

South Dublin County Council
An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
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PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Decision Order Number: 0429	Date of Decision: 04-Apr-2022
Register Reference: SD22A/0035	Registration Date: 07-Feb-2022

Applicant: St. Marys Medical (Tallaght) Ltd.

Development: (a) Construction of a 4 storey nursing home building consisting of: (i) 106 bedrooms (with ensuite); (ii) associated residents welfare facilities; (iii) administration areas and staff facilities; (iv) multi-function space and pharmacy proposed at ground level; (b) construction of 60 one bed independent living units in 3 blocks as follows: (1) Block A, a 4 storey building comprising 11 one-bed units; (2) Block B, a part 4/part 5 storey building comprising 35 one-bed units; and (3) Block C, a 5 storey building comprising 14 one-bed unit. Each unit will be provided with a 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 car park spaces (including 3 limited mobility parking spaces; 3 EV parking and 1 car sharing spaces); and 52 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 wells and railings to southern and western boundaries), and ESB Substation SuDs drainage, road infrastructure and all ancillary site works necessary to facilitate the development.

Location: Lands within St Marys Priory, Old Greenhills Road, Tallaght, Dublin 24

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 07-Feb-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. The SDCC Architectural Conservation Officer has recommended refusal. The applicant is requested to address the issues raised by the Planning Authority in relation to Conservation and to show in their overall response how these issues have been addressed.
 - (1) Concerns remain in that the character of the Protected Structures will be significantly affected by the proposed Nursing Home and Independent Living Accommodation blocks 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 consequences of the proposed development may result in a diminished quality of character, which fails to address and adhere to existing policies for development within the curtilage of a Protected Structure or New development within or in close proximity to an ACA in line with SDCC County Development Plan (2016-2022) and the Tallaght Local Area Plan 2020.
 - (2) It is considered that the proposed design with the use of contemporary materials and building elements found within the existing building stocks tries to address the issue of a contemporary design within a historic site. However, given that the issue of building height, mass and dense form of the proposed blocks, the overall impact 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. A lower scale development providing different levels and design styles would allow for a high quality unique development within the curtilage of a Protected Structure, historical setting and within such close proximity to a village centre.
 - (3) It is felt that given the location of the site adjoining the Priory Complex and in such proximity to the village centre any new development at this location should provide an identifiable contemporary addition, adding the architectural interest to the adjoining Priory and Tallaght Village. It should be noted that Block A, Block B and Block C are the same overall design, which does not allow for variation and unique building types that can add to the character and identity of the site.
 - (4) It is considered that the proposed blocks are dense and require redesign to allow a more subtle and mixed architectural type to reflect a more village/community feel development. There is reference to a "Village Hub" with regard to the location and connection of the associated facilities with the Nursing Home and Independent Living for Older People, however this is not reflected in the overall design of the proposed development. The proposed use on the site is ideal in terms of its location to Tallaght Village and other facilities but the design and layout of the proposed Nursing Home and in particular, the Independent Living Accommodation needs to be more cognisant of the proposed type of development in providing a development that is more suited to this use.
 - (5) It is proposed to insert a new entrance within the existing original boundary wall of the Priory. It should be noted that in order to provide a new entrance and justify the removal of an original boundary feature a scheme that addressed the concerns and allows for a development which is

sensitive to the site context and one that delivers a suitable type at this location is required. Currently this is not the case and therefore a compromise between allowing a section of the original boundary wall to be removed to facilitate the proposed development cannot be considered based on the current scheme. Allowing a new entrance at this location will only be considered when a proposed development is deemed to make a contribution to Tallaght Village and the adjoining Protected Structure site in providing for a visually attractive and smaller scale scheme and sustainable development.

2. Taken in isolation, the proposed intensity of development might be considered to be appropriate if the site was located along secondary frontage within the existing street network or a proposed new urban district (as with for instance, Cookstown). The proposed scheme is however located off the existing street network and on lands previously part of a local institution and within the curtilage of a protected structure and being a major site in the context of the village centre and ACA. As signalled in previous decisions and pre-planning guidance, the proposed plot ratio is excessive and taken in combination with the height, the overall intensity of development would contradict the following objectives of the Local Area Plan:

- Section 3.4 specification in relation to Building Height reads 'To respond to local context, particularly the Architectural Conservation Area.'

- VL6: Protect and enhance setting of protected structures and

- VL6: (Protect and enhance...) qualities of the ACA.

- VL8: Protect the character and integrity of the Priory, including its parkland setting, and

- VL8: Provide for greater public access and usage.

- VL10: Provide for some residential or mixed-use development on lands to the east of the Priory, subject to the above key objectives.

The proposed Old Greenhills Road access and permanent division of the Priory Grounds is considered to seriously detract from the character of the Priory and has only been considered by South Dublin County Council in the context of providing a social and community benefit at the site; however, policy which seeks to protect the setting of the protected structure, the ACA and the village centre, and the parkland setting of the grounds, and to promote public access to and use of these grounds, has not been set aside and remains a determining factor in any development of the site.

A lower impact scheme would dissipate the proposed development among smaller blocks, arranged around the proposed facilities to give what the ACO describes as a 'village hub' character to the scheme. The buildings are still considered to be bulky and monolithic, and laid out in such a fashion that detracts from the parkland setting of the site. The proposal detracts from the character of the site, surrounding area and ACA.

The applicant has shown a willingness to amend the design since the most recent refusal. The applicant is requested therefore to provide revised plans, following consultation with the Planning Authority and the SDCC Architectural Conservation Officer if necessary, by way of additional information.

3. The applicant is requested to provide an outline SuDs Strategy, which should match the Landscape Plan and Engineering drawings submitted (and revised as may be). Additional natural SuDS features shall be incorporated into the proposed drainage system for the development such as blue roofs, rain gardens, detention basins, filter drains, rills, swales, rainwater features etc. The strategy should include an outline layout and calculations to show that greenfield run-off rates from the site outside of

major weather events are to be maintained without the need for underground water storage. The applicant is advised to consult the SDCC Sustainable Drainage Design & Evaluation Guide 2022.

4. (a) The applicant has submitted limited surface water drainage plans for the proposed development. The applicant is requested to submit a detailed drawing showing existing and proposed surface water drainage layouts up to and including the point of connection to the public surface water sewer from proposed developments. The drawing shall include the location of all AJs, manholes, pipe size, material type and direction of flow. Maps of surface water drainage networks may be obtained, if available, for required locations in South Dublin County Council by emailing servicemaps@sdblincoco.ie.
 - (b) (i) The applicant is requested to submit a drawing and report to show how much surface water attenuation is provided in m³. The proposed attenuation calculation of 348m³ required is 30% undersized for a 1 in 30 year storm event and undersized by 42% for a 1 in 100 year storm event. Show how SAAR (Standard Annual Average Rainfall) was calculated.
 - (ii) Submit a revised report and drawing showing increased surface water attenuation provided. Attenuation shall be provided by SuDS (Sustainable Drainage System) as a first option and only where SuDS cannot provide enough attenuation should an arched type attenuation be considered.
 - (iii) The applicant should contact Water Services Department of South Dublin County Council prior to submission of revised report and drawing/s.
 - (c) The applicant is requested to submit a report and drawing to show the location of proposed development superimposed on a CFRAM OPW flood map. This is required to show what if any flood risk there is as a result of proposed development.
5. (a) The applicant is requested to:
 - (i) Submit a pre connection enquiry with Irish Water for proposed development.
 - (ii) Obtain a letter of confirmation of feasibility of proposed development and submit same to Water Services South Dublin County Council Planning Authority.
 - (iii) Submit a drawing showing the watermain layout of proposed development. Maps of the public watermain networks may be obtained, if available, for required locations in by emailing: datarequests@water.ie.
 - (b) The applicant is requested to:
 - (i) Submit a pre connection enquiry with Irish Water for proposed development.
 - (ii) Obtain a letter of confirmation of feasibility of proposed development and submit same to Water Services South Dublin County Council Planning Authority.
 - (iii) Submit a drawing showing the waste water layout of proposed development. Maps of the public wastewater networks may be obtained, if available, for required locations in by emailing: datarequests@water.ie.
6. The applicant is requested to confirm the no. of staff likely to be employed in the nursing home and to factor this into their assessment and design of car parking in the scheme. The number used for staff should reflect the maximum number of staff that will be present at the same time, including at times of shift changeovers.
 7. The applicant is requested to provide a Sunlight and Daylight Analysis showing assessment of the proposed units and open spaces and show assessment of sunlight hours, average daylight factor,

vertical sky component and no sky lines as appropriate.

8. The Ecological Assessment states that no bat survey has been conducted although mitigation measures are proposed. It is considered appropriate that the scheme is designed so as to minimise impact on bat activity and habitats (especially habitats).
 - (a) A bat survey should be undertaken to establish the presence of bats, the areas of the site used by bats and for what activities or roosting.
 - (b) Mitigation measures should be reflected in the scheme plans and if necessary details should be provided to show that the scheme can be safely lit.
9. Section 7.0 Climate Change: Mitigation of the LAP identifies the role of Tallaght in contributing to the response to climate change while integrating and implementing the SDCC Climate Change Action Plan (2019). Section 7.4.4 and 7.4.5 outline the requirements for new developments to have regard to the incorporation of space for future pipework/pipe run, energy centres or other infrastructure and future proofing to enable connection to a decentralised energy network.

The Tallaght District Heating Scheme is under construction and will serve the local area with cheaper heat using waste heat from nearby data centres. The applicant should consider how the design of this scheme can integrate with and use the district heating scheme.

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

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

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

Signed on behalf of South Dublin County Council

Register Reference: SD22A/0035

Date: 06-Apr-2022

Yours faithfully,


for **Senior Planner**