

**HUGHES**  
**PLANNING**  
& DEVELOPMENT CONSULTANTS

# STATEMENT OF CONSISTENCY & PLANNING REPORT

## Bancroft View SHD

Lands on Greenhills Road (north of Bancroft Park, south/west of Hibernian Industrial Estate and east of Airtown Road junction), Tallaght, Dublin 24

MAY 2022

SUBMITTED ON BEHALF OF:  
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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this statement of consistency and planning report on behalf of our client, Greenhills Living Limited, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development at Lands on Greenhills Road (north of Bancroft Park, south/west of Hibernian Industrial Estate and east of Airton Road junction), Tallaght, Dublin 24. The proposed development, as per the description contained within the statutory planning notices, provides for:

*'(i) demolition of existing substation and removal of existing advertisement structure on site; (ii) construction of a residential development of 197 no. apartments (79 no. one-bedroom, 105 no. two-bedroom and 13 no. three-bedroom) in 4 no. blocks (ranging in height from seven to eight storeys with eighth floor level roof garden) as follows:*

- *Block A containing 41 no. apartments (6 no. one bedroom, 34 no. two bedroom and 1 no. three-bedroom) and measuring eight storeys in height (with eighth floor roof garden);*
- *Block B containing 79 no. apartments (33 no. one bedroom, 34 no. two bedroom and 12 no. three bedroom) and measuring eight storeys in height;*
- *Block C containing 42 no. apartments (24 no. one bedroom and 18 no. two bedroom) and measuring seven storeys in height; and,*
- *Block D containing 35 no. apartments (16 no. one bedroom and 19 no. two bedroom) and measuring seven storeys in height.*

*(iii) all apartments will have direct access to an area of private amenity space, in the form of a balcony, and will have shared access to internal communal amenities including 2 no. resident lounges (114.7sq.m), gym (98sq.m) external communal amenity space (1,490.8sq.m) and public open space (1,667sq.m); (iv) provision of 78 no. vehicular parking spaces (including 3 no. car-share parking spaces, 4 no. mobility parking spaces, and 8 no. electric vehicle parking spaces), 4 no. set-down vehicular parking spaces (including 1 no. mobility parking space) and 448 no. bicycle parking spaces (including 100 no. visitor parking spaces) at ground floor/ground level accessible via new vehicular entrance gate off access road off Greenhills Road; (v) provision of 4 no. commercial units (871.5sq.m total) and 1 no. childcare facility (329.7sq.m) with associated external amenity space (168.8sq.m) located at ground floor level; and, (vi) all ancillary works including public realm/footpath improvements, landscaping, boundary treatments, internal footpaths/access roadways, bin storage, foul and surface water drainage, green roofs, removable solar panels, ESB substation and all site services, site infrastructure and associated site development works necessary to facilitate the development.'*

The purpose of this report is to provide background information on the site, a description of the proposal, the planning rationale and justification for the proposal and the required information set out in the Strategic Housing Development Application Form. This report has been prepared in accordance with the requirements of the Planning and Development (Strategic Housing Development) Regulations 2017 and pursuant to the requirement under Section 8(1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended) (the "2016 Act").

This report also has regard to the provisions of the South Dublin Development Plan 2016-2022 and the feedback received from An Bord Pleanála and South Dublin County Council during pre-planning consultations. This report should be read in conjunction with the enclosed documentation prepared by the following design team members:

<b><u>Design Team Member</u></b>	<b><u>Documentation Provided</u></b>
C + W O'Brien Architects FDA Consulting	Architectural Drawing Pack & Associated Documents Engineering Services Report, Associated Drawings, Flood Risk Assessment, Outline Construction Management Plan & Outline Construction and Demolition Waste Management Plan
Jennings O'Donovan EDC	Traffic and Transportation Assessment & Parking and Mobility Management Plan Energy Statement, Lighting Report & Associated Engineering/M&E Drawings
Cummane Stratton Reynolds Charlie McCorkell	Landscape Drawing Pack & Associated Design Statement Arborist Report & Associated Drawings
Openfield Ecology AWN Consulting	Appropriate Assessment, Ecological Survey & Bat Survey Article 299B Statement, Microclimate Report & Operational Waste Management Plan
3DDB	Computer Generated Images & Photomontage
Passive Dynamics Dwyer Jones	Daylight & Shadow Study Aeronautical Assessment
Cushman Wakefield Amplitude Acoustics	Servicing and Operations Management Plan Noise Impact Assessment



## 2.0 Site Location and Description

The subject application involves a parcel of land located at the intersection of Greenhills Road and Airtion Road, Tallaght, Dublin 24, and comprises an area of approximately 0.8 ha (1.98 acres). The site consists of a hard-standing surface to the north which is used for car parking and a greenfield to the south. The subject site is devoid of any built form with the exception of an existing ESB substation.



Figure 1.0 Aerial image illustrating the immediate locational context of the subject site (red outline).



Figure 2.0 Aerial image showing the wider locational context of the application site (red outline).



The site is located within an area comprising industrial land use immediately east and north, retail to the west and public open space area immediately south. The industrial land immediately north is known as the Hibernian Industrial Estate. The Hibernian Industrial Estate is expected to be the subject of extensive urban renewal in the coming years, with existing industrial buildings being replaced with higher density mixed use development. More broadly, Tallaght Village is situated south of the subject site and provides a range of retail and commercial services. Further services and amenities are provided in Tallaght Town Centre which is located south west of the subject site.

Technological University of Dublin – Tallaght is situated to the west of the subject site, approximately 550 metres west of the site. Tallaght Hospital is located a further 1.5 km west. The subject site is situated directly across from a bus stop served by Dublin Bus Route 27, which provides access to Dublin city centre as well as Tallaght Town Centre and the LUAS Red Line. Further bus routes to the city centre via the Tallaght Quality Bus Corridor are provided in Tallaght Village, which is a 10-minute walk to the south of the subject site. It is noted that Greenhills Road forms part of Bus Connects plans for the Tallaght area, improving access to Dublin city centre via bus.



Figure 3.0 Existing view of southern portion of subject site as viewed from Greenhills Road.



Figure 4.0 Existing view of northern portion of subject site as viewed from Greenhills Road.

### 3.0 Planning History of the Subject Site

This section provides a review of the planning history for the application site. A review of the South Dublin County Council and An Bord Pleanála planning registers revealed no planning applications relating specifically to the envelope involved in the subject proposal.

However, we note that a review of the South Dublin County Council planning register revealed that the subject sites formed part of a larger land parcel involved in the following planning application previously:

**Reg. Ref. SD04A/0186** Permission was granted by South Dublin County Council on 25<sup>th</sup> June 2004 for the amalgamation of previously approved Block C (Reg. Ref. S01A/0086) Leisure Centre into enlarged and modified Block B comprising two additional retail warehouse units and enlarged technology offices, change of use of previously approved Block C leisure use area (2080msq) to technology office use (412msq) and retail warehouse use (1668msq), additional new retail warehouse use to enlarged Block B (142msq), an additional 28 surface and 3 basement parking spaces, revisions to basement layout, elevations, signage and associated site works.

**Reg. Ref. SD07A/0622** Permission was granted by South Dublin County Council on 25<sup>th</sup> September 2007 for the construction of 11,649sq.m. own-door office space including lobbies, circulation and service areas and a 52sq.m. retail cafe kiosk in a two block development, one block of 4 storeys plus setback two-storey penthouse and one block of 3 storeys plus setback single storey penthouse, both blocks incorporating rooftop plant rooms and enclosures, 215 basement car parking spaces in a shared two-storey naturally ventilated basement incorporating mechanical plant and storage rooms, covered bicycle storage enclosure incorporating shower and toilet facilities, site hard and soft landscape works, street furniture and lighting, new access junction off Greenhills Road and internal access roads, set-down and ramps, two ESB sub-stations and switch room, waste management rooms and service yard, signage and associated site works.

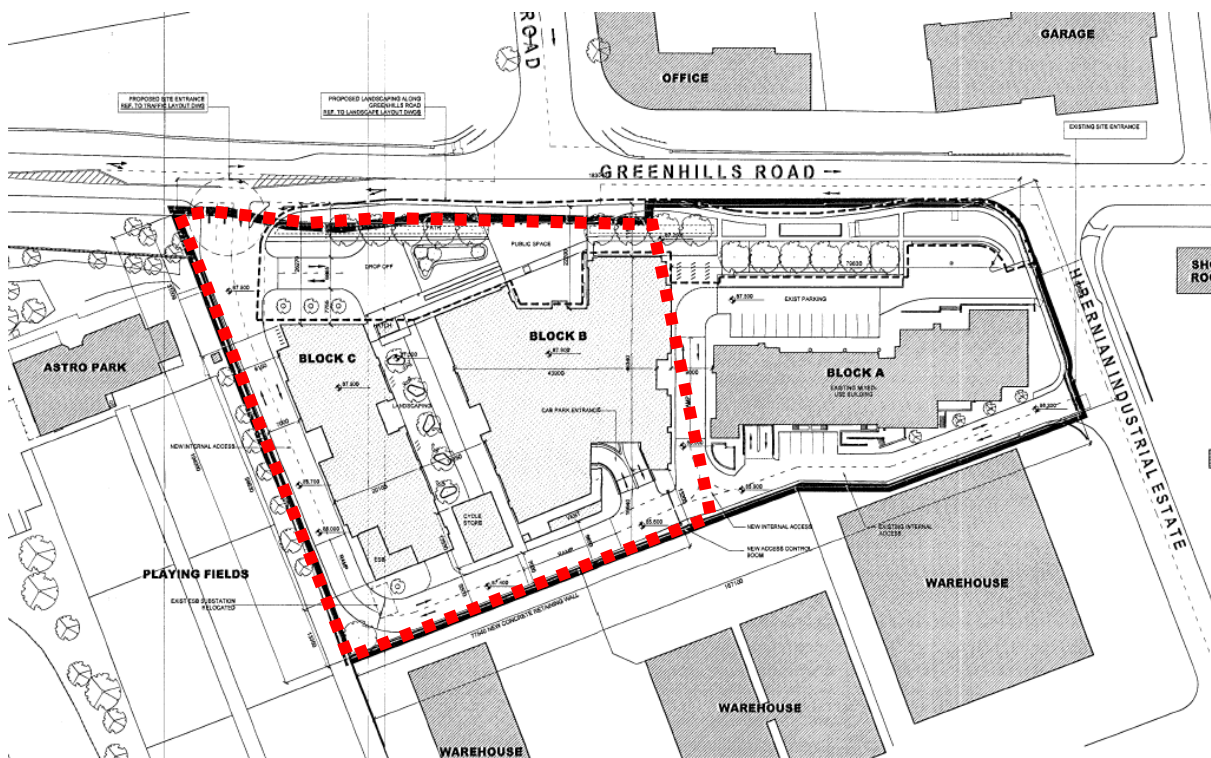


Figure 5.0 Site plan of development approved under Reg. Ref. SD07A/0622 (subject site outlined in red).



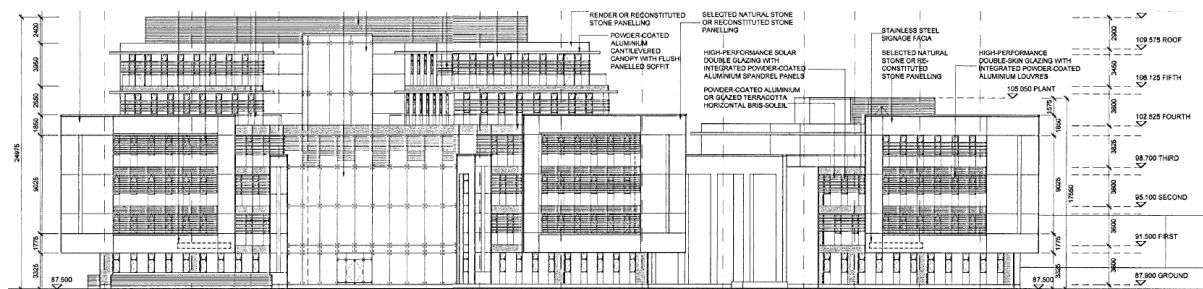


Figure 6.0 Western elevation of development approved under Reg. Ref. SD07A/0622.

#### 4.0 Relevant Planning History

A review of the South Dublin County Council and An Board Pleanála’s planning registers revealed the following applications which are considered to be of relevance in the context of forming a precedent for the subject proposal.

##### **Former Gallaher’s cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24**

**ABP Ref. ABP-306705-20** Permission was granted by An Board Pleanála on 16<sup>th</sup> June 2020 for a Strategic Housing Development at the Former Gallaher’s cigarette factory site at the junction of Airton Road & Greenhills Road, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involves: demolition of existing factory/warehouse buildings on site (total floor area c.10,076.8 sqm); construction of 502 no. apartments (comprising 197 no. 1-bed; 257 no. 2-bed; and 48 no. 3-bed units) within 6 no. blocks ranging in height from 4 to 8 storeys. All residential units provided with associated private balconies/terraces to the north/south/east/west elevations; provision of residential amenity facilities, 3 no. retail units, creche, and services/bin store areas (total non-residential floor area c.1,839 sq.m); a total of 202 no. car parking spaces (at basement and undercroft levels) and 584 no. bicycle parking spaces; vehicular/pedestrian/cyclist accesses from Greenhills Road and Airton Road. Provision of road improvements and pedestrian crossings; and all associated site development works and services provision.



Figure 7.0 Contextual elevation (Greenhills Road) approved under ABP Ref. ABP-306705-20.



Figure 8.0 Contextual elevation (Airton Road) approved under ABP Ref. ABP-306705-20.

This permission remains in force until 2025 and sets a precedent for the construction of suitably designed residential developments in this area. The subject site is located in the Industry/ Distribution zone in the Land Use Map in the Tallaght Town Centre Local Area Plan 2020-2026 and provides a precedent for residential development on lands zoned Industry/ Distribution. It is noted that the Inspector’s Report did not raise any concerns about the location of this development within these lands.

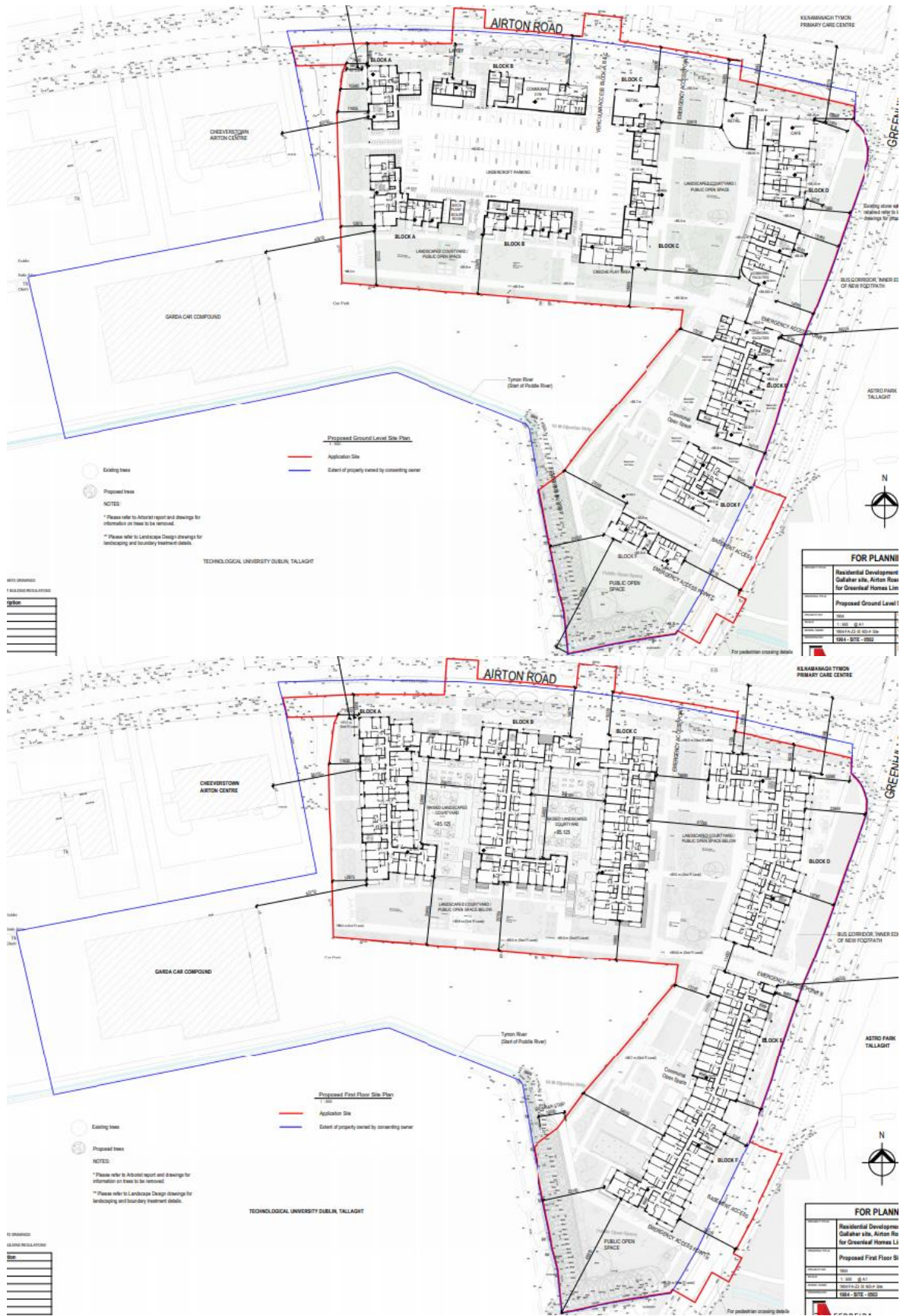


Figure 9.0 Ground floor layout plan (top) and first floor layout plan (bottom) of development approved under ABP Ref. ABP-306705-20.



### Site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24

**ABP Ref. ABP-305763-19** Permission was granted by An Board Pleanála on 20<sup>th</sup> February 2020 for a Strategic Housing Development on a site at the corner of Airton Road and Belgard Road, Tallaght, Dublin 24. In summary, the proposed Strategic Housing Development involves demolition of the existing industrial buildings on site (4,800sq.m) and the construction of 2 no. blocks comprising 328 no. apartments (93 no. 1 bed, 222 no. 2 bed and 13 no. 3 bed), ancillary residential support facilities and commercial floorspace measuring 31,147sq.m gross floor space above a single basement level measuring 5,861sq.m. The development also consists of the provision of a landscaped courtyard; public plaza at the corner of Airton and Belgard Road; pedestrian access from Airton Road to the Technological University campus; 184 no. car parking spaces at basement level including 14 no. club car spaces, 10 no. disabled parking spaces and 4 no. crèche parking spaces; 727 no. basement and surface bicycle parking spaces; 4 no. motorbike parking spaces; bin storage; boundary treatments; green roofs; hard and soft landscaping; plant; lighting; Vodafone cabin sub-station; ESB sub-stations, switch rooms and generators; and all other associated site works above and below ground.

This planning permission remains in force until 2025 and sets a precedent for the construction of suitably designed residential developments in this area. The subject site is located in the Industry/ Distribution zone in the Land Use Map in the Tallaght Town Centre Local Area Plan 2020-2026 and provides a precedent for residential development on lands zoned Industry/ Distribution.

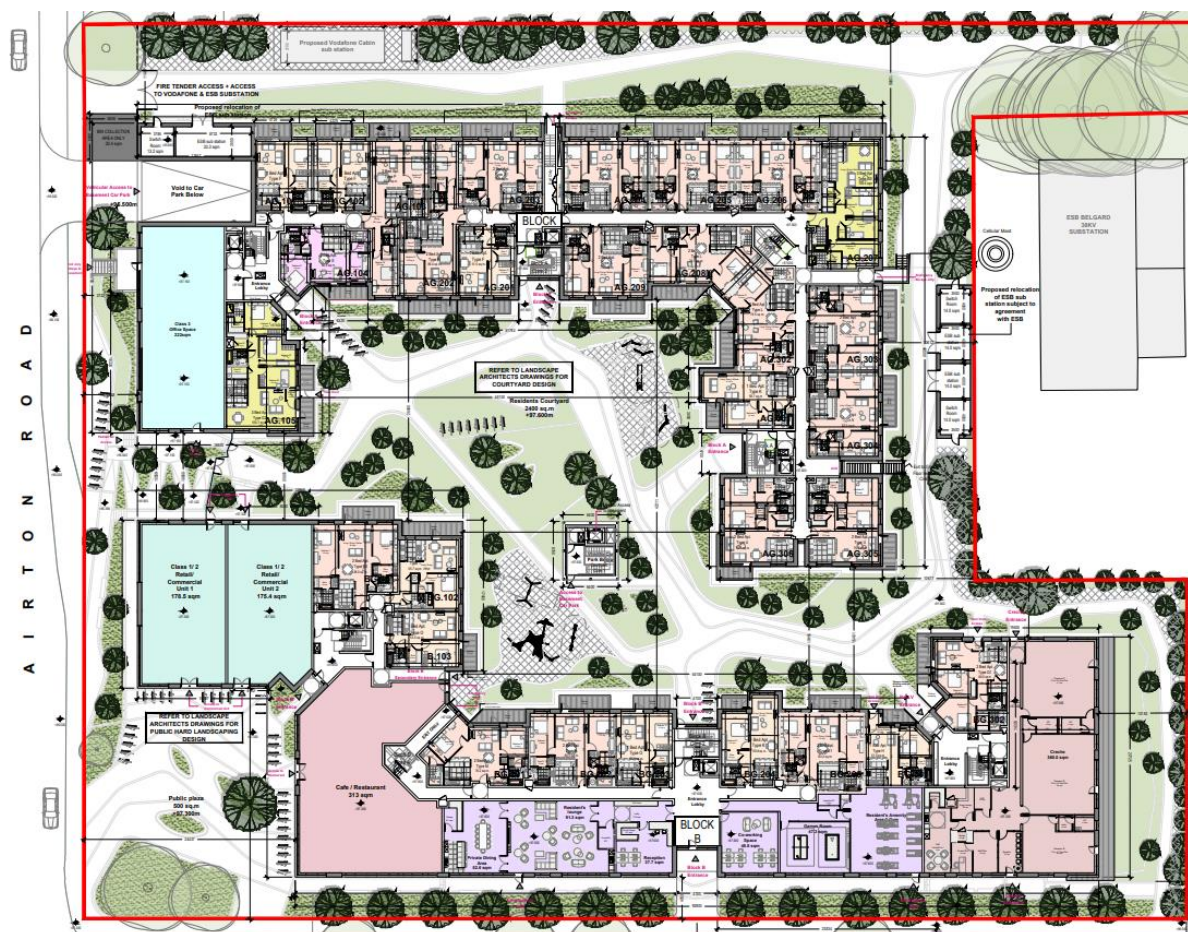


Figure 10.0 Ground floor layout plan approved under ABP Ref. ABP-305763-19





Figure 11.0 Northern elevation fronting Airton Road (top) and western elevation fronting BelgardRoad (bottom) elevation (fronting Belgard Road) of development approved under ABP Ref. ABP-305763-19

**Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24**

**ABP Ref. ABP-303306-18**

Permission was granted by An Bord Pleanála on 15<sup>th</sup> April 2019 for a Strategic Housing Development on lands at Belgard Gardens, Belgard Square North and Belgard Road, Tallaght, Dublin 24 (immediately east and south-east of the subject site). In summary, the proposed Strategic Housing Development involves demolition of all existing buildings and construction of a mixed use residential development (total GFA 55,180 sqm) comprising a new urban quarter and streets with 5 no. blocks to provide 438 no. apartment units (including live/work units) and associated amenity facilities, a 403 no. bedspace student accommodation scheme and associated amenity facilities, childcare facility (c.380 sqm), 6 no. retail / commercial units (c.632 sqm in total) and a security room (c.52 sqm). This will comprise phase I of the overall development of the c.7.2 ha. site and will be located on a net site area of 3.45 ha. (excluding proposed temporary car park at grade).



Figure 12.0 South contextual elevation of development proposed under An Bord Pleanála Case No. 303306

The development ranged from 4 to 10 storeys in height. In the Inspector’s Report, dated April 2019, it is noted that the site is suitable for the construction of 10 storeys. The Inspector states:

*‘In relation to urban design I consider that the site is wholly capable of establishing its own height. It addresses two public roads with suitable separation distances and in addition to the further phase of development, it effectively is a new urban quarter in the area given the size of the site. The higher elements of the proposed scheme are located at pivotal corners and junctions which create a presence for the development and way finding for the wider area. The design of the buildings which is discussed elsewhere provides that the height can be appropriately absorbed into the overall design and into the wider area. I consider therefore that in urban design terms the height strategy for the site is appropriate.’*

The Inspector's Report notes that the development was in contravention of the 2006 Tallaght Town Centre Local Area Plan before noting that the Board is precluded from granting permission for development that is considered to be a material contravention, except in four circumstances. These circumstances, outlined in Section 37(2)(b), are as follows: where development is of strategic or national importance; conflicting objectives in the development plan; regional planning guidelines or guidelines under Section 28 etc. or the pattern of development permissions granted in the area since the adoption of the development plan. The Inspector's Report notes that the development is a Strategic Housing Development Application and is therefore of significant or national importance. It is noted:

*'The current application has been lodged under the strategic housing legislation and the proposal is considered to be strategic in nature. Government policy as expressed within Rebuilding Ireland – The Government's Action Plan on Housing and Homelessness and the National Planning Framework – Ireland 2040 fully support and reinforce the need for urban infill residential development such as that proposed on sites in close proximity to quality public transport routes and within existing urban areas. This site would meet these requirements.'*

Based on the criteria set out in Section 37(2)(b), the Inspector made the following comment regarding increased height:

*'Furthermore, as the applicant points out in their statement, National Policy 13 and 35 refer to building height and car parking being based on performance criteria and increasing density through area or site based regeneration and increased building height. Therefore, it is clear that a significant and sustained increase in housing output and apartment type development is not only necessary but is Government Policy in order to meet the need for residential units. Therefore, I consider that the proposal herein would meet the requirements of Section 37(2)(b)(i).'*

In light of this decision by the Board, it is considered that the proposed development to which this report pertains, should be assessed similarly. It is submitted that the site is suitable to increased heights as described in this report and therefore should be granted permission.



Figure 13.0 Site layout plan of development approved under An Bord Pleanála Case No. 303306-18 including the second phase of development which is to follow.



## 5.0 Pre-Planning Consultations

### 5.1 S247 Pre-Planning Consultation with South Dublin County Council

We note that a Section 247 consultation meeting took place with the Planning Authority in relation to this application on 11<sup>th</sup> December 2020. The details of this meeting were as follows:

**Date:** 11<sup>th</sup> December 2020

**Attendees:** South Dublin County Council

Jim Johnston	Senior Executive Planner
Colm Maguire	Assistant Planner
John Hegarty	Senior Executive Engineer (Roads)
Brian Harkin	Senior Executive Engineer (Drainage)
Oisín Egan	Executive Parks Superintendent

#### Project Design Team

Anne McElliott	Hughes Planning and Development Consultants;
Christopher Browne	Hughes Planning and Development Consultants;
William Power	C+W O'Brien Architects;
Andrew Murphy	C+W O'Brien Architects;
Andy Fitzsimons	DFA Consulting Engineers
Maciej Skiba	CSR Landscape Architects

It is noted that the subject proposal, as presented for the initial S247 Pre-Planning Consultation, comprised the following:

- 3 no. blocks of 7-14 storey height
- 236 no. apartments (93 no. one-bedroom / 122 no. two-bedroom / 21 no. three-bedroom)
- 686.6sq.m of commercial floor space
- Creche facility

The main meeting notes/points of discussion from this meeting are noted below:

- The proposal should have regard for the fundamental vision and objectives of the Tallaght Town Centre Local Area Plan 2020-2026;
- Heights of 4-6 storeys were identified as acceptable and more appropriate at this location;
- The extent of residential accommodation was queried with the Planning Authority noting the predominant use of Greenhills Road by employment-based uses;
- Further details were also requested in relation to tenure and a request for greater provision of 3-bedroom units as part of the mix of residential units;
- The presented plot ratio was considered to be excessive at this location;
- The set-back of the proposed development from site boundaries was welcomed;
- The proposal should have regard for future Bus Connects works along Greenhills Road and clearly present any road improvements proposed;
- Details on intended pedestrian accesses should be clearly presented and rationale provided in relation to the vehicular entrance to the site from the north-eastern corner, the provision of emergency access was also queried;
- The quantum of vehicular parking was considered to be low whilst the Planning Authority noted that bicycle parking should be provided at a rate of 1 no. space per unit;
- Provision for electric vehicular parking spaces and mobility parking spaces was also queried;
- The use of SuDS measures was highlighted and instruction to maintain an 8m setback from an existing water pipe located along the southern boundary issued;
- In relation to building height, it was advised that the Air Corps be consulted to avoid potential conflicts whilst the impact of flood lighting from the nearby Astro pitches was also queried;
- It was advised that a tree survey be provided and trees be planted along the site boundaries;
- It was also advised to ensure the public spaces would be usable, that play equipment be provided and connection to Bancroft Park be facilitated.

The above feedback was duly considered in the revision of the development proposal for the purposes of the Tri-Partite Pre-Application Consultation with An Bord Pleanála as is discussed in Section 5.2, below.

## 5.2 Tri-Partite Pre-Application Consultation with An Bord Pleanála Ref. No. ABP-311753-22

The applicant, the Board and South Dublin County Council conducted a tri-partite pre-application consultation meeting on 14<sup>th</sup> January 2022, in accordance with Section 6(5) of the 2016 Act. The details of this meeting were as follows:

**Date:** 14<sup>th</sup> January 2022

**Attendees:** An Bord Pleanála

Stephen O'Sullivan	Assistant Director of Planning
Conor McGrath	Senior Planning Inspector
Hannah Cullen	Executive Officer

### South Dublin County Council

Eoin Burke	Senior Planner
Jim Johnston	Senior Executive Planner
Colm Maguire	Assistant Planner
Graham Murphy	Senior Executive Engineer
Brian Harkin	Senior Executive Engineer
Ronan Toft	Assistant Engineer
Fionnuala Collins	Assistant Parks Superintendent

### Project Design Team

Kevin Hughes	Hughes Planning & Development Consultants
Christopher Browne	Hughes Planning & Development Consultants
Maciej Skiba	Cunnane Stratton Reynolds Land Planning & Design
William Power	C+W O'Brien Architects
Andy Fitzsimons	FDA Consulting

It is noted that the subject proposal, as presented for the initial S247 Pre-Planning Consultation, comprised the following:

- 4 no. blocks of 7-14 storey height
- 236 no. apartments (94 no. one-bedroom / 122 no. two-bedroom / 20 no. three-bedroom)
- 435sq.m of commercial floor space
- Creche facility

This pre-planning meeting revolved around an agenda of 5 no. key points as follows:

1. *Land use and Development Principle, including compliance with the Tallaght Town Centre LAP*
2. *Design and Layout*
3. *Access and Transport*
4. *Drainage*
5. *Any Other Business*

We shall now provide a response to the key points raised, as presented in the Inspector's Report issued by An Bord Pleanála following the tripartite meeting, in respect of each of the above discussion points:

### Land use and Development Principle, including compliance with the Tallaght Town Centre LAP

#### An Bord Pleanála Comments

- Further clarity is required in relation to the tenure proposed in the scheme, whether for a BTR or BTS scheme. There will need to be consistency within the application documentation.



- The lands are subject to the Re-gen zoning. Clarity is required in relation to the intent of the urban function identified for this neighbourhood within the LAP.
- The applicant should ensure that application documentation refers to the final adopted LAP.

#### South Dublin County Council Comments

- The county development plan zones the lands as Regen. The more recent 2020 LAP (page 65) sets out the land use mix and the urban function and 5 key objectives for the Greenhills area, in particular GH1 – intensification of use to higher value communal and employment uses.
- In principle, residential use is not an issue however compliance with the objective will need to be further demonstrated at application stage.

It is herein confirmed, as per the statutory notices enclosed with this application, that the subject proposal provides for Build-To-Sell (BTS) residential units alongside the wider provision of commercial accommodation. The subject proposal has had due regard for the provisions of the Tallaght Town Centre Local Area Plan 2020-2026 and a response is provided to each of the 5 no. key objectives for the Greenhills Area in Section 7.2. of this report.

#### Design and Layout

##### An Bord Pleanála Comments

- Address PA concerns regarding height and density. A strong argument should be presented to over-ride the recently adopted LAP.
- Demonstrate further how the site fits in with the local area.
- Describe the design rationale for the public plaza / open space.
- Clarification in relation to the ownership of the Astro Park.
- Residential amenity, including internal amenity space, should be further detailed.
- Daylight/sunlight assessment should be complete and comprehensive, and detail fully areas of compliance and or non-compliance with relevant guidance.
- Clarification to be provided regarding the servicing of commercial units.

##### South Dublin County Council Comments

- The LAP was recently adopted and is based upon detailed design considerations.
- The development does not provide for significant public gain in order to avail of the additional height flexibility under the LAP.
- Mix use frontage, which is appropriate, should be designed to be useful and attractive.
- Details of servicing arrangement should be provided.

With regards to building height, it is considered that the location of the subject site in conjunction with the proposal's compliance with the development management criteria presented in the Urban Development and Building Height, Guidelines for Planning Authorities (2020) provides sufficient rationale for the subject proposal. With regards to the commercial accommodation, we would consider the design to be appropriate relative to the site's location and we note that the units can be adequately serviced via the proposed access arrangements.

The subject application is accompanied by various assessment to confirm no undue impact on existing/future amenities of both neighbouring sites and residents of the proposed scheme. The design of the proposed open space is discussed in the enclosed Architectural Design Statement and Landscape Design Statement, as prepared by C+W O'Brien Architects and Cunnane Stratton Reynolds respectively.

#### Access and Transport

##### An Bord Pleanála Comments

- There is a lack of detail in relation to the proposed northern access route and its capacity to serve the proposed development and existing adjoining development.
- Elaborate on how the scheme can be serviced and accessed, including the creche and commercial units.

- Confirm that the TTA has regard to road network modifications proposed under Bus Connects.
- Justification for the level of cycle parking provision is required, in line with national guidance.
- Ensure that cycle parking provision is accessible and that required operational clearances are achieved.

#### South Dublin County Council Comments

- The width and design of the existing northern access road does not appear amenable to accommodating access to the proposed development.
- The Bus Connects project proposes to alter the junction with Greenhills Road.
- The original assessment of parking was based on a BTS scheme. Parking still seems short based on the proposed tenure split. Rationale to be submitted along with any mitigation measures proposed.

We would ask the Board to have due regard for the suite of documents prepared by Jennings O'Donovan, as are enclosed with this application, in respect of access and transport details. It is appropriately demonstrated that the proposed access route, via the Hibernian Industrial Estate, will continue to operate within capacity until 2038 and, as such, can accommodate the extent of vehicular parking proposed under the subject application and associated vehicular movements arising from deliveries, servicing and creche drop-off. The Traffic & Transport Assessment has had regard for the road network modifications proposed under Bus Connects.

With regards to cycle parking provision, we note that the development has been revised to ensure compliance with the provisions of the Sustainable Urban Housing: Design Standards for New Apartments (2020) with 1 no. bicycle parking space provided per bedroom and per 2 no. residential units. The provided bicycle parking is easily accessible at ground level for the benefit of future residents. With regards to vehicular parking provision, the extent of parking provided has also been guided by the provisions of the above-mentioned Apartment Guidelines which allow for a reduction in vehicular parking relative to the site's location and proximity to public transport services. It is considered that the achieved quantum, in conjunction with the provision of car-share spaces represents an appropriate extent of vehicular parking at this location.

#### Drainage

##### An Bord Pleanála Comments

- Address the constraints in relation to the foul drainage network identified by Irish Water.

##### South Dublin County Council Comments

- Report to be taken as read.

We would ask the Board to have due regard for the suite of documents prepared by FDA Consulting, as are enclosed with this application. It is considered that all elements of the proposed development as they relate to drainage, water and associated infrastructure are representative of best practice, all works are clearly presented and that the constraints in the foul drainage network, as identified by Irish Water, have been appropriately addressed.

#### Any Other Business

##### An Bord Pleanála Comments

- Any matters for discussion not raised as agenda headings can now be brought forward for discussion.

##### South Dublin County Council Comments

- The level of contravention of the provisions of the LAP in this case is significant.

It is noted that the enclosed Statement of Material Contravention addresses all elements of the South Dublin County Development Plan 2016-2022 and Tallaght Town Centre Local Area Plan 2020-2026 to which the subject proposal intends to materially contravene.



An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 22nd December 2021, which identified 3 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. We note these items as follows:

1. *Further clarification of the documents as they relate to the nature of the development and the proposed tenure mix.*
2. *Further consideration / justification of the documents as they relate to the height, scale and density of development proposed. In this regard the application should be accompanied by a detailed Rationale / Justification for the proposed density and building heights, having particular regard to section 2.6 of the Tallaght Town Centre LAP 2020 in respect of Intensity of Development and section 3.6 in relation to the Greenhills neighbourhood, and the provisions of the County Development Plan in this regard, as well as the criteria set out in Section 3.2 of the Urban Development and Building Height, Guidelines for Planning Authorities' 2018. This may require possible amendment to the documents and/or design proposals submitted.*
3. *Further consideration and elaboration of the documents as they relate to the design and capacity of the existing vehicular access from the north which is to serve the proposed development. This access route should be described in detail in the application drawings and an assessment of its capacity in terms of width, alignment, pedestrian facilities and existing parking and access functions should be undertaken. The requirement for any improvement works along this route to safely and satisfactorily accommodate the traffic movements arising, and the ability of the applicant to undertake same, should be clearly described. This may require possible amendment to the documents and/or design proposals submitted.*

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016), the provision of the following specific information:

1. *Having regard to the response to item no. 1 above, the Statement of Consistency and Housing Quality Assessment should clearly address the particular requirements of Build-To-Rent and Build-To-Sell accommodation proposed, including inter alia, requirements relating to floor areas, mix, storage, units per core etc. A statement demonstrating compliance with SPPR7 with regard to provision of supporting communal and recreational facilities for BTR accommodation, should be provided.*
2. *A management plan which addresses the varied requirements of the proposed tenure mix within the development, and associated amenities and facilities, as well as the relationship with other commercial uses within the development.*
3. *The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or quantified.*
4. *An analysis of wind microclimate and pedestrian comfort, with reference to pedestrian occupation and usability of new public spaces in the context of the proposed development and adjoining permitted developments. The analysis should also address the safety and comfort of residential amenity spaces, including communal spaces, roof terraces and private upper floor balconies. Any required mitigation or other design measures arising from such assessment should be clearly described and assessed in the study.*
5. *A noise impact assessment having regard to the pattern of commercial uses to the north and east, as well as commercial uses within the proposed development, which should identify measures necessary to ensure the achievement of adequate levels of residential amenity for future occupiers.*

6. *An Aeronautical Assessment in respect of the proposed development.*
7. *Drawings clearly showing the relationship between the proposed development and future public transport improvements along Greenhills Road as part of Bus Connects, including modifications and upgrades to footpaths, bus stops and junctions. The application should clearly describe works in the public realm, including responsibility for completion, and how the development will connect to the existing and future public footpath network on Greenhills Road.*
8. *The application should be accompanied by the following:*
  - a) *A Traffic and Transport Impact Assessment (TTIA), which includes consideration inter alia of proposed modifications to traffic flow on Greenhills Road and roads within the Hibernia Industrial Estate as part of Bus Connects.*
  - b) *A Mobility Management Plan.*
  - c) *A Parking Management Strategy, including detail on the breakdown of parking provision by type and land use.*
  - d) *A Quality Audit demonstrating compliance with the principles and specifications set out in DMURS and the National Cycle Manual. This should include a Road Safety Audit which considers inter alia the design and layout of the proposed car park and the vehicular access route from the north.*
  - e) *Details of the quantum and design of bicycle parking / storage, which should accord with the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments. Regard should be had to the access and operational requirements of such parking / storage provision.*
  - f) *A Servicing and Operations Management Plan for commercial, childcare and residential uses across the site.*

*The application should also address possible impacts on ground floor residential amenities in Block A from commercial servicing arrangements.*

9. *A full landscape and visual impact assessment which shall include photomontages and appropriate CGI's showing the proposed development from the surrounding area. Application documentation should illustrate the relationship between the proposed development and adjoining existing and permitted development in this area.*
10. *A report that specifically addresses the proposed materials and finishes to the scheme, including specific detailing of external finishes, landscaping and paving, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.*
11. *A Building Lifecycle Report in accordance with section 6.13 of the Sustainable Urban Housing Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider the external materials on all elevations. The report shall also address the management and maintenance of public spaces and access routes to the development.*
12. *A site layout plan, which clearly identifies areas to be taken in charge, if any.*
13. *Where the applicant considers that the proposed strategic housing development would materially contravene the South Dublin County Development Plan or the Tallaght town Centre LAP 2020, other than in relation to the zoning of the land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development.*
14. *The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.*

A Statement of Response to Pre-application Consultation Opinion has been prepared by Hughes Planning and Development Consultants, detailing how each of the items outlined in the pre-application consultation opinion from An Bord Pleanála have been addressed in full by the applicant and design team prior to lodgement of this application.

## 6.0 Development Proposal

The proposal, as designed by C+W O'Brien Architects, comprises the demolition of the existing substation on site and the construction of a residential apartment scheme, accommodating a total of 197 no. residential apartments, in 4 no. apartment blocks (Blocks A, B, C & D) ranging in height from 7-8 storeys with maximum height provided within the south-western corner of the site, in the form of a ninth-floor level roof garden, parallel to Greenhills Road.

Further to the provision of residential accommodation, the scheme provides for the construction of a creche facility extending to 329.7sq.m, with associated external amenity space, and 4 no. commercial units providing a total floor area of 871.5sq.m.

The wider scheme has a housing density of 246.25 dwellings per hectare, a plot ratio of 2.4 and a site coverage of 49% with these figures calculated on the basis of the applicant's land ownership of 0.77 hectares (i.e. the application site less the area subject to the letter of consent from South Dublin County Council). More specifically, the development will comprise the following unit mix:

- One-Bedroom Apartment 79 No. Units
- Two-Bedroom Apartment 105 No. Units
- Three-Bedroom Apartment 13 No. Units

We note the height, location and quantum of apartments provided within each block as follows:

Block	Height	Location	Number of Units
A	8 Storey	South-western corner, fronting Greenhills Road	<b>41</b> (6no. one-bed / 34no.two-bed / 1no. three-bed)
B	8 Storey	North-western corner, fronting Greenhills Road	<b>79</b> (33no. one-bed / 34no. two-bed / 12no. three-bed)
C	7 Storey	Central off eastern boundary	<b>42</b> (24no. one-bed / 18no. two-bed)
D	7 Storey	South-eastern corner	<b>35</b> (16no. one-bed / 19no. two-bed)
			<b>TOTAL = 146</b>

Figure 14.0 Details of proposed residential development

All apartments include a kitchen/dining/living area, bathroom and storage area and will be served by private open space in the form of a balcony directly accessible from the main living area. The majority of apartments (60%) exceed the minimum floor area standard for the respective unit types by a minimum of 10% and, thus, provide a high standard of residential accommodation for prospective future residents.

All apartments will have access to communal amenities including 2 no. lounge areas (76.3/38.4sq.m), a gym (211sq.m) and 1,490sq.m of external communal amenity space provided in the form of a first floor level podium and a roof terrace at ninth floor level. A significant quantum of public open space (1,667sq.m) will be provided at ground level, primarily along the western site boundary, to provide an attractive interface between the site and Greenhills Road.

Vehicular/pedestrian access to the subject site will be provided via the north-eastern corner of the site via a new connection to an existing access road off Greenhills Road whilst additional pedestrian access will also be facilitated at various points along the site's western boundary with Greenhills Road.

The development will be served by 78 no. vehicular car parking spaces, and a further 4 no. set-down parking spaces to serve the creche, all provided at ground/surface level. The development will be served by 348 no. bicycle parking spaces, provided at ground level for residents with a further 100 no. bicycle parking spaces provided at surface level to serve visitors of the subject site.





Figure 15.0 Site layout plan for proposed development. We note the provision of car parking (16 no. spaces inclusive of 3 no. car-share spaces and 8 no. EV charging spaces), bicycle parking (100 no. spaces) and set-down car parking (4 no. spaces inclusive of 1 no. accessible space).



Figure 16.0 Western elevation of proposed development, this elevation presents the interface to Greenhills Road.



Figure 17.0 Southern elevation of proposed development (to astropark and Bancroft Park).

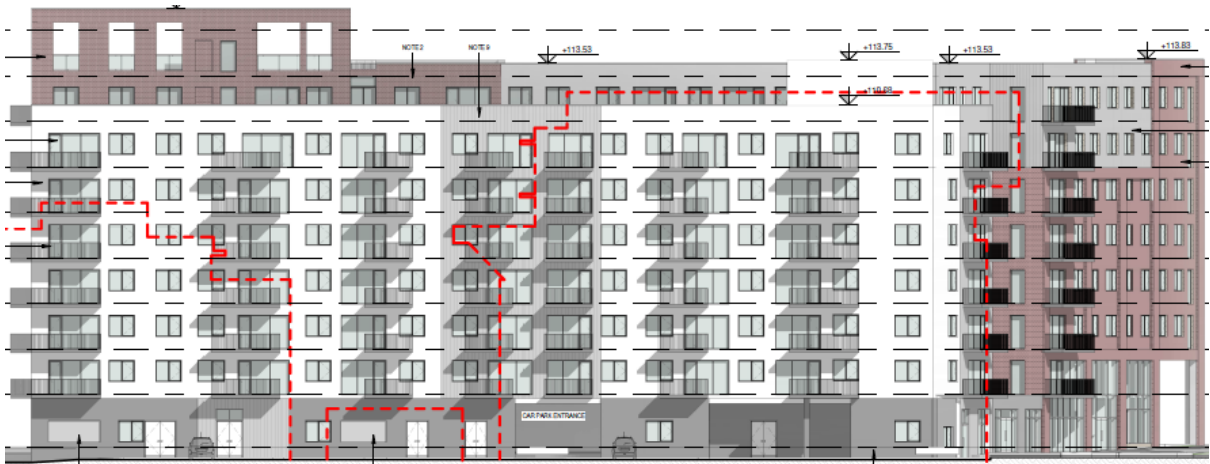


Figure 18.0 Eastern elevation of proposed development (to Hibernian Industrial Estate).



Figure 19.0 North-western elevation of proposed development (to Hibernian Industrial Estate).

It is noted that the red outline presented on the elevational drawings demarcates the height and massing of the development previously approved on site under Reg. Ref. SD07A/0622.



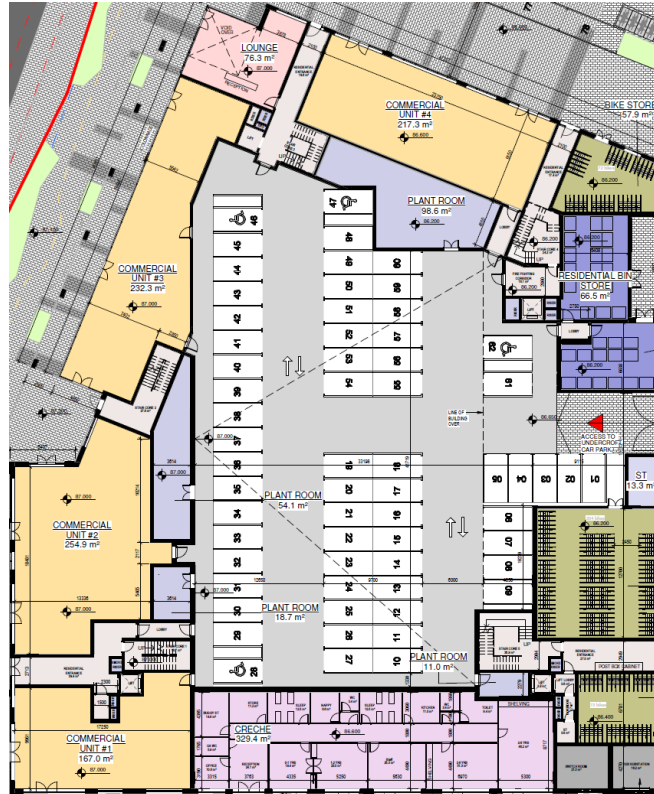


Figure 20.0 Ground floor plan. We note provision of car parking (62 no. spaces inclusive of 4 no. accessible spaces, bicycle parking (348 no. spaces), a resident’s lounge, the creche facility, the 4 no. commercial units, the ESB substation and associated plant rooms.

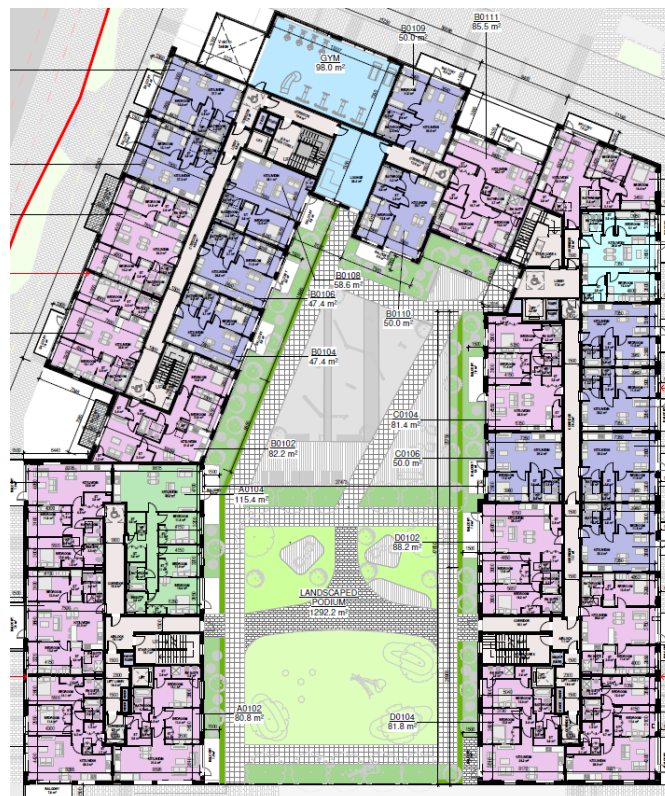


Figure 21.0 First floor plan. We note provision of 28 no. residential apartments (12 no. one-bedroom apartments, 15 no. two-bedroom apartments and 1 no. three-bedroom apartments), a resident’s lounge, gym and external amenity space at this level.



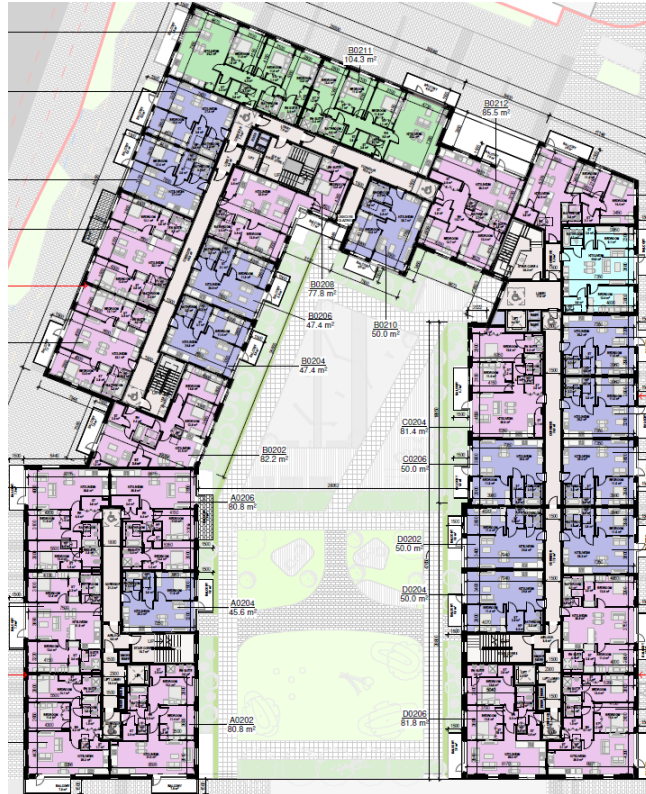


Figure 22.0 Second floor plan. We note the provision of 31 no. residential apartments (13 no. one-bedroom apartments, 16 no. two-bedroom apartments and 2 no. three-bedroom apartments) at this level.



Figure 23.0 Third floor plan. We note the provision of 31 no. residential apartments (13 no. one-bedroom apartments, 16 no. two-bedroom apartments and 2 no. three-bedroom apartments) at this level.



Figure 24.0 Fourth floor plan. We note the provision of 31 no. residential apartments (13 no. one-bedroom apartments, 16 no. two-bedroom apartments and 2 no. three-bedroom apartments) at this level.



Figure 25.0 Fifth floor plan. We note the provision of 31 no. residential apartments (13 no. one-bedroom apartments, 16 no. two-bedroom apartments and 2 no. three-bedroom apartments) at this level.





Figure 26.0 Sixth floor plan. We note the provision of 30 no. residential apartments (11 no. one-bedroom apartments, 16 no. two-bedroom apartments and 2 no. three-bedroom apartments) at this level.



Figure 27.0 Seventh floor plan. We note the provision of 16 no. residential apartments (4 no. one-bedroom apartments, 10 no. two-bedroom apartments and 2 no. three-bedroom apartments) at this level.



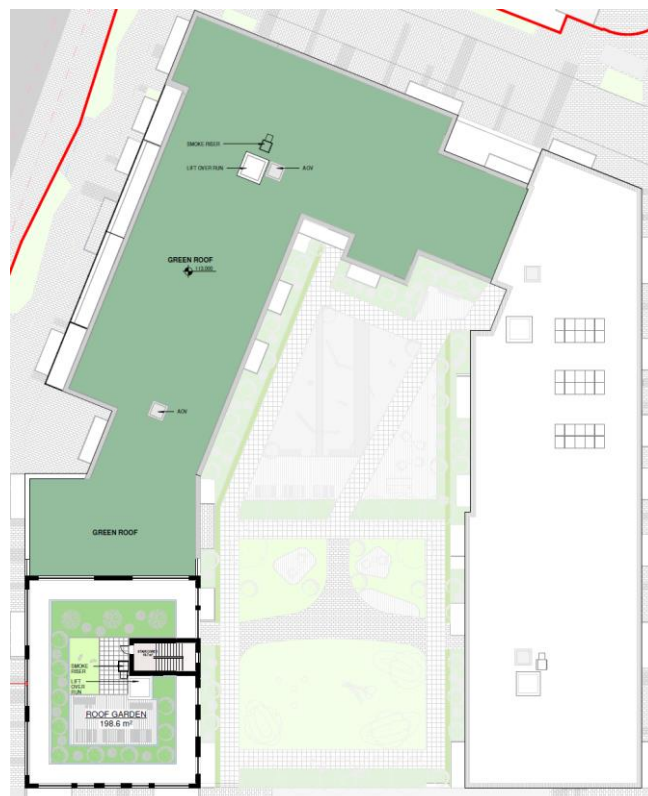


Figure 28.0 Eighth floor plan. We note the provision of a roof garden at this level and green roof/solar panels atop the various blocks.

Further to the architectural drawing extracts, we note computer generated images of the proposed development as per Figures 29.0-31.0 below and overleaf.



Figure 29.0 Computer generated image of the scheme as viewed from Greenhills Road.





Figure 30.0 Computer generated image of the scheme looking south towards Bancroft Park from the first floor level amenity space.



Figure 31.0 Computer generated image of the scheme as viewed from Greenhills Road.

## 7.0 Planning Policy Context

This section of the statement will examine the planning framework, including national, regional and local, that informs the use and development of the subject land. Documents of note are as follows:

- Ireland 2040 - Our Plan National Planning Framework;
- Project Ireland 2040 National Development Plan 2018-2027;
- Urban Development and Building Heights - Guidelines for Planning Authorities (2020);
- Housing for All - A new Housing Plan for Ireland (2021);
- Quality Housing for Sustainable Communities - Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas- Guidelines for Planning Authorities (2009);
- Urban Design Manual - A Best Practice Guide (2009);
- Regional Spatial and Economic Strategy (RSES) for Eastern and Midland Regional Assembly (2019);
- South Dublin County Development Plan 2016-2022;
- Tallaght Town Centre Local Area Plan 2020-2026;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020); and,
- Guidelines for Planning Authorities on Childcare Facilities (2001).

### 7.1 Project Ireland 2040 - National Planning Framework (2018)

Project Ireland 2040 - National Planning Framework seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. We note the below target in relation to national growth:

*'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.'*

Under national core principles, the framework states:

*'The location of new housing provision is to be prioritised in existing settlements as a means to maximising access, a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.'*

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seek to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas, such as Swords 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.'*

Moreover, we would note the following National Policy Objectives (NPO) as per Project Ireland 2040:

- NPO 3a** Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- NPO 3b** 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.



- NPO 11** There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth
- NPO 32** Target the delivery of 550,000 additional households up to 2040 in accordance with the policy objectives of Ireland 2040'. These targets are supported by the ongoing Government initiative 'Rebuilding Ireland.
- NPO 33** Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- NPO 35** Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

The proposed development is consistent with the above as it involves the re-development of brownfield land which is located in close proximity to a number of public transport services.

## 7.2 Urban Development and Building Heights - Guidelines for Planning Authorities

These guidelines as published in 2018, later amended in 2020, by the Minister under Section 28 of the Planning and Development Act 2000 (as amended) following a period of public consultation, are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

These guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas. The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development. In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040.

Specific Planning Policy Requirement (SPPR) Nos. 1 and 4 goes on to outline the following in relation to this:

*'In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.'*

*'It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure: 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines; 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.'*

It is important to note that these SPPRs contain national planning policy requirements which take precedence over the Council's own Development Plan in an aim to break height limitations on development and allow for the introduction of taller buildings into the landscape of Ireland. Furthermore, we note the wording of SPPR No. 3 as follows:

*It is a specific planning policy requirement that where;*

(A)

1. *an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
2. *the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

*then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.*

(B)

*In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme*

(C)

*In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.*

Having regard for paragraph (1) of subsection (A) of SPPR No. 3, we would note Section 5.3.2 'Development Management Criteria' of this report which presents a detailed response to the development management criteria referenced within the Heights Guidelines 2020.

### **7.2.1 Development Management Principles**

Section 3.1 of the Urban Development and Building Heights Guidelines states that planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

It is noted that the design of the proposed development has been informed by policies and objectives of both national and local planning policy. The development complies with the policy provided and positively contributes to the development of the area.

The subject site is situated directly across from a bus stop served by Dublin Bus Route 27, which provides access to Dublin city centre as well as Tallaght Town Centre and the LUAS Red Line. Further bus routes to the city centre via the Tallaght Quality Bus Corridor are provided in Tallaght Village, which is a 10-minute walk to the south of the subject site. It is noted that Greenhills Road forms part of Bus Connects plans for the Tallaght area, improving access to Dublin city centre via bus.

## 7.2.2 Development Management Criteria

Section 3.2 'Development Management Criteria' of the guidelines state that applicants shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that proposals satisfy development criteria at a set of relevant scales. We note the subject proposal's compliance as follows:

### 7.2.2.1 At Scale of the Relevant City / Town

*The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*

As stated previously, the site benefits from an excellent public transport network. There are regular bus services, including Dublin Bus/Go-Ahead Ireland Routes within 150 metres of the subject site. These services provide strong access links to Dublin City Centre, wider employment/recreational centres within Dublin, links to inter-county rail services and Dublin Airport. In addition, we note that the accessibility of the subject site has been extensively detailed in the Traffic and Transport Assessment prepared by Jennings O'Donovan as is submitted with this application.

*Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*

We note the Architect's Design Statement prepared by C + W O'Brien Architects as is submitted with this application. This document details the way the design of the scheme has considered the topography of the immediate area and existing built form to provide an appropriately designed contemporary development. We note that the subject site is not located within an architecturally or culturally sensitive area and is not surrounded by any unique locational characteristics, key landmarks, or key viewpoints.

A Landscape and Visual Impact Assessment (LVIA) has been prepared by Cummane Stratton Reynolds and is submitted as part of this application. The LVIA states that the scheme is a dramatic change in scale and character to existing developments but that this change is part of beneficial change and place making for the Tallaght urban area and the changed urban skyline and street enclosure / definition is regarded as a positive expression of placemaking in a sub-urban area in transition.

*On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.*

The positioning of the eight-storey elements, which represents the maximum height of the proposal, has been arranged to offer maximum separation from any adjoining amenities which could be considered sensitive and to make the most appropriate use of the site's prominent position in the hierarchy of the immediate area. This height is concentrated along the western site boundary with the scheme's height tapering down as it moves to the east. Section 7.7 of this report considers the proposal in the context of the 12 no. design criteria referenced within the Urban Design Manual 2009.

The contemporary form of the proposal will provide visual interest within the immediate area whilst the enhanced public realm, public open space and improved permeability accommodated at ground level represents a direct contribution to local place-making fulfilling the above direction to incorporate new streets and public spaces with the massing of the development appropriate to enclose the central courtyard and providing a valuable public space.



The proposed development includes upgrades to the immediate public realm on Greenhills Road comprising improvements to footpaths along with landscaping and additional planting.

### 7.2.2.2 At Scale of the District / Neighbourhood / Street

*The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape*

The high standard of architectural design achieved in the current proposal has had due regard to the guidance contained within national planning policy in relation to the densification of brownfield sites. The scheme has been designed so as to ensure no undue impacts on existing residential amenity will occur, having regard to the results of the various analysis documents prepared in respect of this application, including Architect's Design Report and Daylight/Sunlight Assessment.

The improvement of the immediate public realm is considered to represent a planning gain for the local area, whilst the extent of amenity spaces provided within the scheme, for future residents, allows variation in the day-to-day life of residents. The provision of ground level commercial units fronting onto the improved public realm, together with enhanced permeability within the immediate area, will directly contribute to the vitality and viability of the local centre. Moreover, the contemporary architectural finish will represent a focal point for the wider area and will add visual interest to the local streetscape.

*The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*

A comprehensive Architect's Design Statement, prepared by C + W O'Brien Architects, demonstrates the rationale for the design of this high-quality scheme of contemporary architecture. The final design avoids long, uninterrupted walls of building fronting on the immediate public realm and is, instead, appropriately broken up to allow for views into and out of the central courtyard to the local public realm with the design unrepresentative of monolithic architecture.

*The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).*

The scheme ensures active surveillance of public and communal open spaces throughout the development. It is considered that the scale of the proposal is appropriate with the heights of the blocks purposefully organised and stepped down to minimise any potential overbearing impacts on existing built form whilst allowing for the appropriate enclosure of the central courtyard for the benefit of future users. Moreover, we would note the enclosed Flood Risk Assessment, as prepared by FDA Consulting, which has been prepared having due regard to the provisions of the "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

*The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*

The proposed development includes upgrades to the immediate public realm and provides a high standard of contemporary architectural design. It is considered that the height in conjunction with the materials of the proposed building together result in the creation of a landmark development which will add legibility to the immediate area and act as a focal point along Airton Road.

*The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.*

The subject proposal provides an appropriate mix of uses as permitted on the site by the applicable 'REGEN' zoning objective. It is considered that the extent of residential accommodation achieved under the subject proposal allows for the efficient use of the site with the associated amenities and commercial units provided at ground floor level providing an active frontage for the benefit of the adjoining public realm.

With regards to dwelling typology, it is considered that the provision of apartment units is the only means of achieving a sufficient density on this well-serviced site and the Build-To-Sell residential model ensures the swift occupation of the development once approved and constructed for the benefit of the quickly evolving landscape of Tallaght.

### 7.2.2.3 At Scale of the Site / Building

*The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*

In response to the above, we note that the organisation of building heights across the subject site and appropriate separation from site boundaries, with maximum heights achieved along the western site boundary, so as to ensure that shadows are primarily cast within the site as opposed to adjoining sites. As detailed in the enclosed Architectural Design Statement prepared by C + W O'Brien Architects, the massing of the proposal carefully considers and minimizes the effects of over shadowing into the communal amenity courtyards and adjoining site to the North. The orientation of the blocks provides the opportunity for direct sun light to penetrate into the communal podium garden level. The orientation of the building also creates pleasant spaces for people to stop, rest and communicate along the commercial street frontage.

The enclosed Daylight & Sunlight Report, as prepared by Passive Dynamics, confirms that the design of the proposal ensures appropriate access to daylight/sunlight for future residents of the scheme whilst having no undue impact on adjoining sites with regards to overshadowing impacts. It is considered that the massing and form of the scheme has been appropriately organised to minimise impacts to views, with the subject proposal considered to allow for the creation of a landmark viewpoint in its own right.

*Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.*

As per the above, the Daylight & Sunlight Report prepared by Passive Dynamics concludes that no material impacts will occur on neighbouring properties. The Daylight & Sunlight Report has been prepared on the basis of the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (the BRE Guidelines). In this regard, we would note that the Daylight & Sunlight Report assumes that 85.3% of combined kitchen/living/dining spaces across the subject scheme meet and exceed the required 2.0% standard as relates to Average Daylight Factor (ADF) whilst 93.4% of units are assumed to meet and exceed the required 1.5% standard in relation to this design element of the BRE guidelines.

It is considered that this level of compliance is appropriate and does not necessitate the provision of specific compensation with regards to individual residential units. The proposal has also been assessed pursuant to daylight standard EN17037 for completeness, even though there is no express requirement to do so in the Apartment Guidelines, Building Height Guidelines or any other planning guidelines. The spatial daylight autonomy results are positive and show that 91.4% of spaces meet the aforementioned European Standard EN17037.

We note good levels of compliance under this non-mandatory standard, although the targets are very challenging and the development does not achieve 100% compliance. With respect to any compliance shortfall against this new standard, we note there is almost full compliance under the British implementation of the European standard, which is adjusted for residential development and is more closely related to the BS 8206-2:2008 standard cited in the Apartment Guidelines and Building Height Guidelines than the EN17037 standard proper.

We also note good levels of compliance under the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) and the BS 8206-2: 2008 – 'Lighting for Buildings – Part 2 Code of Practice for Daylighting'. Finally, we note the following positive characteristics of the development: all units will be provided with a balcony; the development will create generous public and communal open space; the development will result in a significant improvement to the streetscape and deliver an overall high-quality development in a currently vacant site.

It is thus considered that appropriate and reasonable regard has been taken with regards to the quantitative performance approach to daylight provision within the proposed scheme. The proposal contributes to comprehensive urban regeneration of the immediate area allowing for the succinct and contemporary upgrade of a prominent yet underutilised site which commands a significant viewpoint.

#### 7.2.2.4 Specific Assessments

*Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*

In response to the above item, we note the provisions of the enclosed Microclimate Report as prepared by AWN Consulting.

*In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.*

As detailed in the Ecological Impact Assessment prepared by Openfield Ecology, there was no evidence of badgers, deer or hare on site, there is no suitable habitat for otter, pine marten or red squirrel. With regards to bats, we note a bat survey was carried out by Wildlife Surveys Ireland and this notes that bat activity on site was low with no bat roosts identified.

*An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*

The above criteria is not considered to be applicable to the subject proposal given the limited height of proposed built form.

*An assessment that the proposal maintains safe air navigation.*

All requirements of the Irish Aviation Authority (IAA) will be complied with during the construction and operation phases of the proposed development and consultation with the IAA will continue as required during these phases to ensure proper implementation of any measures. Furthermore, we note the provisions of the enclosed Aeronautical Assessment as prepared by Dwyer Jones.

*An urban design statement including, as appropriate, impact on the historic built environment*

An architectural Design Statement has been prepared by C + W O'Brien Architects and is submitted with this application.

*Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate*

The project ecologist, Openfield Ecology, has prepared an Ecological Survey and an Appropriate Assessment Screening for the proposed development as opposed to a Strategic Environmental Assessment (SEA). SEA is an alternative process used to evaluate the environmental effects of proposed policies, plans and programmes. A SEA Report was undertaken for the implementation of the South Dublin County Development Plan 2016-2022, to which the proposed development is subject to, and which has been referenced where appropriate in the documentation.



An assessment against Schedules 7 and 7A of the Planning and Development Regulations, 2001 (as amended), is also enclosed with this application – as prepared by AWN Consulting.

### **7.3 Housing for All - A New Housing Plan for Ireland**

The 'Housing for All - A new Housing Plan for Ireland' was published in September 2021 as part of the Irish Government's 'Our Shared Future' programme which, in turn, sets out the Government's mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has

*'access to sustainable, good quality housing to purchase or rent at an affordable price, built to high standard, and located close to essential services, offering high quality of life.'*

The plan seeks to increase new housing supply to an average of at least 33,000 new units per year with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock.*

We submit that the proposal is consistent with the above policy as it provides an appropriate quantum of residential accommodation on a zoned and serviced suburban site. The provision of residential units on site, in the manner proposed under this application, supports homeownership and affordability, results in increased social housing provision and provides for the efficient use of zoned and serviced land. The proposal responds to a recognised need, at national level, for residential accommodation and is consistent with policy in this regard.

### **7.4 Quality Housing for Sustainable Communities – Guidelines for Planning Authorities**

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.

The guidelines set out the minimum standards for new housing, which the proposed development considerably exceeds. The site is located in close proximity to a significant quantum of recreational amenities, including both sports clubs/facilities and community centres, and is centrally located in respect of local retail centres. In addition, the proposed development provides for a number of residential amenities on site, including a gym and 2 no. resident lounges.

### **7.5 Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009)**

The Sustainable Residential Development in Urban Areas – Guidelines for Planning Guidelines (2009) updated and revised earlier guidance of 1999. These statutory guidelines, which were brought forward to improve the quality of homes and neighbourhoods, set out best practice design criteria and provide a robust framework in which proposals for residential development should be considered.

They establish a series of high level aims for successful and sustainable development in urban areas. The proposed development has been designed to address the provisions of these guidelines, as set out hereunder:

- The design of the proposed development responds appropriately to the site topography and its locational context in terms of block positioning and its scale, massing and architectural treatment. The design of the subject scheme reflects appropriate form of redevelopment along Greenhills Road, in accordance with the South Dublin County Development Plan 2017-2023 and Tallaght Town Centre Local Area Plan 2020-2026 objectives and policies. The proposal provides for the regeneration of a brownfield site in a sustainable manner.

- The location of the proposed development close to public transport routes will ensure good connectivity. Its location adjacent to a bus stop served by Dublin Bus and the provision of 348 no. resident bicycle parking spaces (supplemented by an additional 100 no. visitor bicycle parking spaces at surface level) on site will promote walking and cycling to and from the development.
- The proposed development, by reason of its location on a brownfield site, together with its density and layout, will promote the efficient use of land and of energy, including in relation to transport, and thereby minimise greenhouse gas emissions.
- The proposed development is formed around a landscaped open area at first floor level and will include resident lounges, a gym, creche and commercial units opening onto Greenhills Road.
- The proposed design provides for a high-quality development of purpose-built accommodation. The amenity spaces provided, both internal and external, as well as the communal spaces and facilities provided, will afford a high standard of residential environment.

Having regard to the foregoing, it is considered that the proposed development would be consistent with the Sustainable Residential Development in Urban Areas Planning Guidelines (2009).

## 7.6 Urban Design Manual – A Best Practice Guide 2009

The ‘*Urban Design Manual – A Best Practice Guide, 2009*’ is based around twelve questions that have been drawn up to encapsulate a full range of design considerations for residential development such as that proposed on the subject site. These questions are ‘*a distillation of current policy and guidance and tried and tested principles of good urban design.*’ This report reviews the proposed development in this context in an effort to address the key issues of design, scale, massing and integration with the fabric of the area while respecting the amenity of adjacent properties.

### (i) Context - How does the development respond to its surroundings?

The proposal has been designed to utilise the topography of the site in order to reduce any negative impacts caused by scale and height. Building heights will reduce from eight to seven storeys as one traverses the site from west to east and away from the prominent Greenhills Road. The resident’s lounge at ground floor level provides a meeting point for residents entering/exiting the scheme, whilst the lounge at first floor level provides an area for residents to meet before entering the external amenity space. The resident’s gym provides for further interaction opportunity whilst the amenity space associated with the creche also accommodates child interaction and reinforces the sense of community on site. The proposal seeks to maintain the commercial element that characterises Greenhills Road by providing for 4 no. commercial units at ground level to address and animate this street.

### (ii) Connections - How well connected is the new neighbourhood?

The proposed development scheme has been designed to facilitate quality all-round access, including vehicular, pedestrian and cyclist movement. The site has vehicular access to Greenhills Road that links the site to Tallaght town centre and beyond. Greenhills Road contains a number of bus services connecting the area to Dublin City Centre. It is considered that the proposed residential density is appropriate to the site location in transport terms and will help support efficient public transport.

### (iii) Inclusivity - How easily can people use and access the development?

The proposed development greatly improves permeability through the site. All pathways through the development will be overlooked by apartments, thereby providing passive surveillance over the area and increasing levels of security for pedestrians. Proposed landscaping will create a more attractive environment that will further encourage people to use the area. Within the scheme all areas are designed with level access throughout the internal accommodation and external garden areas.

A wide range of amenity spaces are proposed and all common facilities are fully accessible. All floors in the building are served by lift, as well as by stairs. The proposed commercial units, resident lounges and gym open up the site providing animation to passers-by through its openness at ground floor level.

(iv) *Variety - How does the development promote a good mix of activities?*

The proposal features high quality accommodation and the site is well positioned within reach of many sources of employment as well as hospitals and third level institutions in west Dublin. In addition, the proposal includes 4 no. commercial units and a creche to provide external animation on the street frontages.

(v) *Efficiency - How does the development make appropriate use of resources, including land?*

It is considered that the site is currently underutilised and the construction of a new residential development will bring about a significant improvement to the existing site conditions, bringing the land back into a beneficial use. The redevelopment of this brownfield site for residential accommodation and commercial use will significantly improve the physical environment and provide high-density accommodation on an underutilised site.

Open spaces and roofs are designed with Sustainable Urban Drainage Solutions (SUDS). The proposed development has been laid out to take best advantage of the solar orientation. The layout is designed such that all living / dining / kitchen spaces are positioned to front the central amenity space at first floor level, thereby offering units, which are outward looking, with varied aspects.

(vi) *Distinctiveness - How do the proposals create a sense of place?*

The proposed development, through contemporary design will create a positive addition to the identity of the locality, which will serve as a high-quality distinct development of moderate scale on a brownfield site which is presently severely underutilised. The proposed building at this location on Greenhills Road will have a strong identity and become a distinctive and recognisable place.

(vii) *Layout - How does the proposal create people friendly streets and spaces?*

The layout of the proposed building responds to the site context, the position of adjacent buildings and other proposed developments in the vicinity. The development addresses Greenhills Road and significantly improves the animation of the roadway through the positioning of commercial ground floor units and a significant quantum of residential accommodation at this location.

(viii) *Public Realm - How safe, secure and enjoyable are the public areas?*

A large central amenity space at first floor level, which is overlooked by each apartment block, is provided as part of the subject scheme which will provide a safe place which benefits from passive surveillance and can be enjoyed by the prospective residents. The public areas at ground level are considered to be appropriately designed to encourage interaction between residents of the proposed scheme and people visiting the commercial units.

(ix) *Adaptability - How will the buildings cope with change?*

Adaptability of the design has been considered and it is proposed that all internal walls be constructed in a non-masonry system, thereby allowing future modifications to layouts to be readily implemented.

(x) *Privacy and Amenity - How does the scheme provide a decent standard of amenity?*

The proposed apartments and the shared amenity spaces are designed to meet current design standards, as set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020). In many areas, the minimum standards have exceeded the space requirements in units.

Appropriate acoustic insulation will be designed to prevent sound transmission from one unit to another and from areas of non-residential uses to residential uses. All apartments have access to communal amenity spaces, a gym and lounge areas. The location of the development means that there is no direct overlooking of any other residential properties, and a considerable separation distance existing between the subject site and the apartments to the north-east.



(xi) *Parking - How will the parking be secure and attractive?*

The development is provided with 78 no. on-site car parking spaces, and 4 no. set-down parking spaces for the creche, which is considered appropriate given the sites proximity to numerous bus routes and Tallaght town centre. These car parking spaces, as well as the 448 no. resident/visitor bicycle spaces proposed, will be accommodated centrally on the site at ground floor/ground level. Vehicular and access will be via a secure entrance located in the north-eastern corner of the site, whilst pedestrian/cycle access can be accommodated via the western site boundary.

(xii) *Detailed Design - How well thought through is the building and landscape design?*

The materials and external design of the proposed development make a positive contribution to the locality. Design of the buildings will facilitate easy and regular maintenance. Care has been taken over the siting of flues, vents, bin storage, etc. Please refer to the architectural drawings and Architectural Design Statement, prepared by C + W O'Brien Architects, and the Landscape Plan and Landscape Report prepared by Cummane Stratton Reynolds, which accompany this application.

## **7.7 Regional Spatial and Economic Strategy (RSES) for Eastern and Midland Regional Assembly**

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in 2019. A Regional Spatial & Economic Strategy (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. These Guidelines aim to consolidate a coordinated pattern of settlement and continue to direct growth into compact, sustainable urban forms.

The Settlement Strategy for the Regional Planning Guidelines (RPG) is focused on achieving key principles contained within the RPG vision:

- *Achieving the potential of the GDA as an international Gateway*
- **Consolidated and sustainable cities and towns**
- *Supporting high quality public transport, and increase opportunities for walking and cycling*

It is noted that Regional Policy Objective No. 4.3 'Consolidation and Re-Intensification' supports the proposed development as follows:

*'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.'*

## **7.8 Design Manual for Urban Roads and Streets (2013)**

The proposal has been designed having regard to the Design Manual for Urban Roads and Streets (2013). Compliance with this manual is discussed in the DMURS Compliance Statement, prepared by Jennings O'Donovan, which accompanies this application.

## **7.9 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)**

The proposal has been designed having regard to the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Compliance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) is discussed in the Flood Risk Assessment, prepared by FDA Consulting, which accompanies this application.

## 7.10 South Dublin County Development Plan 2016-2022

The South Dublin Development Plan 2016-2022 is the relevant statutory plan for this area.

### 7.10.1 Land Use Zoning

Under the South Dublin County Development Plan 2016-2022, the subject site is zoned 'REGEN', the objective of which is 'To facilitate enterprise and/or residential-led regeneration' (refer to map in Figure 32.0). Land uses permitted in principle in this zoning consist of the following:

*'Advertisements and Advertising Structures, **Childcare Facilities**, **Community Centre**, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq.m, Offices 100 sq.m – 1,000 sq.m, Offices over 1,000 sq.m , Open Space, Petrol Station, Public Services, **Recreational Facility**, **Residential**, Restaurant/Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local, Sports Club/Facility, Stadium, Traveller Accommodation.'*

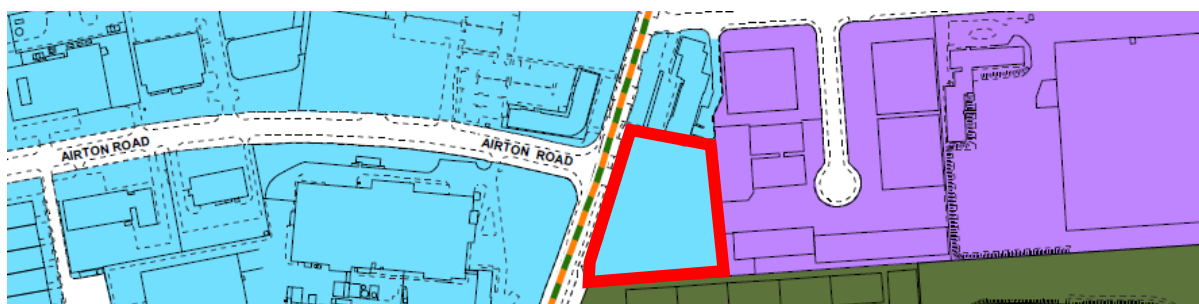


Figure 32.0 Extract from South Dublin County Development Plan 2016-2022 zoning Map No. 9 showing the site (outlined in red) within lands with Zoning Objective 'REGEN'.

The 'REGEN' zoning classifications in the South Dublin County Development Plan 2016-2022, is aimed at supporting and facilitating the regeneration of underutilised industrial lands that are within close proximity to town centres and/or public transport nodes, with a particular emphasis on more intensive enterprise and residential led development. The 'REGEN' zone is a relatively broad zoning designation under which a wide range of uses may be permitted.

Section 4.3.2 'Employment and residential in Regeneration Zones' set out in the South Dublin County Development Plan 2016-2022 outlines how the Council recognises that there are a high level of vacant lands of poor environmental quality throughout the county, and will seeks to support and facilitate a more intensive mix of enterprise and/or residential led development in 'REGEN' zoned lands, in particular in instances where the regeneration relates to underutilised industrial lands that are in close proximity to town centres and public transport nodes.

**Policy ET2:** *It is the policy of the Council to facilitate and support the regeneration of underutilised industrial areas that are proximate to urban centres and transport nodes and to promote and support more intensive compatible employment and/or residential led development in regeneration zones.*

**ET2 Objective 2:** *To support proposals for more intensive compatible enterprise and/or residential led development on lands designated with Zoning Objective 'REGEN', subject to appropriate design safeguards and based on a traditional urban form that adhere to urban design criteria.*

The subject proposal is a standard residential apartment development with a limited quantum of commercial accommodation including a creche, on an otherwise underutilised brownfield site that is well served by high frequency public transport services, which include Dublin Bus and LUAS services within Tallaght, all of which offer direct links to Dublin City Centre and the wider Dublin area. The application site is also within close proximity of Tallaght Village and TUD Tallaght, where there is a variety of recreational, educational, commercial, employment and retail facilities.

### 7.10.2 Core Strategy

Set out in Chapter 1 of the South Dublin County Development Plan 2016-2022 is the 'Core Strategy', which outlines the medium to long term strategy for the spatial development for the county by way of policies and objectives, translating the strategic planning framework set out at national and regional levels. The following policies and objectives set out in the 'Core Strategy' are relevant to this proposal.

**Policy CS1:** *It is policy of the Council to promote the consolidation and sustainable intensification of development to the east of the M50 and south of the River Dodder.*

**CS1 Objective 2:** *To promote and support the regeneration of underutilised industrial areas in areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led development).*

**Policy CS2:** *It is the policy of the Council to support the sustainable long-term growth of Metropolitan Consolidation Towns through consolidation and urban expansion.*

**CS2 Objective 4:** *To promote and support the regeneration of underutilised industrial areas within areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led regeneration).*

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

The objective of the 'Core Strategy' is to focus residential-led development to areas with capacity to absorb more intensified forms of development that support the long-term growth of the Metropolitan Consolidation Towns set out in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The 'Core Strategy' makes particular reference to higher residential densities being supported at appropriate locations in close proximity to town centres or high-capacity public transport nodes, noting underutilised industrial lands, or 'REGEN' zoned lands, adjacent to LUAS/Rail services as priority sites.

The proposal will provide for the intensification of an otherwise underutilised industrial site that is zoned for residential-led regeneration and is well served by high-capacity public transport services, including high frequency bus routes connecting the site to the Dublin city centre, Tallaght Village, Tallaght Town Centre and Tallaght LUAS Stop. It is submitted that the proposal is therefore in accordance with the objectives of the 'Core Strategy' as set out in the South Dublin County Development Plan 2016-2022.

### 7.10.3 Housing Policies

As set out in Chapter 2 of the South Dublin County Development Plan 2016-2022, a core objective is to provide new housing of good quality, with a focus on the creation of sustainable new communities at locations that can be well served by high quality public transport, with a particular focus on the intensification of infill and brownfield lands with links to existing transport services.

It is noted in this section of the development plan that South Dublin County Council will require 32,132 additional housing units over the period from 2015 to 2022, and the 'Interim Housing Strategy' forecasts that 8,303 social housing units will be required during this period as well, with approximately 2,000 housing units being delivered through Part V of the Planning and Development Act 2000 (as amended). The following development plan policies (see overleaf) are relevant to the proposal on the subject site:

**Policy H2:** *It is the policy of the Council to seek to ensure that sufficient zoned land continues to be available at appropriate locations to satisfy the housing requirements of the County.*

**Policy H6:** *It is the policy of the Council to support the development of sustainable communities and to ensure that new housing development is carried out in accordance with Government policy in relation to the development of housing and residential communities.*



- Policy H7:** *It is the policy of the Council to ensure that all new residential development within the County is of high quality design and complies with Government guidance on the design of sustainable residential development and residential streets including that prepared by the Minister under Section 28 of the Planning & Development Act 2000 (as amended).*
- Policy H8:** *It is the policy of the Council to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context.*
- Policy H9:** *It is the policy of the Council to support varied building heights across residential and mixed-use areas in South Dublin County.*
- Policy H11:** *It is the policy of the Council to promote a high quality of design and layout in new residential development and to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development.*
- Policy H13:** *It is the policy of the Council to ensure that all dwellings have access to high quality private open space (inc. semi-private open space for duplex and apartment units) and that private open space is carefully integrated into the design of new residential developments.*
- Policy H14:** *It is the policy of the Council to ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.*
- Policy H15:** *It is the policy of the Council to promote a high standard of privacy and security for existing and proposed dwellings through the design and layout of housing.*

The objective for housing in the South Dublin County Council administrative area is provide high quality residential development that contributes to the communities. In this regard housing in 'REGEN' zoned lands at higher density will be supported where it respects the residential development established in the surrounding area and complies with the Government guidance in terms of design and sustainability, adaptability and where adequate private amenity open space and public open space is provided with passive surveillance. Higher buildings will also be supported in such areas, however, varied heights is preferable.

The proposal for the site is to construct a mixed-use development scheme, predominantly comprising residential apartment units atop ground floor level commercial units in 4 no. blocks of varying heights. The proposed blocks have been designed and scaled to respect established built form within the surrounding area as well as the higher scale development character of the area to the west, whilst providing a layout that allows an adequate provision of surveillance over public spaces within and surrounding the application site, particularly the street to the west and public open spaces immediately south.

Furthermore, the proposed apartment units have been designed to comply with the varying quantitative standards as set out in the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)*. See section 5.5 for further details regarding the applicable standards. The proposed development provides a housing choice in a suitably located area, offering a mix of apartments on an otherwise underutilised industrial site and is therefore consistent with the housing objectives set out in the development plan.

#### **7.10.4 Building Height**

It is stated in Section 5.1.5 'Building Height in Urban Areas' of the South Dublin County Development Plan 2016-2022 that varied building heights are supported for proposed developments within urban centres and regeneration zones, and are recognised as playing a key role in creating a sense of place, urban legibility and visual diversity. It is noted in this section of the development plan that proposals for building in excess of five-storeys in height will only be considered at strategic and landmark locations in Town Centres, Regeneration and Strategic Development Zones in accordance with Local Area Plans or SDZ Planning Schemes.

**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.*

The subject site is situated within 'REGEN' – Regeneration area, which under the current development plan is designated for building heights up to five-storeys and allows for up to seven-storeys at landmark locations. It is considered that the site's location adjacent to Bancroft Park, allows for a taller development which would overlook the park and provide a gateway into the Greenhills area.

### 7.10.5 Car Parking and Traffic

The South Dublin County Development Plan 2016-2022 requires any new development provide a maximum of car parking spaces depending on the location of the development. The maximum parking rates for residential development are divided into 2 no. categories, which are as follows:

**Zone 1:** *General rate applicable throughout the County.*

**Zone 2:** *(Non-Residential): More restrictive rates for application within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high-quality bus service (including proposed services that have proceeded to construction).*

**Zone 2:** *(Residential): More restrictive rates for application within town and village centres, within 400 metres of a high-quality public transport service 5 (includes a train station, Luas station or bus stop with a high-quality service)'.*

The maximum parking rates associated with new residential developments, as set out in Table 11.24 of the South Dublin County Development Plan 2016-2022 are as follows:

- 1 no. space per 1 bed apartment in Zone 1 and 0.75 spaces in Zone 2;
- 1.25 spaces per 2 bed apartment in Zone 1 and 1 space in Zone 2; and,
- 1.5 spaces per 3+ bed apartment in Zone 1 and 1.25 spaces in Zone 2

The proposed development, on the basis of its proximity to a bus stop served by a high frequency bus route, is situated in Zone 2. Having regard to the above standards, the following table provides a breakdown of the **maximum** no. of parking spaces permissible for the proposed development scheme.

	No. of 1 Bed Apartments	No. of 2 Bed Apartments	No. of 3+ Bed Apartments	Applicable No. of Maximum Spaces
Proposed Development	79 (x 0.75 spaces) = 59.25	105 (x 1 spaces) = 105	13 (x 1.25 spaces) = 16.25	<b>180.5</b>

Figure 33.0 Table showing the breakdown of car parking spaces required to serve the proposed development scheme

It is noted in Section 11.4.2 'Car Parking Standards' of the South Dublin County Development Plan 2016-2022 that the number of spaces set out above are not to be exceeded, and in some instances a lower rate of parking may be acceptable subject to the following:

- *The proximity of the site to public transport and the quality of the transport service it provides. (This should be clearly outlined in a Design Statement submitted with a planning application),*
- *The proximity of the development to services that fulfil occasional and day to day needs,*
- *The existence of a robust and achievable Workforce Management or Mobility Management Plan for the development,*
- *The ability of people to fulfil multiple needs in a single journey,*
- *The levels of car dependency generated by particular uses within the development,*
- *The ability of residents to live in close proximity to the workplace,*
- *Peak hours of demand and the ability to share spaces between different uses,*
- *Uses for which parking rates can be accumulated, and*
- *The ability of the surrounding road network to cater for an increase in traffic.*

Furthermore, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) outline that the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria. The following guidance is provided with regards to Central and/or Accessible Urban Locations:

*In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such as rail and bus stations located in close proximity.*

*These locations are most likely to be in cities, especially in or adjacent to (i.e., within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART; commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10-minute peak hour frequency) bus services.*

The scheme includes, at ground floor/surface level, a total of 78 no. car parking spaces (plus 4 no. set-down car parking spaces to serve the proposed creche) which falls short of the maximum parking rates set out in the South Dublin County Development Plan 2016-2022.

The proposed car parking provision is considered appropriate having regard to the subject site's proximity to a high frequency bus route, No. 27, on Greenhills Road which provides direct links to Dublin city centre as well as Tallaght Town Centre and LUAS Stops in the area. The development also features a large number (348) of secure bicycle spaces for residents at ground floor level, with 100 no. visitor bicycle parking spaces provided at surface level, further encouraging sustainable transport options.

#### **7.10.6 Public Open Space**

The South Dublin County Development Plan 2016-2022 requires all new residential development to incorporate a minimum of 10% of the total site area as public open space. With the subject site extending to 0.8 hectares, this would lead to a requirement to provide 800sq.m of public open space. The subject proposal provides for 1,667sq.m of public open space, or 208% of the required minimum quantum, and thus complies with the required standard.



## 8.0 Tallaght Town Centre Local Area Plan 2020-2026

The subject site is located within the Tallaght Town Centre Local Area Plan 2020-2026 area. This Local Area Plan (LAP) was adopted on 8<sup>th</sup> June 2020 and came into effect on 20<sup>th</sup> July 2020. The purpose of the LAP is to facilitate the future development of Tallaght Town centre, with the aim of creating a vibrant sustainable town.

### 8.1 Land Use Zoning

Section 2.4.1 'Types of Development and Land Use Mix' of the LAP sets out the land use strategy for Tallaght. The strategy has been informed by the planning and sustainable development criteria for area, such as proximity to existing and future public transport. The objective of the strategy is to locate future development to lands that are in close proximity to public transport services.

As shown in the extract Urban Function map (included in Section 2.0 of the LAP) below, the application site is located in the 'Greenhills' area and is subject to land use zoning - 'Industry/Distribution'.

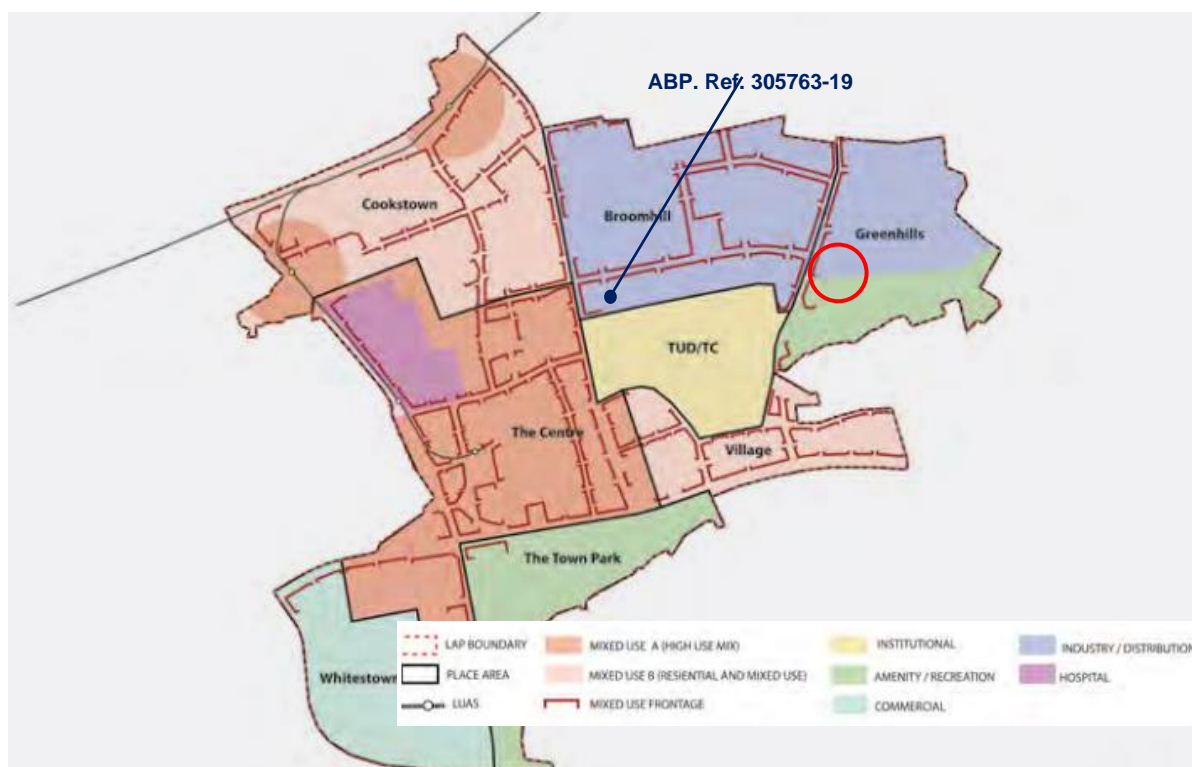


Figure 34.0 Urban Function Map from Tallaght Town Centre Local Area Plan 2020-2026 (subject site identified with red circle)

Section 2.4.2 'Mixed-use Frontages' of the plan provides guidance on mixed-use frontages. It requires that all mixed-use frontages identified in the Urban Function concept are required to have a mixed-use element and have a non-residential frontage at ground floor level, or some other acceptable alternative which performs the same function of providing activity at ground floor level. The aforementioned section of the LAP also notes that some residential elements will be considered in Broomhills and Greenhills along mixed-use frontages identified in the urban framework.

It is submitted that the scheme is compliant with the zoning objectives for the land, in that it provides mixed used frontage with Greenhills Road as per the Urban Function Map above. Furthermore, we note the recent decision by An Bord Pleanála to grant permission for a residential scheme adjacent to the proposed development under ABP. Ref. 305763-19. It is also considered that residential/commercial uses at this location will provide activation and passive surveillance on Greenhills Road and Bancroft Park, thereby improving the safety of pedestrians moving through the area.

Section 5.2.2 'Housing Options' of the LAP notes the importance of providing an appropriate housing tenure mix in the area. Section 5.2.2 further states:

*'It is an ambition of the LAP to encourage the provision of at least 30% owner occupied units across the LAP area.'*

In light of the above, we consider that the proposed scheme will directly contribute to the ambition of the LAP in the context of providing residential units for sale to the general public.

## **8.2 Key Objectives**

5 No. Key Objectives are outlined for the 'Greenhills' Neighbourhood in Section 3.2 'The Centre' of the LAP. We note and respond to these objectives, in the context of the subject proposal, as follows:

### ***GH1 Intensification of use to higher value commercial and employment uses***

The subject development proposal has been designed to have regard for the historical function of the subject site with an appropriate quantum of commercial floor area provided at ground floor level. It is considered that the extent of commercial floor area provided, given the location of the subject site and its suitability for residential development, is sufficient and that the provision of residential accommodation at this location will not detract from the wider objective of providing commercial and employment uses within the wider area.

### ***GH2 New local routes and connections to Bancroft Park***

Whilst direct connection to Bancroft Park cannot be facilitated via the southern boundary of the subject site, given the nature and design of the adjoining astropark to the immediate south, it is considered that the subject proposal will improve permeability within the immediate area by nature of the intended access arrangements.

### ***GH3 Improved interface with Bancroft Park and Greenhills Road***

The proposed development will allow for a significantly improved interface between the subject site and Greenhills Road which will benefit the wider aspect of Airton Road. The scheme will also provided benefit to Bancroft Park in the form of heightened passive surveillance.

### ***GH4 Protect and enhance recreational amenities and green infrastructure value of Bancroft Park***

Whilst the subject proposal does not provide a direct improvement on the recreational amenity and green infrastructure values of Bancroft Park, it is considered that the provision of additional passive surveillance will intrinsically improve the safety of the park for general users.

### ***GH5 Protection of residential amenity of adjoining residential areas.***

The subject development proposal will present no impact on the residential amenity of local residents given its separation from adjoining residential sites. The subject proposal helps achieve the above key objectives as it introduces commercial and residential use to this underutilised site; establishes new routes and connections to Bancroft Park; delivers a strong building line on Greenhills Road; and protects the amenity of nearby residential areas.

## **8.3 Plot Ratio, Height and Built Form**

Plot ratio, height and built form (discussed in Section 2.6 'Intensity of Development' of the LAP) will be used to determine and assess the intensity, scale and bulk of development in the Plan lands. The design and layout of each plot will need to take account of its context and be designed accordingly.

### ***Plot Ratio***

To inform the assessment of each planning application, plot ratio will be used as an important determinant in assessing the intensity of a proposed development. Table 2.0 included in Section 2.6.1 'Plot Ratio' of the LAP sets out a range of appropriate plot ratios across the plan lands, where proposals go beyond the plot ratio identified the proposal would need to deliver significant public gain. The recommended plot ratios for Greenhills are 0.75-1.0, increasing to 1.5 where it is demonstrated that the site is within 500m walking distance of high-capacity public transport.

To reflect the importance of placemaking at key public transport stops and key public spaces, flexibility in relation to the plot ratio range and the potential for higher buildings (2-4 storey increase on typical levels set in the LAP) may be considered at certain locations which are considered to be key or landmark sites, subject to exceptional design which creates a feature of architectural interest, a significant contribution to the public realm at these locations and mixed uses at ground floor level. These requirements are subject to criteria for taller buildings set out in Section 2.6.2 'Height and Built Form' of the LAP. This provision may apply where the site is directly adjacent to the following:

- High-capacity public transport stops (i.e., a Luas stop or high frequency bus stop (i.e., 10-minute peak hour frequency) on a dedicated bus lane);
- The proposed 'New Urban Square' north of Belgard Square North in the Centre neighbourhood;
- The proposed 'New Urban Square' within the Cookstown neighbourhood; and
- The proposed Transport Interchange and adjacent proposed 'Urban Space' in the Centre neighbourhood.

This provision will only apply to the extent of a site which is within 100m walking distance of the above locations and will only be considered where the Planning Authority is satisfied that provision of the above facilities will be achieved. In the longer term, over a period of up to 20 years, it is envisaged that the full build out of the LAP lands could deliver between 9,700 to 12,800 new homes, achieve a population of up to 38,000 people within the LAP lands and an additional 570,000sqm to 918,000sqm of non-residential floor space which could accommodate an additional 4,700 to 12,800 jobs. To reach this target, it is considered that higher density residential developments will play an important role in Tallaght.

The proposed development includes 197 no. residential apartments, 4 no. commercial units (871.5sq.m total) and a creche (329.7sq.m) and provides for a plot ratio of 2.4. Although in exceedance of the above maximum, we consider the plot ratio proposed to be appropriate in light of recent National policy guidance regarding the intensification of development in areas well serviced by public transport and in the context of the development approved (plot ratio of 3.41:1), under ABP Case No. 303803-19, south of the subject site at Unit 5A-C Second Avenue, Cookstown Industrial Estate, Tallaght, Dublin 24.

### Height

As mentioned previously, the subject site is situated within an area known as the Greenhills Neighbourhood Area under the LAP. This area is designated for buildings of up to six-storeys in height, as shown in the Overall Urban Structure Diagram in Figure 35.0 overleaf. The LAP notes that proposed building heights must be supported by design data and studies confirming compliance with established sunlight, daylight, overlooking and other residential amenity minimum design standards as required under Design Standards for New Apartments (2018). Building heights will also be evaluated against topography, cultural context, key landmarks, and key views as required by Building Height Guidelines.

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 (6–7 storeys Residential, +1 recessed and 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 and building height is lower along tertiary routes, within the network of secondary streets).*

In the interest of place making and improving legibility, landmark buildings are permissible at key locations that will punctuate urban areas. In general, buildings that exceed the prescribed general buildings heights should only be provided at the locations indicated as having 'Potential for Higher Buildings' in the Building Height Strategy. The increased height proposed for the development is considered appropriate due to the subject site's location on a primary route and its landmark location at corner of Bancroft Park and gateway between Tallaght village and Greenhills. Furthermore, the subject site will serve to terminate eastward views along Airton Road and will 'book end' the road, providing strong urban form and improving the legibility of the Greenhills area.



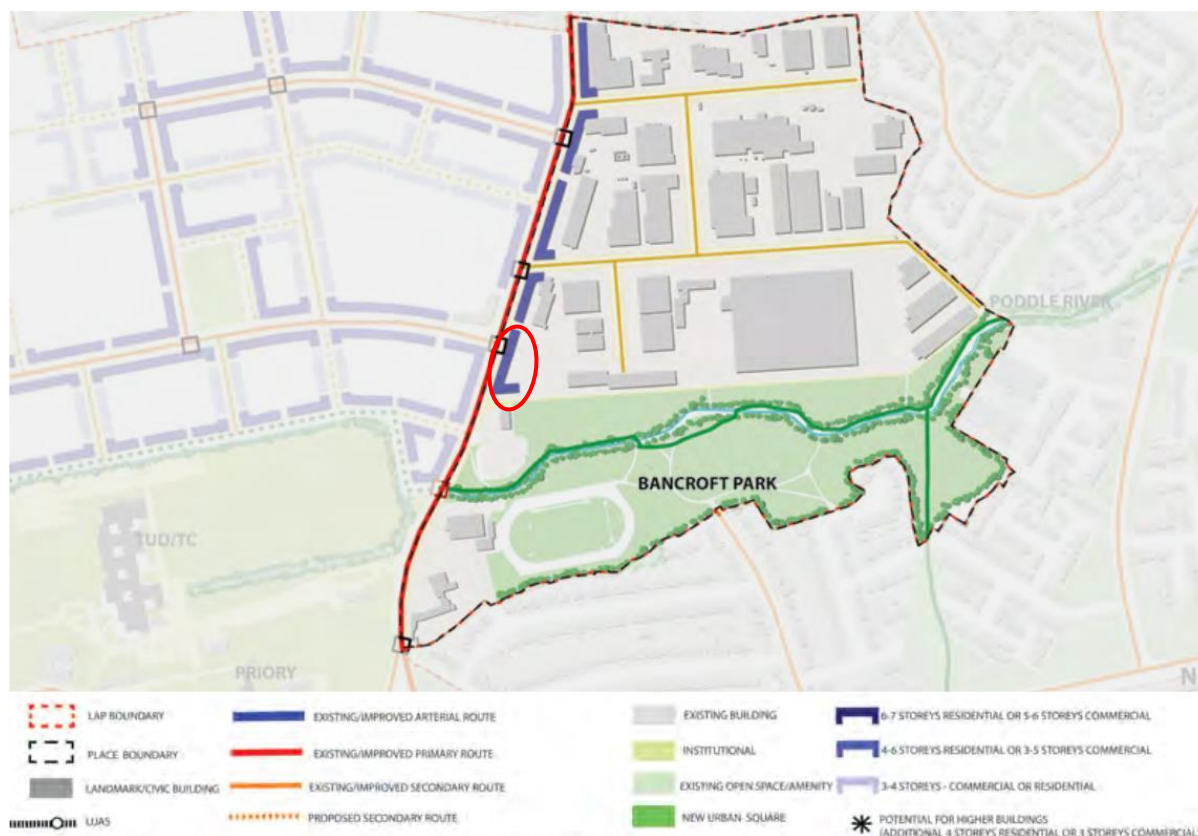


Figure 35.0 Overall Urban Structure Diagram included in Figure 2.4 in Section 2.3 of the LAP (subject site identified with red circle).

### Built Form

Specific guidance is provided in relation to build form, more specifically street interface, urban grain and building setback, in Section 2.6.2 'Height and Built Form' of the LAP. The proposed development is consistent with this guidance as:

- The scheme presents a well designed and set-back building line to Greenhills Road;
- The scheme provides an appropriate mix of commercial units at ground floor level which, in conjunction with the open western site boundary, presents an interesting interface to Greenhills Road; and,
- The scheme has been designed to clearly differentiate between the residential and commercial elements of development on site with the main façade to Greenhills Road presenting a contemporary form of architecture.

The proposal will provide for the development of a landmark building on the junction of Airton and Greenhills Roads which, in turn, will act as a gateway between Tallaght village and the industrial estates to the north.

### **8.4 Block Form**

Section 2.6.3 'Block Side and Form' of the LAP sets out policies in relation to block form and states the following in relation to block form:

*New buildings shall be laid out in perimeter blocks across the Plan lands. Such blocks shall be used to enclose private and semi-private open spaces and, depending on the context and demonstration of need, larger blocks or irregular sized blocks may contain small scale development. All perimeter blocks shall be designed according to the following principles:*

- *Building massing to the perimeter of the block;*

- *Building frontage to all sides, including the shorter sides (secondary street frontage) of the block;*
- *Proper design and attention to corners, avoiding dead or windowless gables;*
- *A continuity of building frontage, which relates to the local or urban context, and avoidance of blank walls;*
- *An appropriate scale of buildings to provide the appropriate level of enclosure of the streets and spaces;*
- *Adequate back-to-back distances within the block;*
- *Appropriate building setbacks from the street in line with the use of ground floors;*
- *Adequate arrangements for car parking and access around, within or below the block;*
- *Carefully considered subdivision of the block into plots where fine urban grain or mixed use is proposed; and*
- *Appropriate consideration of building height within the block to facilitate adequate levels of sunlight and daylight penetration.*

The subject proposal is consistent with the above as: the proposal introduces blocks along the Greenhills Road frontage; the proposal provides a landscaped courtyard in the centre of the site which has high levels of solar access and also provides a degree of separation from the adjacent blocks; the building's facades feature windows and balconies which ensure they don't present as blank walls; the proposed development is provided with access to a suitably designed ground level car park; and the building's higher element has been positioned in the south-eastern corner.

### **9.0 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)**

The proposed development has been designed to be fully compliant with the standards set out in Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2020). The Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness, per Housing for All - A new Housing Plan for Ireland, and Project Ireland 2040 and the National Planning Framework, published since the 2015 guidelines.

#### Minimum Overall Apartment Floor Areas

The overall floor area sizes required for apartment units outlined in the Guidelines are as follows:

- *One-Bedroom Apartment (2 Persons)            45sq.m*
- *Two-Bedroom Apartment (4 Persons)        73sq.m*
- *Three-Bedroom Apartment                    90sq.m*

The floor areas for each of the different apartment types are fully compliant with the various floor area and floor width standards, and in most instances are in excess of the required minimum standards set out in the guidelines for new apartments as illustrated in the apartment type drawings included in the Architectural Drawings and the schedule of accommodation, prepared by C+W O'Brien Architects.

Each apartment also meets the required standards for living/dining/kitchen areas, bedrooms and aggregate bedroom floor areas and storage requirements. In addition, it is noted that the requirement for the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10%, has been complied with (60% of units exceed minimum floor area by 10%).

#### Dual Aspect Ratios

Specific Planning Policy Requirement 4 provides guidance in regards to dual aspect apartments. The minimum number of dual aspect apartments are as follows:

- A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*

- (ii) *In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- (iii) *For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.*

Whilst the proposed development is situated within a suburban/intermediate location, it is also considered highly accessible relative to educational, recreational and general commercial amenities, and public transport services.

On this basis, it is considered that the proposal, which falls slightly below the recommended minimum percentage of dual aspect units at 46.7% (92 no. of 197 no. apartments are dual aspect) provides an appropriate quantum of dual aspect units.

### Sunlight & Daylight Access

Whilst the apartment guidelines do not present a specific standard in relation to sunlight and daylight access, the guidelines note that *the amount of sunlight reaching an apartment significantly affects the amenity of the occupants*. The enclosed Daylight & Sunlight Report has been prepared on the basis of the Building Research Establishment's Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (the BRE Guidelines).

In this regard, we would note that the Daylight & Sunlight Report assumes that 85.3% of combined kitchen/living/dining spaces across the subject scheme meet and exceed the required 2.0% standard as relates to Average Daylight Factor (ADF) whilst 93.4% of units are assumed to meet and exceed the required 1.5% standard in relation to this design element of the BRE guidelines.

Notwithstanding the site's relatively unburdened nature in the context of adjoining built form and adjoining development sites, it is considered that the achieved percentages indicate an excellent quality of lighting which will ensure a high standard of residential amenity for future residents.

### Floor to Ceiling Height

The Guidelines require minimum floor to ceiling heights of 2.4m for apartments above ground floor, and 2.7m at ground floor to allow flexibility for future use. The floor to ceiling heights proposed in the subject scheme comply with the Guidelines in both respects.

### Security Considerations

Section 3.40 of the Apartment Guidelines recommends that, in order to ensure visitor and occupant safety, natural surveillance should be maximised for all streets, open spaces, play areas and any surface bicycle or car parking areas. Particular attention should be given to entrance points being well lit and overlooked in building blocks.

Consideration should also be given to incorporating privacy strips in instances where ground floor apartments front onto public footpaths. The proposed development has been designed in a manner that allows for maximum natural surveillance throughout the development site, with windows/balconies overlooking all internal and external public spaces.

### Private Amenity Space

As previously discussed, all residential units within the scheme are served by an area of directly accessible private amenity space. Each of these units, at a minimum, meets the below standards as set by the Apartment Guidelines (2020):

- *One-Bedroom Apartment (2 Persons)*                      5sq.m
- *Two-Bedroom Apartment (4 Persons)*                      7sq.m
- *Three-Bedroom Apartment*                                      9sq.m



### Communal Amenity Space & Recreational Amenities

With regards to the quantum of communal amenity space provided, we note the below standards required for apartment units, as outlined in the Guidelines:

- *One-Bedroom Apartment (2 Persons)*      5sq.m
- *Two-Bedroom Apartment (4 Persons)*      7sq.m
- *Three-Bedroom Apartment*      9sq.m

Further to the above, we note the below table, which confirms that the scheme is fully compliant with the minimum standards for communal amenity space. To set a higher requirement for assessment, this table assumes that all 2 bedroom units within the scheme can accommodate 4 no. persons.

<b>Minimum Floor Area – Communal Amenity Space</b>		
<b>Unit Type</b>	<b>Requirement</b>	<b>Communal Space Required/Provided</b>
1 Bedroom	5sq.m (79no. units = 395sq.m)	1,247sq.m / 1,490.8sq.m
2 Bedroom (4P)	7sq.m (105no. units = 735sq.m)	
3 Bedroom (5P)	9sq.m (13no. units =117sq.m)	

Figure 36.0 Table showing the provided communal amenity space (1,490.8sq.m) in comparison to the required space (2,247sq.m) for the development.

### Children's Play Areas

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) provides the following guidance with regards to children's areas:

*Children's play needs around the apartment building should be catered for:*

- *within the private open space associated with individual apartments;*
- *within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*
- *within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.*

As stated previously, the proposal provides 1,490.8sq.m of external communal amenity space, spread over external amenity spaces at first and ninth floor level. A dedicated play area is provided within the landscaped podium area at first floor level with sufficient variety and functionality to be enjoyed by children and teenagers. As an aside, it is noted that the creche facility will be served by a usable external space. For further information with regards to play areas, we would ask the Board to have regard for the relevant sheets in the Landscape Design Statement prepared by Mitchell + Associates.

### **10.0 Guidelines for Planning Authorities on Childcare Facilities (2001)**

The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions. The following definition of Childcare is included in the Guidelines:

*'In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.'*

As set out on the architectural drawings accompanying this application, the proposed childcare facility comprising 329.7sq.m is considered appropriate for the subject site. The exact capacity of the proposed childcare facility will only become apparent when an operator comes on board and will be subject to operator's particular requirements and will be dependent on what types of childcare facility are already available in the area. However, it is estimated that this childcare facility could cater for the in the order of 82-110 no. children having regard to an accepted industry average of c. 3 to 4 sq.m gross floor space per child depending on the type of childcare offered by the end user. This generally complies with the minimum place requirements set out in the abovementioned guidelines.

The creche will serve residents of the subject development as well as residents of the surrounding area. It is envisaged that parents will drop-off children on their way to work within the town or on-route to the bus stop, however, a dedicated drop-off area is provided at ground level to serve the proposed creche.

## **11.0 Social and Affordable Housing**

### **11.1 Part V, Section 96 of the Planning and Development Act**

Part V, Section 96 of the Planning and Development Act 2000 (as amended), applies to this application. New provisions relating to Part V, under the Urban Regeneration and Housing Act 2015, were formally enacted on 1st September 2015. Since 31 August 2015, 2 guidance circulars have been issued by the Department and one Guideline under section 28 of the Planning and Development Act 2000:

#### **Circular Housing 33 of 2015 of 31 August 2015**

Urban Regeneration and Housing Act 2015 – amendments to the operation of Part V of the Planning and Development Act 2000.

#### **Circular PL 10/2015 and Housing 36/2015 of 30 November 2015**

Part V - Implementation of Article 22(2)(e) of the Planning and Development Regulations 2001, as amended – Validation of Planning Applications.

### **11.2 Part V Proposal**

The applicants propose to fulfil their Part V obligations for the proposed development by building and transferring 20 no. apartments to the ownership of the Planning Authority, or to the ownership of persons nominated by the authority. Please consult the Part V drawings, prepared by C + W O'Brien Architects, for specific details on the units proposed for construction/transfer.

This proposal has been approved by South Dublin County Council's Housing Department as per the enclosed letter dated 28<sup>th</sup> April 2022. The applicant has thus confirmed its willingness to enter into an agreement with South Dublin County Council, in respect of Part V (Social and Affordable Housing) should a grant of planning permission be forthcoming at the subject site, in accordance with the relevant provisions of Planning and Development Act 2000 (as amended).

## **12.0 Appropriate/Environmental Assessment**

Article 299B of the Planning and Development Regulations 2001-2019, as amended, outlines requirements in relation to environmental impact assessment for subthreshold development where no screening determination was made under section 7 of Act. Article 299B(1)(b)(ii)(II) and Article 299B(1)(c) of the Planning and Development Regulations 2001-2019, as amended, read as follows:

- (b) (i) The Board shall carry out a preliminary examination of, at the least, the nature, size or location of the development.  
.....
- (ii) Where the Board concludes, based on such preliminary examination, that—  
.....
- (II) there is significant and realistic doubt in regard to the likelihood of significant effects on the environment arising from the proposed development, it shall satisfy itself that the applicant has provided to the Board

- (A) the information specified in Schedule 7A,
  - (B) any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and
  - (C) a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.
- (c) The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.

Schedule 7A referred to in Article 299B(1)(b)(ii)(II)(A) reads as follows:

1. A description of the proposed development, including in particular— (a) a description of the physical characteristics of the whole proposed development and, where relevant, of demolition works, and (b) a description of the location of the proposed development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
  2. A description of the aspects of the environment likely to be significantly affected by the proposed development.
  3. A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from— (a) the expected residues and emissions and the production of waste, where relevant, and (b) the use of natural resources, in particular soil, land, water and biodiversity.
1. The compilation of the information at paragraphs 1 to 3 shall take into account, where relevant, the criteria set out in Schedule 7.

To assist with the Board determination, we provide the following information:

### 12.1 Appropriate Assessment

The EU Directive on the Conservation of Habitats, Flora and Fauna (92/43/EEC), commonly known as 'the Habitats Directive', was adopted in 1992, came into force in 1994 and was transposed into Irish law in 1997. The main aim of the Habitats Directive is to contribute towards the conservation of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status. These annexes list habitats (Annex I) and species (Annexes II, IV and V) which are considered threatened in the EU territory. With regards to effects on a European site, from analysis of the NPWS mapping system it was determined that the site of the proposed development and the corresponding grid connection is not located in a site of European importance (Natura 2000 Site).

The screening process has examined the details of the proposed residential development and has considered the conservation interests of a range of Natura 2000 sites within a 15km radius of the site. For full details please refer to the Appropriate Assessment Report prepared by Openfield Ecology.

### 12.2 Environmental Assessment

In accordance with Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended), an Environmental Impact Assessment Report is only required for infrastructural projects comprising of:

- *Construction of more than 500 dwelling units;*
- *Construction of a shopping centre with a gross floorspace exceeding 10,000 square metres;*  
*and*
- *Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up areas and 20 hectares elsewhere*

The development proposed for the subject site as part of this application comprises 197 no. dwelling units, a creche and an extent of commercial accommodation, and is therefore sub-threshold. As such, an Environmental Impact Assessment Report has not been prepared for this application.

An Environmental Impact Assessment Screening report has been prepared by Hughes Planning & Development Consultants and is enclosed with this application.

### 13.0 Conclusion

In conclusion, we submit that the proposal which comprises the demolition of an existing substation and the construction of a development comprising 197 no. residential units, a creche and 4 no. commercial units at Lands on Greenhills Road (north of Bancroft Park, south/west of Hibernian Industrial Estate and east of Airtown Road junction), Tallaght, Dublin 24, is considered to be acceptable and compliant with the policies and objectives as set out in the applicable national, regional and local planning policy context.

At a National and Regional level, this statement has demonstrated consistency with the following:

- Ireland 2040 - Our Plan National Planning Framework;
- Project Ireland 2040 National Development Plan 2018-2027;
- Urban Development and Building Heights - Guidelines for Planning Authorities (2020);
- Housing for All - A new Housing Plan for Ireland (2021);
- Quality Housing for Sustainable Communities - Guidelines for Planning Authorities (2007);
- Sustainable Residential Development in Urban Areas- Guidelines for Planning Authorities (2009);
- Urban Design Manual - A Best Practice Guide (2009);
- Regional Spatial and Economic Strategy (RSES) for Eastern and Midland Regional Assembly (2019);
- South Dublin Development Plan 2016-2022;
- Tallaght Town Centre Local Area Plan 2020-2026;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020); and,
- Guidelines for Planning Authorities on Childcare Facilities (2001).

Consistency is also demonstrated with the policies and provisions of the South Dublin Development Plan 2016-2022 and Tallaght Town Centre Local Area Plan 2020-2026, which are the key planning policy documents at a local level. It is also considered that the proposed scheme appropriately responds to the concerns voiced by South Dublin County Council in their report to An Bord Pleanála on the SHD application.

It is considered that the proposed development at this site on Greenhills Road presents an appropriately scaled mixed-use development on appropriately zoned land. It is also considered that the subject site, being located within close proximity to Tallaght town centre and strong public transport links to Dublin city centre, has the capacity to accommodate additional residential accommodation and respond to the current housing shortage.

The development has been designed to an exceptionally high standard to contribute to the urban form of the area and it is considered that the proposal will not give rise to any undue impacts on the amenity of any adjacent properties. We are of the opinion that the development is generally compliant and in accordance with the qualitative and quantitative standards as set out in the relevant statutory development plans and other national guidance documents.



Kevin Hughes MIPI MRTPI  
Director for HPDC Ltd.