in the southern area is a dedicated amenity for residents of the Independent Living Units whilst the Open Space in the north-eastern area is a dedicated and secure external amenity for the Nursing Home. The open space in the north western area is a communal public space shared by all residents and an important social space which integrates the retained category A trees.

Open spaces have been provided under 4 no. distinct areas. Open space area 1 comprises 2,309sq.m and is located to the northeast of the development site; Open space area 2 comprises 1,032sq.m and is located to the northwest of the development site; Open space area 3 comprises 488sq.m and is located to the south of the development site; and Open space area 4 comprises 1,190sq.m and is located throughout the development site. A total of 5,019 has been provided through the scheme.

All of the open space areas will enjoy good sunlight throughout the day whilst being fully and easily accessible and overlooked by all residents and act as focal points within the proposed development linked via a looped pathway.

In relation to private open space, the proposed independent elderly living units are afforded with an area of private open space of approximately 6sq.m. These private open space areas either meet or exceed the minimum requirements.

7.8 Tallaght Town Centre Local Area Plan 2020

The Site is included within the boundary of the Tallaght Town Local Area Plan which was adopted on 20th July 2020. The local area plan notes that the Site is located within The Village urban neighbourhood and has the Zoning Objective of VC – *to protect, improve and provide for the future development of Village Centres*. This plan seeks to strengthen Tallaght's position as a highly liveable, well designed, quality urban environment that is home to diverse and integrated communities, where people feel connected and there is a distinctive sense of place.

The following objectives pertaining to development at the Site are noted:

Objective RE 9 *It is an objective of the LAP to facilitate the delivery of elderly housing accommodation, stepped down care accommodation and other forms of assisted living accommodation which can benefit from close proximity to existing services and facilities.*

The proposed development will provide for a nursing home and independent living units for the elderly which is in accordance with the above.

Objective RE 10 *It is an objective of the LAP to encourage and facilitate the delivery of Lifetime Adaptable Housing.*

It is considered that the proposed independent living units accord with the above.

Objective VL 5 *Facilitate green infrastructure along public streets.*

The proposed development provides new and more appropriate tree planting along Old Greenhills Road which will be visually attractive, retain feature of height and improve biodiversity and habitat as well as afford greater protection to historic stone wall. This is considered to accord with the above.

Objective VL 6 *Protect and enhance setting of Protected structures and qualities of the ACA.*

The proposed development is located within unused lands bounded by mature trees and is visually separate from the Priory buildings which are Protected Structures. Trees at the southern and western boundaries will be retained as well as Category A & B trees within the site. Heights of proposed buildings are similar to those closest to the Priory buildings with building design overall such to avoid over dominance of new buildings. Existing views towards Protected Structure(s) are not interrupted by new buildings. Material selection for new buildings chosen to complement Protected Structure, be of high quality and durable. Proposed site layout continues the existing campus style layout of the Priory. Existing stone boundary wall to be repaired with one opening created for access, the design of which will be subservient to the existing Priory carpark entrance. More appropriate tree planting along Old Greenhills Road to be provided than that existing. A full and detailed Conservation Plan has been submitted under separate cover.

Objective VL 8 *Protect the character and integrity of the Priory, including its parkland setting and provide for greater public access and usage.*

The proposed development is located on lands formerly used for agriculture and partially as gardens for the former Tallaght House and the Site is set apart from the main Priory lands. The formal landscape areas associated with (and to the west and north of) the Priory are not affected by the proposed development. The location of the proposed new buildings does not adversely affect the character and setting of the Priory and does not interfere with any public views of the Priory.

Objective VL 9 *Protect and preserve Heronry located on Priory lands and extending into TUD.*

An ecological assessment of the proposed development site has been carried out. The report states that the Heronry is too far from the construction zone for any direct impacts to occur. Indirect impacts, from disturbance effects (noise and movement of people and machines) are unlikely as there is no direct visual path between the Heronry and the site.

Despite this, it is an objective of the landscape design for the development site to entice heron nesting within the site lands. To achieve this objective, 3 no. heron nest platforms have been located in the north

western site area. Coupled with the heron nest platforms a number of bat and bird boxes have been proposed across the site. Both the heron platforms and the bat, bird boxes are illustrated on the landscape drawings LP-01-PP, prepared by Doyle + O'Troithigh

Objective VL 10 *Provide for some residential or mixed-use development on lands to the east of the Priory, subject to the above key objectives.*

The proposed development proposes a nursing home and independent living units for the elderly. These uses are both residential comply with the above objective.

Objective VL 11 *Any proposals for the future significant development of the Priory or St Maelruans shall be accompanied by a detailed conservation plan which will assess the impact of any development and how it will contribute to the conservation of historically significant structures and landscape elements.*

An Architectural Heritage Impact Assessment has been prepared to inform the design process for the new development. An Archaeological Assessment has also been completed. The planning application for the development is accompanied by a detailed conservation plan.

7.8.1 Plot Ratio

Section 2.6.1 of the Tallaght Local Area Plan refers to plot ratio. The local area plan provides an indicative plot ratio of 0.75 to 1.0 for the Site. The local area plan provides some flexibility in the allowable plot ratios and allows increased plot ratios under several conditions, such as the following:

'Provision of community and/or cultural amenities that will significantly contribute to the social infrastructure in the area'

The proposed development results in a plot ratio of approximately 1.08 on the Site. It is considered that the higher plot ratio is permissible as the proposal provides for significant community benefit through the provision of high-quality residential care for the elderly.

7.8.2 Building Height and Built Form

Section 2.6.2 of the Tallaght Local Area Plan refers to Height and Built Form. The local area plan notes that studies indicate that developments of between four and six floors, in medium and high intensity urban contexts, are optimal for construction, running costs and residential amenity. In general terms, the height strategy provides for the following:

- *Building height and scale is greatest in the Centre, in close proximity to Luas stops and along arterial and primary route frontages (up to 6–7 storeys residential, +1 recessed and up to 5–6 storeys non-residential, +1 recessed).*
- *Building height and scale on secondary routes/frontages is lesser but still within an urban scale, (4–6 storeys residential, 3–5 storeys non-residential).*
- *Building Height (3-4 storeys) is lower along tertiary routes, within the network of secondary streets)*

The proposed development has been reduced in height in response to the refusal of the previous planning application. The nursing home has been reduced to 4 stories. The independent living apartments range between 4-storey and 5-storey. The proposed heights respect the existing surrounds while ensuring a sustainable living environment.

7.8.3 Public Realm and Open Space

The Tallaght Local Area Plan is reinforced by a strong vision for the public realm and open space of the Plan area. This ensures the policies and objectives of the Plan are supported with quality public spaces. The Plan details an Urban Framework which supports the emergence of sustainable residential neighbourhoods underpinned with quality public realm.

The proposed development provides a significant quantum of open spaces throughout the scheme. The public realm will also be of a very high quality for residents, workers and visitors of the scheme. Open spaces will be interconnected to provide for a looped walk and winding footpaths around the nursing

home village. The pathway will also provide for a series of curving seats with arm and back rests to allow for resting and meeting points. The width of the pathway varies throughout the site but is sufficiently wide to allow ease of movement and passing by residents of all abilities. Viewpoints will be provided from various points within the site to the main Priory building, creating a sense of place.

7.8.4 Residential and Community

Section 5.0 of the Local Area Plan refers to Residential and Community. This section notes that the area has seen a rapid growth in population over the past ten years with a significant reduction in residential vacancy. There is a strong sense of community in Tallaght. A strong sense of community, coupled with high quality residential development and social infrastructure, will continue to strengthen Tallaght's appeal as being a positive and vibrant place to live and work. The plan notes the importance for South Dublin County Council to continue to strengthen Tallaght's appeal in terms of residential and community facilities.

In relation to Elderly Housing and Care, the following objectives of the Tallaght Local Area Plan are noted:

Obj. RE 9 *To facilitate the delivery of elderly housing accommodation, stepped-down care accommodation and other forms of assisted living accommodation which can benefit from close proximity to existing services and facilities*

Obj. RE 10 *To encourage and facilitate the delivery of Lifetime Adaptable Housing*

The scheme will provide for a nursing home in addition to housing for older people. This has been informed by the local area plan and, accordingly, the proposal is considered to be consistent with the aforementioned objectives.

Section 5.3 of the Local Area Plan refers to Community Facilities and notes the following objective:

Obj. CF 1 *To promote Tallaght as the priority location for regional level community and social infrastructure in the County. In addition, South Dublin County Council will facilitate the expansion and enhancement of existing community facilities and to facilitate the provision of a range of new community facilities in tandem with population growth to meet the needs of future residents of Tallaght*

The proposal will provide for community infrastructure which is anticipated to be predominantly utilised by future residents of the nursing home and housing units. This is considered to accord with the above.

7.8.5 Architectural Conservation

Section 6.2 of the local area plan relates to architectural conservation. The subject site is associated with a protected structure, Saint Mary's Priory and is also contained within an architectural conservation area. It is submitted that the proposed development has been informed by the guidance contained within the local area plan, in addition to local and national guidance provided by South Dublin County Council and the Section 28 Ministerial Guidelines. The development is a sensitive addition which does not affect the character of the protected structure. Whilst a small segment of the wall is proposed for removal, any material will be reused throughout the landscaped areas of the site.

7.8.6 Appendix 4 – Social Infrastructure Audit

Appendix 4 of the Tallaght Local Area Plan comprises a Social Infrastructure Audit (SIA). The stated function of which is *'to examine and analyse the availability and capacity of existing social infrastructure facilities in Tallaght, and to determine future requirements, and make recommendations based on anticipated settlement growth'*. The SIA notably states that *'there are no nursing homes within the LAP lands'*

The SIA provides a breakdown of the projected population and notes that Tallaght Town Centre has a projection of c.34,000 people by 2040. Approximately 7,208 of the projected population will be aged 65+ and a total of 1,417 of those people could require long-term residential care beds, such as those provided by nursing homes or alternatives such as community nursing unit facilities.

The SIA continues to note that the HSE predicts that by 2036, 8.5 rehabilitation/assessment/ respite beds per 1,000 65+ population will be required, which would amount to approx. 61 short term residential care beds being required by residents of Tallaght town centre. The audit notes that the provision of health facilities and GP surgeries are a matter for the HSE, however the LAP endeavours to facilitate the provision of such facilities in development proposals in consultation with the HSE in tandem with growing population.

It is submitted that the proposed development is consistent with the above. The proposal will provide the first nursing home within the LAP lands. The proposal will also provide required dwellings for older people.

7.8.7 Appendix 5 – Context and Plan Making Process

Appendix 5 of the Tallaght Local Area Plan sets out the Context and Plan Making Process. Section A5.5. of the appendix relates to Key Issues and Opportunities informing the development of Tallaght. This section states that a number of key opportunities were identified which informed the emerging Strategic Framework. One of the identifies opportunities is considered relevant to the proposed development, and reads as follows:

- *Maximising Tallaght's Assets*

The local area plan notes the challenge of building on the existing assets within Tallaght. It is submitted that the proposed development will result in a more beneficial use of lands within the village centre. The scheme will provide much needed living accommodation for older people in the form of a nursing home and independent dwellings. The residents will be afforded with a very high standard of amenity arising from the development and the wider Tallaght area.

8.0 Services

For full details on the proposed surface water, foul drainage and water supply, please refer to the Engineering Services Report and Drawings prepared by Cronin Sutton Consulting Engineers. A summary has been provided below.

8.1 Foul Water

The Engineering Services Report notes that, presently, the existing public drainage network is located in Greenhills Road. South Dublin County Council's drainage records indicate a 225mm diameter foul sewer flowing west to east. Please refer to Appendix A of the Engineering Services Report prepared by CS Consulting Engineers for South Dublin County Councils drainage records. The Engineering Report proposes that all foul effluent generated from the proposed development from the upper floors shall be collected in separate foul pipes and flow under gravity, via the existing 225mm diameter spur, to the existing 225mm diameter foul sewer in Bancroft Park.

8.2 Storm Water

In accordance with the requirements of SDCC Drainage Division all new developments are to incorporate the principles of Sustainable Urban Drainage Systems, (SuDs). The SuDs principles require a two-fold approach to address stormwater management on new developments. The proposed stormwater drainage arrangements are outlined in the Engineering Services Report.

8.3 Water Supply

Records obtained from Irish Water indicate public watermains adjacent to the development site on Greenhills Road. It is proposed to make the connection into the existing watermain on Greenhill Road. This connection shall be 100mm pipework with bulk water meters to Irish Water specifications.

9.0 Screening for Appropriate Assessment

Having regard to the nature and scale of the proposed development within a serviced area and separation distance to the nearest European site, it is considered that the proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on the conservation objectives of any European site. In support of the planning application, Openfield

Ecological Services were appointed to prepare a Screening Report for Appropriate Assessment, which is contained under separate cover. The report concludes that

'On the basis of the screening exercise carried out above, it can be concluded that the possibility of any significant impacts on any European Sites, whether arising from the project itself or in combination with other plans and projects, can be excluded beyond a reasonable scientific doubt on the basis of the best scientific knowledge available.'

Please refer to the Screening Report for Appropriate Assessment for further details.

10.0 Flood Risk Assessment

Following pre-planning discussions with South Dublin County Council on 19th November 2021, the Applicant commissioned the completion of a Flood Risk Assessment. This has been prepared by Cronin Sutton Engineers and contained under separate cover. In summary, the report concludes that the site has not flooded from past events and that the subject site is located outside of the 0.1% zone. Additionally, pluvial flooding has been assessed and the use of an attenuation tank, as proposed, will aid in increasing the capacity of the public surface water sewer adjacent to the site. The increased capacity will allow the public drainage system to deal with pluvial flows during extreme storm events. Finally, the risk of the site contributing to offsite flooding or the sites vulnerability to flooding from the public drainage network is mitigated by the installation of an attenuation tank to retain the storm volumes experienced on site during high intensity storm events.

11.0 Conclusion

It is considered that the proposal is consistent with the relevant planning policy framework, and in compliance with the relevant qualitative and quantitative standards, of the South Dublin Development Plan 2016–2022. The proposed development, comprises the construction of a 106 no. bed nursing home and 60 no. independent elderly living units, has been designed with a particular emphasis on the locational context of the existing environment. The layout and proposed design of the accessway into the Site has been carefully considered and provides safe access. The layout and design of the proposed development seeks to contribute positively to the established character of the area while maintaining the existing residential amenity of adjoining residents, and providing much needed housing in a sustainable location.

The revised development has been informed by the previous refusal and subsequent pre-planning guidance. The scheme is now considered to overcome and address each of the previous refusal reasons and concerns. The nursing home, independent living units and landscaping throughout will result in a village within a village-style area which caters to the specific requirements of older people. The design and layout of the scheme has been evolved to ensure no adverse impact to the existing buildings occurs whilst also ensuring that the scheme integrates with the buildings and lands. Though a portion of the wall is to be removed to accommodate the development, the developer will reuse the material within the landscapes and seating areas of the site, thereby ensuring that all historic material remains within the Priory grounds.

It is considered that the proposed development is in accordance with the proper planning and sustainable development of the area and as such we request that planning permission be granted in this instance.



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Director
for HPDC Ltd.