



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

STATEMENT OF RESPONSE TO PRE-APPLICATION CONSULTATION OPINION

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 Response to Pre-application Consultation Opinion on behalf of our clients, 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.

Following consultations with South Dublin County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted, and a pre-planning consultation meeting was facilitated on the 14th of February 2022. An Bord Pleanála subsequently issued a Notice of Pre-Application Consultation Opinion on 27th January 2022 under ABP. Ref. 311753-22, which identified 3 no. items that required further consideration, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 3 no. items were 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 Planning and Development (Housing) and 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.*

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. Irish Water
2. National Transport Authority
3. South Dublin Childcare Committee

A copy of the current application has been sent to the prescribed bodies identified by the Board. Copies of the application cover letters are enclosed with the application.

2.0 Response to Issues Raised

The following sections of this document set out how the applicant and design team have addressed the 3 no. issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1 Item No. 1 – Proposed Tenure Mix

The Board required the following:

Further clarification of the documents as they relate to the nature of the development and the proposed tenure mix.

2.1.1 Applicants Response to Item No. 1

In response to Item No. 1 of the Board's opinion, in which further information was sought regarding the proposed tenure mix, it can be confirmed that the proposed development will comprise 197 no. build-to-sell units.

The proposal, as tabled at the tripartite meeting with the Board, comprised a mixture of build-to-rent and build-to-sell units. The revised scheme, now being build-to-sell, has resulted in a reconfiguration of the units mix with the scheme now providing 79 no. one bed, 105 no. two bed, and 13 no. three bed units. The proposal will have a commercial element at ground floor as well as a creche with associated ancillary playground. Please refer to architectural drawings and schedule of accommodation prepared by C+W O'Brien Architects, and the Statement of Consistency and Planning Report prepared by Hughes Planning and Development Consultants for further details on the unit mix, tenure mix and how they comply with the Apartment Guidelines.

2.2 Item No. 2 – Scale, Density and Building Height

The Board required the following in relation to the visual impact of the development of the proposed development:

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.

2.2.1 Applicants Response to Item No. 2

In response to Item No. 2, the Design Team further considered the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; the Urban Development and Building Heights Guidelines for Planning Authorities; and the Tallaght Local Area Plan 2020 to assess the suitability of the proposed development in terms of scale, height and density. The development submitted to the Board at the pre-planning stage comprised a development ranging in heights from 7 to 14 storeys and contained 236 no. apartments.

In response to the findings, the scheme has been revised and is now 8 storeys with a reduction in apartment numbers to 197 no. units. This represents a significant reduction in both height, scale and density on the subject site and when assessed against the Urban Development and Building Heights Guidelines for Planning Authorities and the Tallaght Town Centre LAP 2020, was considered a suitable design and scale for this location.

As per Specific Planning Policy Requirement 3 of the Urban Development and Building Heights Guidelines for Planning Authorities, the Board is permitted to allow heights in excess of the recommended heights listed in the development plan once they are satisfied the proposed height adheres to the Development Management Criteria listed in section 3.2 which states:

To support proposals at some or all of these scales, specific assessments may be required, and these may include:

- *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 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.*
- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*
- *An assessment that the proposal maintains safe air navigation.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.*

The subject application is accompanied by the following reports, consistent with the above requirements:

- An Appropriate Assessment Screening Report, prepared by Openfield Ecological Consultants;
- A Micro-climate Assessment prepared by AWN Consulting; and,
- A Sunlight, Daylight and Shadow Assessment Report, prepared by Passive Dynamics.

The guidelines state that applicants shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the development management criteria. We note the subject proposal's compliance with the development management criteria as follows:

2.2.1.1 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 proposed building 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 proposed development 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 new prospect of 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 the enclosed Statement of Consistency & Planning Report considers the proposed development 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.

2.2.1.2 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 proposal has been designed so as to ensure no undue impacts on existing residential amenity will occur as a result of the development, 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 immediate 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.

2.2.1.3 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.

2.2.1.4 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.

It is considered that Item No. 2 has been adequately addressed in this planning application and the proposed heights and density are appropriate for the site as shown in the table above which demonstrates how the proposed development satisfies the specified criteria set out in Specific Planning Policy Requirement 3 of the Height Guidelines.

2.3 Item No. 3 – Design Strategy – Vehicular Access

The Board required the following:

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.

2.3.1 Applicants Response to Item No. 3

In response to Item No. 3, we would herein confirm that the applicant does not retain to right to carry out improvement works on the access route into the site via Greenhills Road. Notwithstanding this, and as detailed in the enclosed Traffic & Transport Assessment report prepared by Jennings O'Donovan, it is considered that the access route is of sufficient design and capacity to accommodate the subject proposal and the extent of pedestrian, cyclist and vehicular traffic arising from same.

Section 3.2 'Existing Hibernian Industrial Estate Road / Development Access Road Junction' of the aforementioned report provides details on the existing access road whilst the wider report provides detailed information with regards to the capacity of this route, it is noted that that the Greenhills Road / Hibernian Industrial Estate Road junction will continue to operate within capacity in 2038, fifteen years after the development has opened, and will cater for traffic growth beyond 2038.

3.0 Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

3.1 Tenure Mix

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.

As noted, the scheme will comprise 197 no. build-to-sell units. The revised scheme, now being build-to-sell, has resulted in a reconfiguration of the units mix with the proposed development now providing 79 no. one bed, 105 no. two bed, and 13 no. three bed units. A Statement of Consistency, prepared by Hughes Planning and Development Consultants, and a Housing Quality Assessment, prepared by C+W O'Brien Architects have been prepared and submitted with this application. The proposed development complies, and indeed exceeds, with all the required standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

3.2 Management Plan

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.

A Services and Operations Management Plan has been prepared by Cushman Wakefield and submitted with this application. As noted, the proposed development does not include Build-to-Rent units, so this is not addressed in the report. Please refer to the Services and Operations Management Plan for further details.

3.3 Daylight, Sunlight, and Overshadowing Assessment

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.

The application is accompanied by a Daylight and Sunlight Report, prepared by Passive Dynamics. This report includes a sunlight/daylight/overshadowing assessment of the proposed development as well as the potential impact on surrounding properties. As stated previously, the aforementioned report assumes that 85.3% of combined kitchen/living/dining spaces across the 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.

3.4 Analysis of Wind Microclimate

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.

A Microclimate Analysis has been prepared by AWN Consulting and included with this application. The analysis concludes that the proposed development would have no significant effects with regard to microclimate.

3.5 Noise Impact Assessment

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.

A Noise Impact Assessment has been prepared by Amplitude Acoustics Consulting and included with this application. The Assessment concludes as follows:

The traffic noise at the site has been measured using a noise logger as well as attended measurements. A traffic noise model has been developed and calibrated using the

measured noise levels. The traffic noise model was modified to predict the 10-year forecast traffic noise levels based on a forecast traffic volume increase. The effect of lower traffic volumes due to Covid 19 restrictions has been considered and found to be marginal. Using the measured noise levels, the acoustic performance requirements for the building have been developed to achieve the internal noise levels defined in BS 8233 and ProPG.

Interior noise levels for the whole development are predicted to comply with interior noise level criteria (including both LAeq and LAFMax) from BS 8233 and ProPG provided that the construction requirements detailed in Section 6 are implemented. Sleep disturbance due to the predicted internal noise levels is unlikely to occur.

Balconies on the west elevations of Block A and B, north elevations of Block B and C and south elevation of Block A are predicted to exceed the desirable noise levels for external amenity spaces. Adequate alternate external spaces have been provided for the development through roof garden, open space and courtyard at ground level which comply with Element 3(v) of ProPG External Amenity Area Assessment. Nearby Bancroft Park also offers a large outdoor public park within a 5-minute walk from the development.

3.6 Aeronautical Assessment

An Aeronautical Assessment in respect of the proposed development.

An Aeronautical Assessment has been prepared by O'Dwyer Jones Design Partnership and included with this application.

3.7 Bus Connects

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.

Details on 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, have been provided in Drawing Nos. 20467-2-104 'Landscape Masterplan Ground Level Showing Bus Connects Route' prepared by C+W O'Brien. With regards to the responsibility for completing the necessary works to facilitate the Bus Connects Route, we would assume this responsibility falls upon the tendered contractor. The applicant will provide the extent of works as detailed on our site layout plan until such time as the Bus Connects proposal is implemented.

3.8 Additional Details

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.*

In response to Item No. 8 (a), A Traffic and Transport Assessment has been prepared by Jennings O'Donovan Consulting Engineers. The TTA has been written having regard to the proposed entrance into the site from the Hibernian Industrial Estate, and Bus Connects plans for the area.

In response to Item No. 8(b), a Mobility Management Plan has been prepared by Jennings O'Donovan Consulting Engineers.

In response to Item No. 8(c), a Parking Management Strategy has been prepared by Jennings O'Donovan Consulting Engineers.

In response to Item No. 8(d), a DMURS Statement has been prepared by Jennings O'Donovan Consulting Engineers whilst Road Safety and Quality Audits have been provided by Tent Engineering.

In response to Item No. 8(e), Details of the quantum and design of bicycle parking / storage, which accord with the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments, can be found in the Architectural Design Statement and Drawings prepared by C+W O'Brien Architects as well as the Traffic and Transport Assessment prepared by Jennings O'Donovan Consulting Engineers.

In response to Item No. 8(f), a Servicing and operations Management Plan has been prepared by Cushman Wakefield and included with this application.

3.9 Landscape and Visual Impact Assessment.

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.

A Landscape and Visual Impact Assessment has been prepared by Cunnane Stratton Reynolds Landscape Architects. The LVIA found that the proposed development will not negatively impact the landscape of the area.

3.10 Details of all materials proposed for buildings, open spaces, paved areas, boundary and landscaped areas.

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.

The Architectural Report and the sections and elevations included in C+W O'Brien Architects architectural drawing set indicate the materials and finishes proposed for the buildings and boundary treatments. Details of materials proposed for open spaces, paved areas and landscaped areas, are included in the Landscape Report and associated plans, prepared by Cunnane Stratton Reynolds Landscape Architects.

3.11 Building Lifecycle Report

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.

A Building Life Cycle Report has been prepared by C+W O'Brien Architects.

3.12 Site Layout Plan Identifying Areas to be taken in charge.

A site layout plan, which clearly identifies areas to be taken in charge, if any.

It is herein confirmed that no areas of the subject site are to be taken in charge by South Dublin County Council and, as such, no site layout plan has been prepared to illustrate lands taken in charge.

3.13 Material Contravention Statement

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.

The application is accompanied by a Statement of Material Contravention, prepared by Hughes Planning and Development Consultants, which justifies the proposed building height in the context of the provisions of Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).

3.14 Statement on Article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018

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 on Article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 has been prepared by AWN Consulting.

4.0 Conclusion

This report sets out how the various issues raised by An Bord Pleanála, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed residential and commercial development on Lands at Greenhills Road, Tallaght, Dublin 24. The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality residential development will be provided.

The proposed development has decreased in scale significantly since the pre-planning meeting with An Bord Pleanála. The proposed development now comprises 197 no. units, down from 236 no., while the maximum height on site has decreased to 8 no. storeys from 14 no. storeys. This reduction in units and heights has resulted in a reduced massing and is considered to align with the objectives of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas; Design Standards for New Apartments Guidelines for Planning Authorities; Urban Development and Building Heights Guidelines for Planning Authorities, and the Tallaght Town Centre LAP 2020.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.



Kevin Hughes MIPI MRTPI
Director for HPDC Ltd.