

**Statement of Response to
Pre-application Consultation
Opinion**

**Lands at Broomhill Road,
Tallaght, Dublin 24,
D24 XA52 and Unit 51 Broomhill Road,
Tallaght, Dublin 24, D24E124**

SHD – Residential & Mixed Use Development

**On behalf of
Garyaron Homes Ltd.**

May 2022



Planning & Development Consultants

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1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed to submit this application on behalf of Garyaron Homes Ltd, Unit H2, Merrywell Business Park, Lr Ballymount Road, Dublin 12 for a residential and mixed-use development proposal at a site at Broomhill Road, Tallaght, Dublin 24, and Unit 51 Broomhill Road, Tallaght, Dublin 24.

This report is a response to the issues raised in the An Bord Pleanála (ABP) Opinion dated February 2022 following the pre-application process and with regard to the consultation meeting for the application for a Strategic Housing Development on the subject site.

The Opinion states that ABP *'is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development'*.

The Opinion further states that the following specific information should be submitted:

1. A detailed rationale outlining how in the prospective applicant's opinion, the proposed predominantly residential development is in compliance with local planning policies, having specific regard to Objective BH1 of the Tallaght Town Centre LAP 2020.
2. Drawings and other documentation demonstrating how the proposed development will relate to, and facilitate future connections with, adjoining lands to the south and east and any potential future development thereof.
3. Drawings identifying the extent of clearly defined public open space and communal residential open space to be provided within the development.
4. A management plan which addresses the varied requirements of the proposed uses within the development, and the operation, management and maintenance of public open space on the site.
5. An assessment of the requirement for an Aeronautical Assessment in respect of the proposed development.
6. An assessment of the noise environment having regard to the surrounding pattern of land uses, in the context of providing adequate levels of residential amenity for future occupiers. Where appropriate, specific mitigation measures in this regard should be clearly identified and described in the application.
7. 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.
8. 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 have regard to the management and maintenance of public spaces and access routes to the development
9. Drawings which clearly identify the areas intended to be taken in charge by the Local Authority, if any.
10. A response to the matters raised in the South Dublin County Council Environmental Services report dated 05/11/2021.
11. A response to the matters raised in the South Dublin County Council Roads Department report dated 21/10/2021, including inter alia:
 - a) A Parking Management Strategy, including detail on the allocation of parking spaces by type and by land use.

- b) A Quality Audit in accordance with Advice Note 4 of DMURS. Such audit should consider the quality of pedestrian and cycle connections to services and amenities in the surrounding area.
 - c) Details of the quantum and design of bicycle parking / storage, having regard to the provisions of the guidelines on Sustainable Urban Housing: Design Standards for New Apartments. The design of such parking / storage should consider relevant access and operational requirements.
 - d) A Servicing and Operations Management Plan.
12. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.
 13. 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 response to each item as numbered 1 to 13 above accompany the application and are discussed in Section 2 of this report.

In addition, the following bodies have been notified of the application for the proposed development:

- Irish Water
- South Dublin County Childcare Committee
- NTA

2 Response to Specific Information Required

2.1 Introduction

We welcome the conclusion of the Board that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.

The following sections set out how the applicant has addressed An Bord Pleanála's request for specific additional information in respect of the proposed development.

Please note that these application documents include reference to the opinion of An Bord Pleanála given under section 6 of the Planning and Development (Housing) and Residential Tenancies Act 2016. The said opinion is a pre-condition to the making of a valid application direct to the Board. It will be published into the public domain by An Bord Pleanála. These references to the said opinion are made to establish the formal proofs for the making of a valid application and for narrative and historical context. Having regard to section 6(9) of the Act, no reliance whatsoever is placed on the said opinion for the purposes of this formal planning process.

2.2 Compliance with Local Planning Policy

An Bord Pleanála has requested a statement that specifically lists and considers consistency with the relevant Local Planning Policies having specific regard to Objective BH1 of the Tallaght Town Centre LAP 2020.

In relation to consistency with the relevant Local Planning Policy, we refer to the attached suite of reports by Brock McClure Planning and Development Consultants that includes a Statement of Consistency and Planning Report. The Statement of Consistency outlines how the subject proposal is consistent with all relevant Ministerial Guidelines and the South Dublin County Council Development Plan 2016-2022 as well as the Tallaght LAP 2020. The Planning Report and Statement of Consistency outlines consistency with any relevant Strategic Planning Policy to provide a comprehensive review of how the subject proposal complies with local and national planning objectives.

In response to the Board's comments in relation to the development proposed and the relationship to the REGEN zoning objective for the site we can now confirm that the subject proposal constitutes a mixed-use development with residential as the predominant use.

The Development Plan 'REGEN' zoning objective supports this strategy for development and states as follows:

“To facilitate enterprise and/or residential led regeneration.”

Objective BH1 of the Tallaght LAP states the following:

“Transition to mixed use area primarily focused on higher value commercial uses.”

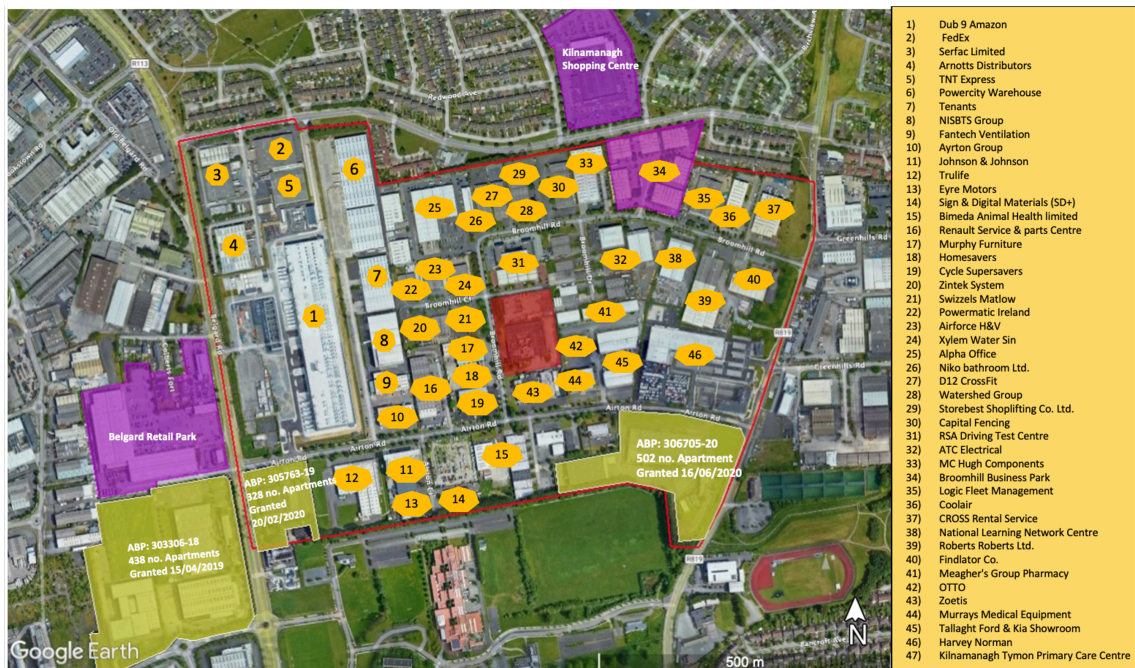
The subject proposal provides a mixed-use development incorporating residential, a public gym, a creche, public open space, a co-working space open to the public and a café. The proposed development is located in a light industrial/commercial area with a wide range of established commercial uses. The following analysis illustrates that the subject proposal provides an appropriate mix of uses within the LAP area that is well connected to surrounding land uses and services.

The subject proposal delivers fully on the zoning objective for the site as well as local planning policies comprising the following mix of uses:

- 242 Residential units
- A childcare facility of 465sqm
- A Café of 50.9sqm
- Co-working Space of 128.4sqm
- A public gym of 128.5sqm
- Rentable Studio of 39sqm
- Residential amenity areas including reception, residents lounge, letting office and open space

Furthermore, when considered with the range and number of various uses in the locality including sports clubs, retail (including The Square Shopping Centre), healthcare and community facilities it is considered that the subject proposal provides an appropriately balanced mix of uses in accordance with the zoning objective and applicable local planning policies for the site.

We refer the Board to the attached memo that provides a detailed review of the mix of uses in the immediate area and how the subject proposal is in compliance with Objective BH1. This analysis highlights that there are a number of established commercial uses in the surrounding area that facilitate a predominantly commercial led mix of uses in the area. The subject site would form only one of three residential sites in the Broomhill area which does not represent an over concentration of residential land uses in the area. The range of uses in the surrounding area is illustrated below.



Community Facilities within 1km of the site

We submit to An Bord Pleanala that the above details as well as the attached memo in Appendix 1 are sufficient to address Item 1 of the Further Information/Details to be submitted with the application.

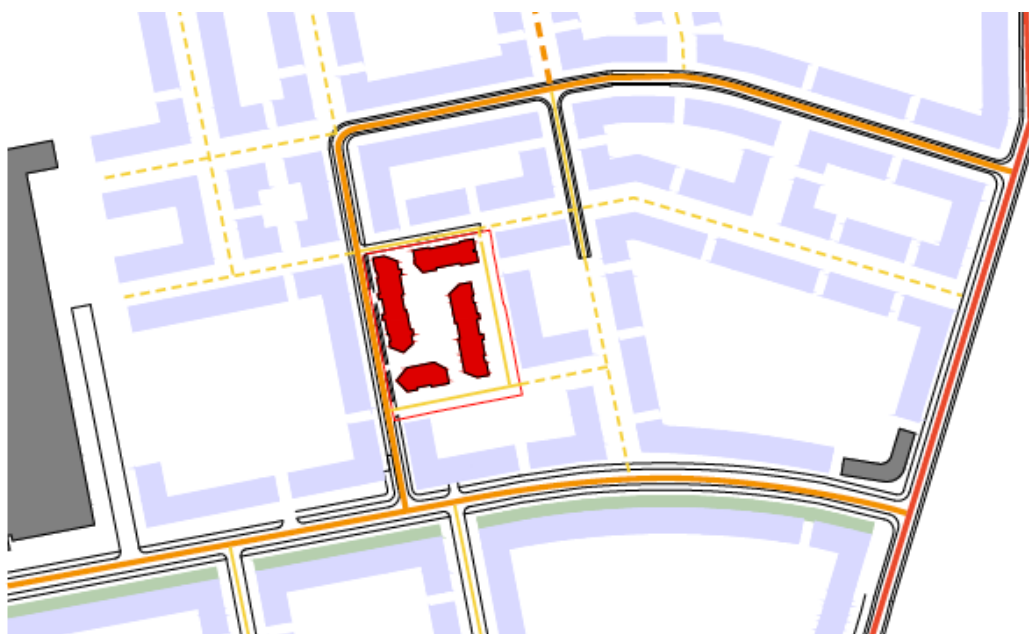
2.3 Connectivity & Public Open Space

An Bord Pleanála has requested drawings that the applicant demonstrates the proposed development’s capabilities to connect with future adjoining developments as well as drawings that clearly define public open space and communal open space to be provided within the development.

John Fleming Architects have provided a Design Statement which demonstrates excellent connectivity and high quality public and private open space provision. It has been indicated that a cycle link will be created at the east of the site to allow for a future connection to developments located here.

Figure 3.13 in the Tallaght Local Area Plan, in effect from 20th July 2020, shows a proposed plan for the future development of new roads and routes through the neighbourhood of Broomhill.

Below is an amended diagrammatic plan showing how the proposed development at Broomhill Road can integrate into the future development of the area. These connections are logical and consistent with the block form envisaged for the area in the Tallaght LAP.



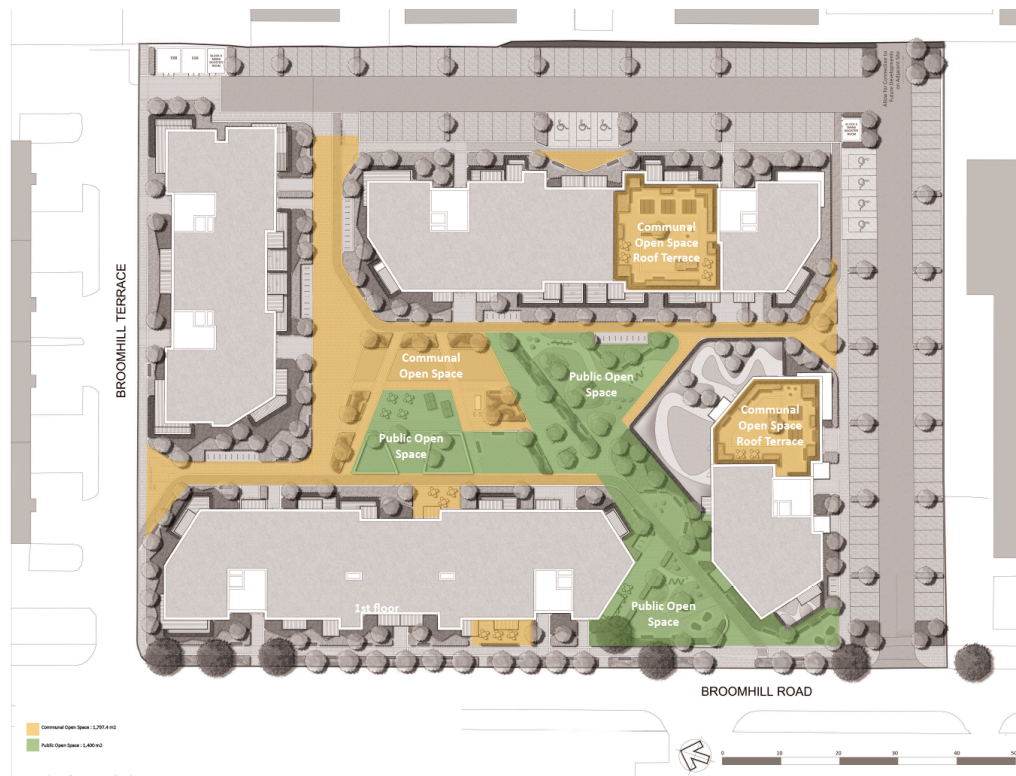
Proposed Development and Possible Connections to Future Development in Broomhill

The proposed development at Broomhill Road will include an on-site perimeter road for parking. This road can be used to connect into future developments to the south and east.

A hammerhead at the corner of the perimeter road will be included to allow for a future road to the east to connect to the road and for a connection to the wider Broomhill Road area across the site.

There is also a potential to connect to the existing Broomhill Terrace to the north if it is extended in the future. This would allow the proposed development to become part of a broader improved circulation network in Broomhill.

Public open space has been indicated by John Fleming architects and Park Hood landscape architects in the design statement and associated drawings and has been confirmed to meet the 10% requirement from South Dublin County Council for public open space in residential developments as well as meet the communal open space requirements for apartment developments (1,512sqm required). The ground floor plaza, play area and landscaped courtyard provides the 10% public open space that will be accessible to all. An additional 1,797sqm of communal open space is provided between ground floor level and two roof terraces at fourth and fifth floor level. The delineation of communal and public open spaces are shown below and in the attached drawings by John Fleming architects and Parkhood Landscape Architects.



Proposed Public and Communal Open Space

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 2 and 3 of the Further Information/Details to be submitted with the application.

2.4 Management Plan and Aeronautical & Noise Assessments

An Bord Pleanála has requested that a management plan along with aeronautical and noise assessments be provided for the submission of this planning application.

A management plan has been prepared by Brock McClure which addresses the varied requirements of the proposed uses within the development as well as the operation and management of open space. Details of the management plan will be confirmed with the ultimate occupier of the development, post planning.

An aeronautical assessment has been prepared by O'Dwyer & Jones Design Partnership in respect of the proposed development. This assessment indicates that there will be no adverse impact from the proposed development in relation to aeronautical operations in the area.

A noise assessment has been provided by AWN having regard to the surrounding pattern of land use. Appropriate mitigation measures have been identified within this document to ensure adequate levels of residential amenity which can be easily accommodated and are standard noise mitigation measures (glazing, wall construction) in modern apartment developments.

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 4, 5 & 6 of the Further Information/Details to be submitted with the application.

2.5 Materials and Finishes

We refer the Board to the attached Architectural Design Statement by John Fleming Architects that responds to the requirements for additional details on materials and finishes

within the proposed scheme. A number of high-quality materials are proposed within the scheme that provide a durable, high quality finish:

Material 1 | White Brick – Wienerberger Platinum White

The use of brick as the predominant material is a response to the suburban context and the surrounding built environment.

Brick provides a warm, human scale to the façade and provides a robust and long-lasting finish.

Material 2 | Dark Grey Brick – Forterra Blue Smooth

A secondary brick will express the articulation and the steps in the elevations and provide a rhythm along the block.

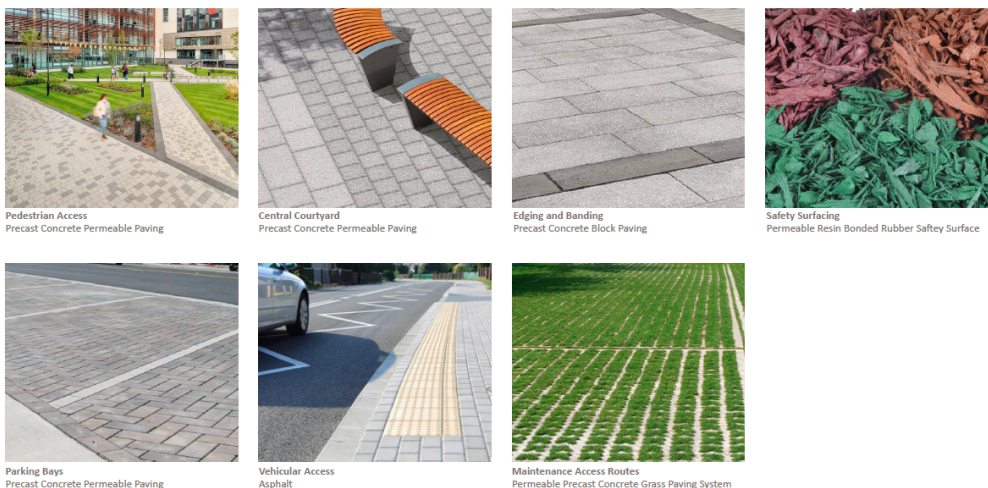
Material 3 | Dark Grey Brick Slips

For the detailed inset panels, a decorative brick feature will animate the facades.



Proposed Material Finishes

The Parkhood Landscape Plan illustrates the landscaping and paving strategy for the site as well as proposed boundary treatments. We refer the Board to the attached details from Parkhood for full details. A sample of the hard landscaping proposed is shown below.



Proposed Hard Landscaping Materials

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 7 of the Further Information/Details to be submitted with the application.

2.6 Building Lifecycle Report

An Bord Pleanála has requested that a Building Lifecycle Report be produced to accompany this SHD application. This document has been prepared by Brock McClure Planning and Development Consultants and considers external materials on elevations and has regard to the management and maintenance of public spaces and access routes to the development that will minimise costs for future occupiers.

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 8 of the Further Information/Details to be submitted with the application.

2.7 Taken In Charge Drawings

An Bord Pleanála has requested that drawings be prepared that identify areas intended to be taken in charge by the local authority. We confirm that no areas are proposed to be Taken-In-Charge in the proposed development but the courtyard area will be made fully available to the general public for use across the day.

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 9 of the Further Information/Details to be submitted with the application.

2.8 Response to SDCC - Environmental Services

An Bord Pleanála has requested that a response to the matters raised in the South Dublin County Council Environmental Services Report dated 05/11/2021 be submitted within this document. The following responses and the attached report from Kavanagh Burke address these queries.

Surface Water Report: Comments:

Observation

It is unclear why the applicant has proposed a new manhole on the existing 450mm public surface water sewer west of the development when there is an existing manhole immediately downstream of same. The applicant is requested to submit a revised surface water drainage layout drawing showing the surface water drainage from the proposed development is discharging into an existing manhole on this surface water sewer.

Response

As per the attached details from Kavanagh Burke Consulting Engineers, Storm Water connection to the existing manhole are now proposed.

Observation

The applicant is required to include further Sustainable Drainage Systems (SuDS) in the proposed development such as but not limited to the following:

- Tree pits included in parking areas
- Rainwater harvesting systems
- Swales, Rain Gardens and Detention basins etc in central public plaza areas

Response

As set out in the attached Kavanagh Burke Report extensive SuDS measures are incorporated into the site including pervious paving, extensive green roofs, bio retention area and irrigation tree pits, swales and rain gardens as also described in the Landscape Plan by Parkhood Landscape Architects. Rainwater harvesting is to be evaluated at detailed design stage as per the M&E Report by EDP attached and as is standard practice.

Observation

The applicant shall submit a revised Surface Water Drainage layout drawing showing the further inclusion of SuDS and how these are integrated into the surface water drainage network on site.

Note: Underground attenuation systems should be considered only as a last resort after all other SuDS features have been explored.

Response

All SUDS items as described are shown on the drainage layout drawing by Kavanagh burke

Due to the objectives for the development all Storm Water could not be disposed of on-site. To limit the runoff from the site and to protect the receiving Storm Water network attenuation is proposed. Underground attenuation was chosen as ponds would sterilize extensive areas within the site which would limit the available land for development and limit achievable densities within the site.

Observation

The applicant is requested to submit cross section details of all proposed SuDS features for the proposed development such as Porous surfaces, Tree pits, Swales, Rain Gardens, Green roofs, Detention basins and Rainwater harvesting systems.

Response

A Cross section of all SUDS devices are included in the Parkhood Landscape architect drawing 7116-PHL-XX-XX-DR-L-2900 (attached to the application documentation)

Flood Risk Report and Comments: No objection:

Observation

- The Developer shall ensure that there is complete separation of the foul and surface water drainage systems within the site, both in respect of installation and use.
- All new precast surface water manholes shall have a minimum thickness surround of 150mm Concrete Class B.
- All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works.

Response

As confirmed in the attached details by Kavanagh Burke, all Storm Water and foul systems are fully separate networks and will comply with the Irish Water codes of practice and Greater Dublin Regional code of practice for Drainage Works.

2.9 Response to SDCC – Public Realm

For the purposes of completeness a response to the comments from SDCC Public Realm Department dated 8th November 2021 are provided below.

Observation

All public open spaces shall be of a high quality in terms of design and layout, be located in such a manner as to ensure informal supervision by residents and be visually and functionally accessible to the maximum number of residential units.

Response

All residential blocks ensure informal supervision of open space. This is displayed in supporting documentation by John Fleming Architects.

Observation

Development proposals shall demonstrate that the communal open space:

- will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics
- is secure for residents and benefits from passive surveillance
- considers the needs of children in particular in terms of safety and supervision. For larger schemes play areas for older children and young teenagers should be provided.
- is wheelchair accessible
- achieves good sunlight penetration has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections

Response

This has been addressed within supporting landscaping documentation provided by Park Hood Landscape Architects. The proposal includes a variety of hard and soft landscaping that is passively surveyed by the majority of residential units in the proposal. Children's play areas are provided within the public areas as well as within the proposed creche. The sunlight and daylight analysis by 3D Design Bureau confirms that the public spaces receive adequate sunlight and daylight that complies with standard requirements.

Observation

Open space design with developments shall:

- include well-located public spaces that support a wide variety of activities and encourage social interaction, to promote health, well-being, social and civic inclusion;
- have a hierarchy of spaces that range from large and strategic to small and local spaces, including parks, squares, greens and pocket parks;
- have public spaces that feel safe, secure and attractive for all to use; and have trees and other planting within public spaces for people to enjoy, whilst also providing shading, and air quality and climate change mitigation

Response

This development includes open space which is central to the scheme as well as available to the public including areas for sitting and walking. These spaces include opportunities for play which are safe and benefit from passive residential surveillance. Outdoor seating is provided for the public café and public co-working space. All of these facilities combine to provide a cohesive public space that provides a useful amenity for the subject proposal and locality alike.

Observation

It is not clear from the information submitted if the proposed brown, biodiverse, wildflower and extensive green roofs will be available and accessible to residents. If these roof areas are accessible to residents, then the Public Realm Section would have concerns regarding the usability, functionality amenity value and enjoyment of these areas by residents considering they are located roof heights between 4 to 7 storeys high. The Public Realm Section welcomes the proposals that some of the rooftops will be designated to enhance biodiversity in the development, proposals include a mixture of brown roofs, wildflower roofs and extensive green roofs.

Response

Information regarding access to roof terraces has been provided by John Fleming Architects and Park Hood Landscape Architects and accompanies this application. Two areas of rooftop are proposed to provide communal open space within the development and to meet standard requirements. The graphic below illustrates the proposed roof top terraces.

The remaining rooftop space will be green roofs that are not accessible. These will contribute to the amenity and biodiversity values of the proposal and we trust this clarifies the situation for the Planning Authority.

Observation

Additional details, specifications and images need to be provided in relation to the proposed play area with the public open space areas of the development. All play equipment should be of predominantly natural materials with unstructured play included in the proposed design.

Response

Design features of the play areas provided in this scheme have been provided by John Fleming Architects within the Design Statement as well as in the attached details from

Parkhood Landscape Architects. This scheme includes play areas, enclosed play areas and a natural play area.

Observation

The Public Realm Sections welcomes the proposed strategies to promote and enhance the biodiversity in the development, the strategies to be considered by the applicant include:

- Green roofs
- Hedges
- Pollinators

Response

The proposed scheme includes all three of these strategies. Please refer to documentation produced by Park Hood Landscape Architects for full details.

Observation

Specific Mitigation/Compensation Measures should be proposed by the applicant to compensate for those trees being removed in order to accommodate the proposed development.

Response

This application proposes to compensate for the removal of trees along Broomhill Road. Details of this can be found in documentation produced by Park Hood Landscape Architects and Arbor care. Any trees to be removed are not considered to be of any exceptional quality and a comprehensive landscape masterplan is proposed to compensate for any losses.

Observation

All approved tree works are to be completed by suitably qualified and insured contractors and must take place before protective fencing is installed and any Site works begin. Prior to the commencement of any tree works a thorough check for protected species (including nesting birds, bats and badgers) is to be undertaken. If evidence of any protected species is discovered the advice of a suitably qualified ecologist must be obtained. Tree works are to be undertaken outside of the typical nesting bird season (March to September) outside of this period any individual trees will be inspected for evidence of nesting birds by a suitably qualified person prior to works being carried out.

Where retained trees are at risk of damage, the default position as set out by BS 5837:2012 is that retained trees must be protected from construction operations with the erection of robust protective fencing positioned on the outer edge of the RPA or crown spread (whichever is greatest). All site operations will be restricted to the area outside of tree protection fencing and this area will form a Construction Exclusion Zone (CEZ) unless agreed otherwise. Protection measures will be installed as set out in the Tree Protection Plan. Fencing shall be constructed with robust vertical and horizontal scaffold framework with weldmesh panels firmly attached in accordance with BS 5837:2012 Figure 2. Vertical support poles and bracing poles must be located with care to avoid underground utility services and will be sited to avoid the structural roots of retained trees. Where driven supports are not feasible due to the presence of roots or underground utilities block trays, counterweights or equivalent can be utilised. Suitable all-weather signage will be fixed to fencing to notify site staff and visitors of the construction exclusion zone and its purpose. Protective fencing and ground protection shall stay in place until all construction operations are completed.

Response

Details of tree works within this proposal can be found in documentation produced by Park Hood Landscape Architects and Arbor care. Due care and caution will be undertaken in the treatment and removal of any trees in line with standard requirements.

Observation

The Landscape proposals shall include site-specific enhancements to achieve biodiversity net gains. Green corridors can be used to extend and enhance existing ecosystems. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. The development proposals shall include a network of multifunctional green space, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. The Public Realm Section welcomes the provision of the following SUDS features within the development proposals:

- Permeable paving
- Rain Gardens
- Tree pits

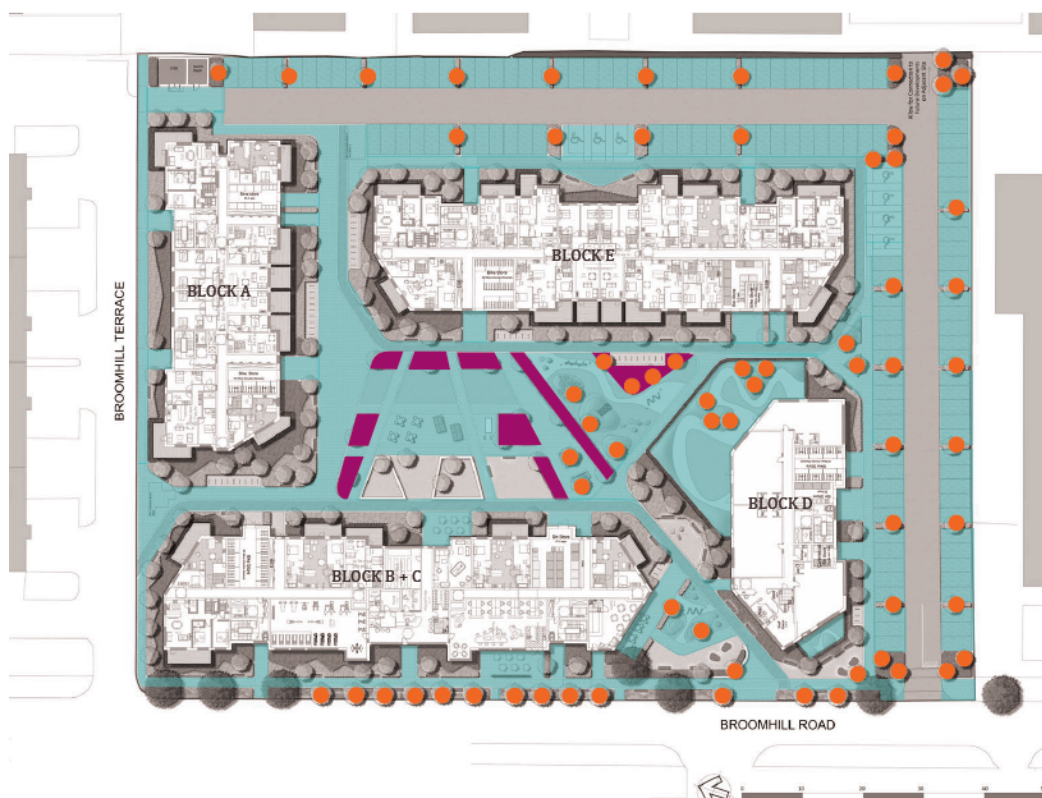
A SuDS strategy should be developed for the proposed development which takes account of quantity, quality, and amenity issues. The SuDS features proposed should provide intrinsically attractive features and focal points within the landscape and have added ecological value; by incorporating these features into open public spaces members of the public can enjoy a variety of diverse ecological features. The design of SuDS features is required to be of high quality to achieve a multifunctional space for amenity, biodiversity and surface water management. The proposed SuDs features should aid the maintenance of the existing greenfield runoff rates or potentially reduce the amount of surface water entering the piped surface water system. The applicant should have cognizance of the broader green/blue infrastructure network within the local area and how the landscape proposals for this development will interconnect with the wider existing green/blue infrastructure and proposed GI network contained within the Tallaght Town Centre Local Area Plan 2020-2026.

Where possible in addition to the SUDS features proposed the applicant should provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

Response

Details of landscaping and proposed SUDS can be found in documentation produced by Park Hood Landscape Architects and Kavanagh Burke Consulting Engineers. The below graphic contained in the Parkhood Landscape Plan illustrates areas of permeable paving (blue) Bio retention areas (purple) and Tree pits (orange).



Sustainable Urban Drainage Systems

Observation

- Planting should be predominantly native and pollinator friendly where possible, street trees to be minimum 18-20cm girth and open space trees to be 20-25cm girth, specimen/support trees should ideally be 30-35cm girth. Street trees where possible should contain SUDS features and be planted within the public realm.
- The applicant should have suitable tree pits that attenuate water within hard surface areas. The applicant should clearly outline how SuDS features within the tree pits will function. Details of constructed/bio retention tree pits to be used to be provided.
- The applicant is requested to submit a fully detailed Planting Plan for the entire development.
- The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.
- Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting schemes.

Response

Details of planting within this proposal can be found in documentation produced by Park Hood Landscape Architects in the attached Landscape Design and Access Statement

Observation

The appointed Landscape architects for the proposed development should apply universal design principles to create more inclusive spaces within the landscape proposals.

Response

This scheme proposes communal spaces including a courtyard and two rooftop terraces. Details of inclusive spaces within this proposal can be found in documentation produced by Park Hood Landscape Architects and in the Design Statement by John Fleming Architects.

Observation

The site shall be landscaped in accordance with a detailed comprehensive scheme of landscaping, details of which shall be submitted to and agreed in writing with the Public Realm Section.

- A fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The landscape Plan shall include hard and soft landscaping including levels, sections and elevations, detailed design of SUDs features including swales and integrated tree pits.

In addition, the following information as part of the landscape proposals should be provided and agreed with the Public Realm Section:

- Playground facilities should be designed around the principles of natural play. Details to be agreed with the public Realm section of South Dublin County Council
- Planting and hardscape details for public open space to be detailed and agreed with the Public Realm Section of South Dublin County Council.
- Planting should include use of native species and pollinator friendly planting; to be detailed and agreed with the Public Realm Section of South Dublin County Council.
- Details of tree planting pits to include SUDs measures in urban tree pits and use of urban tree soil to be submitted to the Public Realm Section of SDCC for agreement.
- The applicant is requested to submit a fully detailed Planting Plan for the entire development. The planting plan should provide the following information:
 - Location of species types, schedule of plants noting species, planting sizes and proposed numbers/densities where appropriate
 - Implementation timetables.
 - Detailed proposals for the future maintenance/management of all landscaped areas
- Trees shall be a mixture of 18-20cm, 20-25cm and 30-35cm girth to create a mature setting for the development.
- Planting material where possible should be Irish Grown Nursey Stock and the importation of foreign planting material should be avoided within the proposed planting schemes.

Response

A full comprehensive landscaping scheme which includes SUDS, opportunities for play, appropriate planting and trees has been produced by Park Hood Landscape Architects and is attached to the application for the full review of An Bord Pleanála.

Observation

The Applicant/Developer shall provide a strong and legible hierarchy and rationale for the open spaces provided as part of this proposed development, with different types of open space provided for in accordance with policies H12, objective 2. The layout needs to clarify the type of open space and access routes (defined as public or communal for residents) and shall be designed accordingly. The applicant shall provide further details in this regard.

Response

This scheme includes multiple types of open space which serves both the public and the residential community in the form of a courtyard and two rooftop terraces. These spaces have been allocated according to supporting documentation by Joh Fleming Architects and Park Hood Landscape Architects.

Observation

Pedestrian access to the public open space areas shall be permanent, open 24 hours a day, with no gates or security barriers at the entrances to the development. In addition, areas designated as Public Open Space within the development should not contain undercroft areas or be designed in such a manner which would restrict pedestrian access between the public open space areas.

Prior to the occupation of any residential unit, the developer shall ensure that the public realm areas and new routes, as outlined in the site layout plan and landscape drawings shall be fully completed and open to the public.

Response

The open space provided at ground floor level of this proposal will be made accessible to the public at all times. There are no undercroft areas proposed within this development. All open space will be completed upon the occupation of any residential units. We refer the Planning Authority to the attached details from Parkhood Landscape Architects for full particulars of the areas proposed.

Observation

Details of play proposals to be agreed with Public Realm. Play proposals should include accessible play features. All play equipment should be of predominantly natural materials with unstructured play included in the proposed design. Details of all play equipment, and safety surface, along with specifications and proof that all equipment conforms to *European Standards EN 1176-1-11* and *EN 1177 Playground equipment and surfacing* shall be submitted prior to the commencement of development. Post installation certification by the Royal Society for the Prevention of Accidents will also be a requirement. An Indicative Play Map showing types of play and age groups catered for shall also be submitted.

Response

Details of play equipment in designated play areas and natural play areas are detailed within supporting documentation from Park Hood Landscape Architects and John Fleming Architects. All requirements in relation to play equipment have been met within the scheme.

Observation

A comprehensive SUDS management Plan shall be submitted and agreed in writing by SDCC Public Realm Section to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. This shall be submitted and agreed with SDCC Public Realm Section prior to the commencement of any development. Underground tanks and storage systems will not be accepted under public open space, as a part of a SUDS solution. Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as rain gardens, detention basins, filter drains, permeable paving etc. In addition, the applicant should provide the following:

- Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

Response

All drainage requirements have been met within this scheme. Please refer to supporting documentation by JBA Consulting.

Observation

All areas proposed for taking in charge shall be to a taking in charge standard that ensures ease of maintenance. The applicant should provide a map outlining the areas of public open space proposed to be taken in charge by SDCC and should also include any phasing provisions which will apply to the public open space.

Response

Public open space has been identified within drawings provided by John Fleming Architects and Park Hood Landscape Architects. It is not proposed that any areas will be taken in charge at this stage.

Observation

Pursuant to Green Infrastructure Policy G5 -Sustainable Urban Drainage Systems and Objective G5 1 and G5 2 in the Couth Dublin County Council Development Plan and Chapter 7 – Infrastructure and Environmental Planning, the applicant is requested to revisit the design and layout of the proposed development and to submit revised plans and particulars to include the following:

- i. Demonstrate how natural SUDS features can be incorporated into the design of the proposed development
- ii. Natural SUDS Features including permeable paving to be used throughout the site.

Response

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 10 of the Further Information/Details to be submitted with the application. Details from Kavanagh Burke Consulting Engineers and Parkhood Landscape Architects provide confirmation of SuDS measures incorporate into the development. We trust this is to the satisfaction of the Local Authority.

2.10 Response to SDCC - Roads Department

An Bord Pleanála has requested that a response to the matters raised in the South Dublin County Council Roads Department Report dated 21/10/2021 be submitted within this document. The following responses address these queries.

Observation

A masterplan is required to ensure a coordinated approach to the proposed development. It is important to understand how the design will fit in relation to future neighbouring developments. It is important to maximise the pedestrian, cyclist, and vehicular permeability throughout the site and to the wider masterplan area. A design of the road, footpath and cycle lane for the development in line with the LAP for Tallaght is required.

Response

This information has been provided by John Fleming Architects within the design statement as well as by NRB Consultants within the Transportation Assessment.

Observation

SDCC recommends a ratio of 0.65 for the residential element of this development. Please note that the commercial car parking element is seen as complementary to the residential spaces that are provided above.

Response

The residential element of this development well exceeds this figure and is the dominant land usage.

Observation

The main vehicular access and egress road onto Broomhill Road shall be 6.0m wide with a 1.8m wide pedestrian footpath.

Response

This information has been provided by NRB within the Transportation Assessment.

Observation

The applicant will be required to submit a swept path / Auto track analysis of large cars particularly at parking through the entire site.

Response

This information has been provided by NRB within the Transportation Assessment.

Observation

The car parking size should be 5.0m x 2.5m with 6m reversing distance to help access and egress from the parking spaces. Prior to construction a revised layout showing parking spaces of 2.5m x 5.0m must be agreed in writing with the roads department and a copy filed with the planning department.

Response

This information has been provided by NRB within the Transportation Assessment.

Observation

The applicant shall provide a 10% of the overall vehicular parking spaces to be equipped with electrical charging points.

Response

10% of the overall vehicular parking spaces have been proposed to include electrical charging points. This information has been provided by NRB within the Transportation Assessment.

Observation

SDCC required a mobility impaired provision of 5% of total car parking spaces.

Response

This development is proposing 7 accessible car parking spaces. This information has been provided by NRB within the Transportation Assessment as well as by John Fleming Architects.

Observation

The proposed development shall make provision for the charging of electric vehicles. 100% of surface car parking spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points, and 10% of surface car parking spaces must be provided with electric vehicle charging points initially. Details of how it is

proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. REASON: In the interest of sustainable transport.

Response

All surface car parking spaces have been provided with electrical ducting and termination points to allow for the provision of future charging points. Details of this as well as proposed charging ports are included within a Transportation Assessment by NRB.

Observation

Bicycle parking provision is to be to 2018 Apartment Guidelines which is satisfactory. However, all spaces including visitor spaces are recommended to be covered spaces to encourage this mode of travel.

Response

Bicycle parking spaces are proposed to be located internally as well as some visitor parking spaces to be located externally within the open public space of the development.

Observation

The applicant shall submit stage 1 Road safety audit for the proposed development.

Response

This has been provided by NRB and accompanies this application.

Observation

The applicant is requested to submit details of the pedestrian routes within the development.

Response

This has been provided by NRB within the Transportation Assessment which accompanies this application.

Observation

A Mobility Management Plan is to be completed within six months of opening of the proposed development. The Mobility Management Plan shall be agreed in writing with the roads department and the agreed plan, along with the written agreement of the roads department shall be lodged to the planning file. The written commitment of the developer to implement the agreed plan shall also be lodged to the file. REASON: In the interest of sustainable transport.

Response

The client has agreed to complete a Mobility Management Plan within six months of opening of the proposed development.

Observation

The management of bin storage needs to be set out clearly.

Response

John Fleming Architects have clearly set out that the storage of bins is to be located at designated internal facilities within each block with direct exterior access.

Observation

Proposed pedestrian and cycle access between Broomhill Terrace and Airton Road at the southern end of the proposed development shall be improved.

Response

A cycle link has been proposed between the subject site and lands to the east of the site for future development. This can be seen in supporting documentation provided by John Fleming Architects.

Observation

Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department.

Response

An agreed Lighting Scheme has been provided by EDP which accompanies this application.

Observation

All items and areas for taking in charge shall be undertaken to a taking in charge standard. Prior to development the applicant shall submit construction details of all items to be taken in charge. No development shall take place until these items have been agreed.

Response

There are no areas for taking in charge included within this application.

Observation

Prior to commencement a developed Construction Demolition and Waste Management Plan shall be agreed by SDCC and lodged on the planning file.

Response

A Construction and Demolition Management Plan has been prepared by AWN and accompanies this application.

Observation

The footpath at the existing entrance is to be continued and made good when the access point is closed. The footpath and grass verge shall match the existing and in line with SDCC taking in charge standards.

Response

Park Hood Landscape Architects have provided details regarding public footpath and the intention to match existing pathways. Please see the Landscape Design Statement provided

Observation

The proposal shall include the upgrade of local cycle facilities along the frontage of the site.

Response

There are no current proposals to improve cycle facilities along Broomhill Road.

Observation

A Parking management Strategy shall be included, also including detail on the allocation of parking spaces by type and by land use.

Response

A Parking Management Strategy has been prepared by NRB and can be found in supporting documentation for this application. All parking for this scheme is located at surface level to the south and east of the subject site.

Observation

A Quality Audit shall be included in accordance with Advice Note 4 of DMURS. Such Audit should consider the quality of pedestrian and cycle connections to services and amenities in the surrounding area.

Response

NRB have prepared this audit. It can be found within this application. Pedestrian and cycle connections have been considered.

Observation

In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.

Response

This Statement of Consistency has been prepared by Brock McClure and accompanies this application. This statement addresses the scheme with regard to the current South Dublin County Council Development Plan as well as other strategic guidance.

Observation

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.

Response

Malachy Walsh has prepared a Section 299B Statement which accompanies this application. In this statement reference to article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 is made.

We submit to An Bord Pleanála that the above details as well as associated documentation provided within this application are sufficient to address Item 11 of the Further Information/Details to be submitted with the application.

2.11 Public Body Responses

An Bord has requested the following specific authorities should be notified of any application for permission:

- Irish Water
- South Dublin County Childcare Committee
- NTA

The above authorities have been formally notified in accordance with relevant legislation. Copies of the letters sent to these authorities is attached to the application documentation.

3 Conclusion

We trust that the above report and enclosed documentation address the issues raised in An Bord Pleanála's Opinion. All relevant details are further addressed in the revised design, now proposed and we ask The Board to refer to the complete application package for full details of the proposal now put forward.



Planning & Development Consultants

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086 8217900

To: An Bord Pleanala
From: Brock McClure
Date: April 2022
Re: **Response to Opinion – Item 1**

Introduction

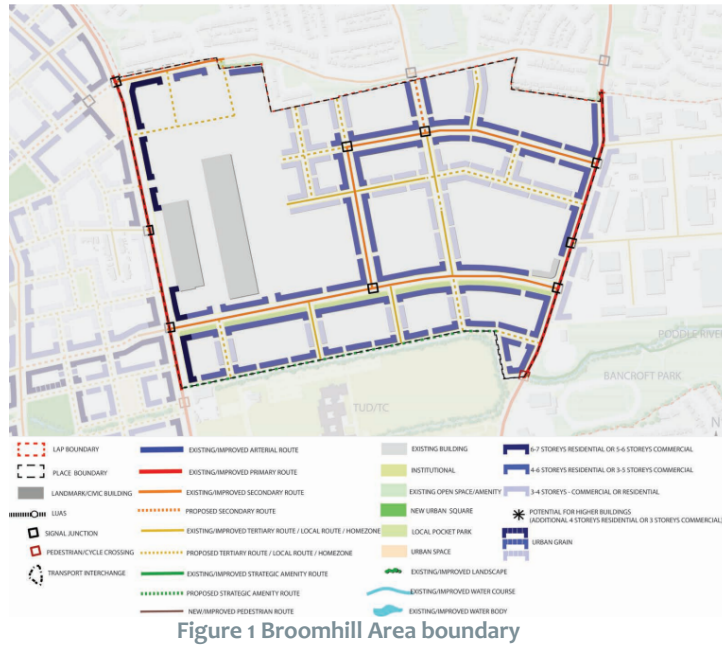
We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin prepared this land use study on behalf of Garyaron Homes, Unit H2, Merrywell Business Park, Lower Ballymount Road, Dublin 12, D12XR3 to address item 1 of the An Bord Pleanala Opinion on the proposed SHD development at Broomhill Road, Tallaght, Dublin 24.

This memo is in response to Item no. 1 of the issues raised by the An Bord Pleanala (ABP) opinion dated 14/02/2022 following the pre-application process and with regard to the consultation meeting for the application for a strategic Housing Development on the subject site.

Item 1 of the opinion for the application ABP-311725-21 states the following specific information should be submitted with any application for permission:

“A detailed rationale outlining how in the prospective applicant’s opinion, the proposed predominantly residential development is in compliance with local planning policies, having specific regard to Objective BH1 of the Tallaght Town Centre LAP 2022.”





Objective BH1 of the Tallaght LAP states the following:

“Transition to mixed use area primarily focused on higher value commercial uses.”

The subject proposal provides a mixed use development incorporating residential, a public gym, a creche, public open space, a co-working space open to the public and a café. The proposed development is located in a light industrial commercial area with a wide range of established commercial uses. The following analysis illustrates that the subject proposal provides an appropriate mix of uses within the LAP area that is well connected to surrounding land uses and services.

Existing Landuse

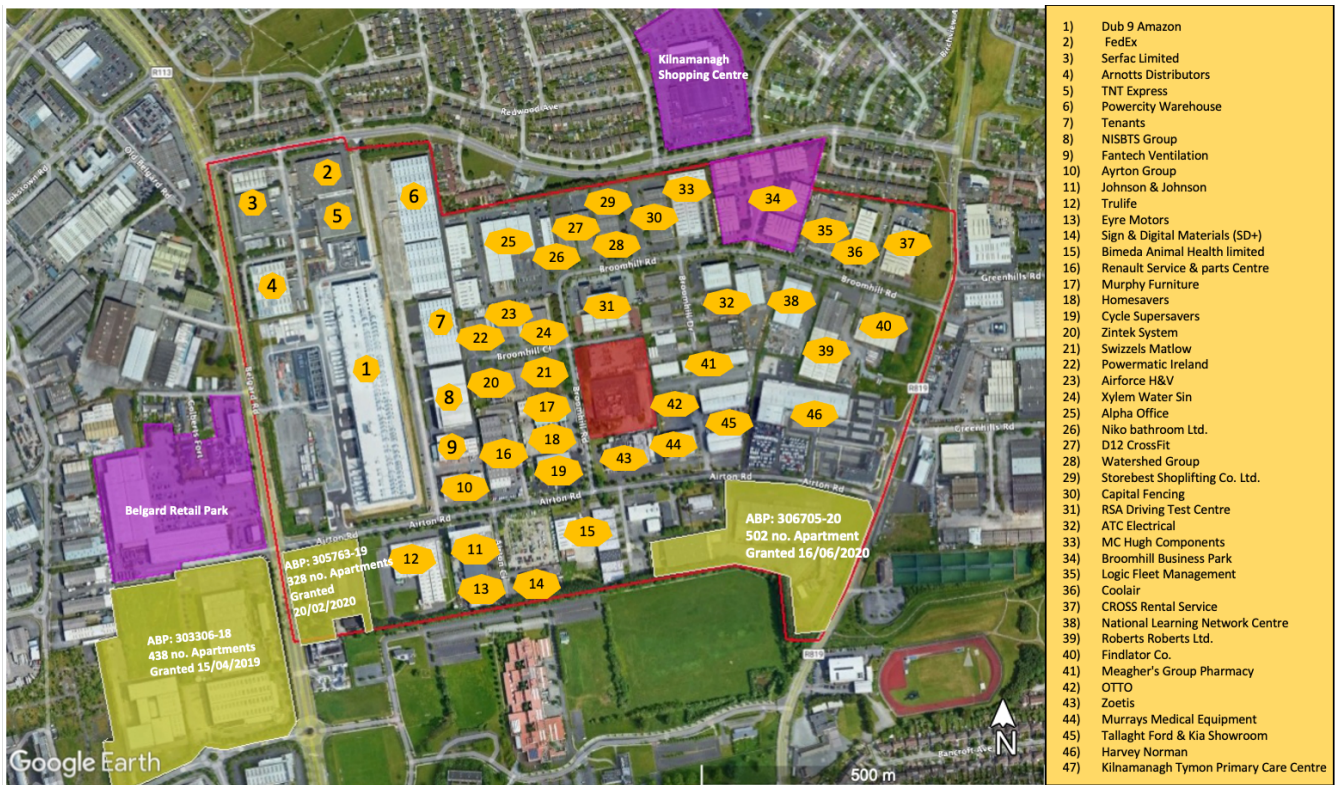


Figure 2 Existing Landuse in Broomhill Area

Figure 2 provides a landuse survey for the Broomhill area which illustrates a broad range of commercial uses in the Broomhill precinct of the Tallaght LAP. Emerging residential land uses have been granted permission and are commencing development in the near future. The LAP seeks to deliver high quality housing and well connected areas and the subject proposal contributes to these requirements directly. It is reasonable to assume that the proposed residential development is only a small fraction of land use in the Broomhill area which would contribute to the appropriate mix in the context of wider Tallaght LAP land. Section 2.8 of the Tallaght LAP notes the following:

“Development will arise, in the most part, due to the redevelopment of existing brownfield sites, influenced by market conditions, development viability and other matters outside of the control of the Council.”

Residential development will utilise an existing vacant plot of land in a well established light industrial and commercial area. A residentially lead development will assist in promoting more intensive and high quality of mixed use and accommodate a sustainable residential population. A breakdown of the land uses across the Broomhill area are shown below.

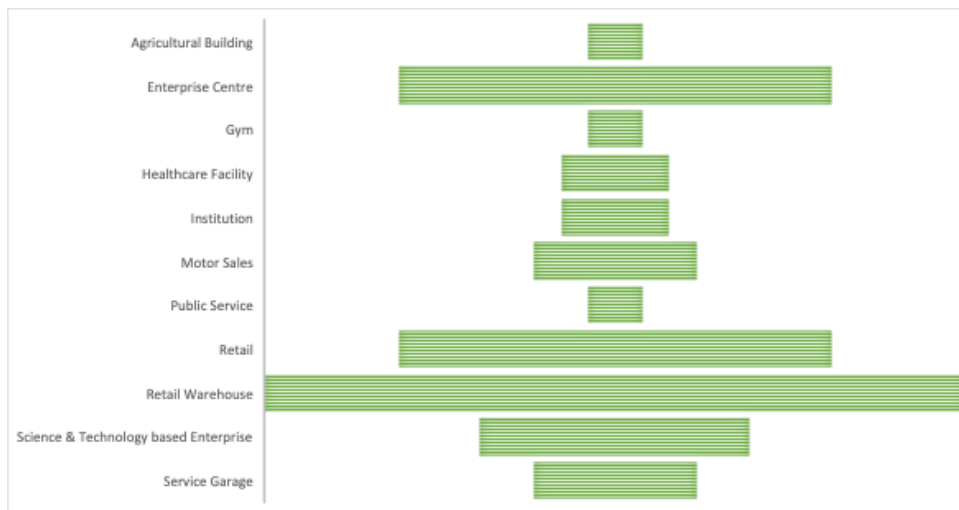
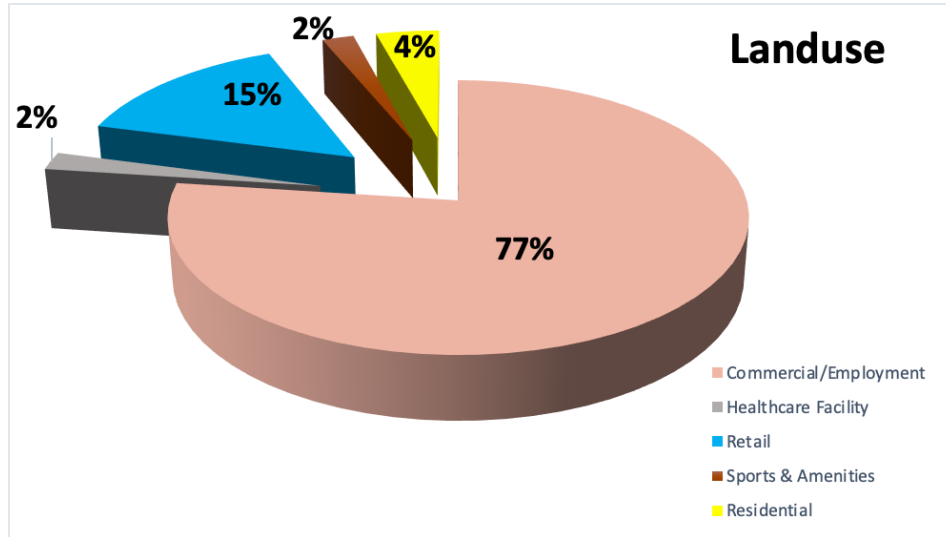


Figure 3 Landuse in the Broomhill Area

Figure 3 illustrates the urban function in the area. It is observed that approximately 77% are categorized under commercial/employment enterprise usage while 15% are in retail usage. Many of these uses are well established businesses with no immediate indication that they will be replaced in the near future. The subject site is located in an attractive consolidated, diversified and intensified place for business and employment that is well connected to surrounding places. Residential development is justified in

this location on the low frequency of sites that have become available in recent years. The subject industrial premises has been idle for a number of years, which indicates the demand for these type of units is low at this location. Given the connections to education facilities (Technical University Tallaght), Parklands (Bancroft, Tymon), Tallaght Town Centre, Public Transport and numerous employment opportunities in the immediate area, the subject proposal promotes sustainable development practices and should be promoted on the limited vacant sites in this locality to provide the residential mix required to provide the critical mass for regenerating the area.

Recently, An Bord Pleanála has granted 3 residential developments along the southern side of Airton Road. This supports the nature of the surrounding area, and the subject site, as suitable for residential development with wider streets, well landscaped with provisions for pedestrians and well connected to the surrounding area. It is notable that the subject site is less than 100m to the north of Airton Road where residential developments have been granted permission in the recent past.

In terms of activity type in the Broomhill area, it is observed that the majority of buildings are retail warehouse type (27.66%), followed by the enterprise centre (17.02%) and retail (17.02%) type. While these may not all provide direct employment opportunities for residents of the proposed development, a predominantly commercial land use mix is evident, and will be enhanced through the provision of much needed residential unit supply along with the mix of uses proposed in the development that will enhance the local area.

It can be seen from the above analysis that the urban function is predominantly business, enterprise and employment use in the Broomhill area. The proposed residential development on the subject site (illustrated in Fig. 2) is appropriate for regeneration as an alternative use as per the zoning provision for the lands. This will assist in achieving one of the key objectives for the Broomhill area - *“Transition to mixed use area primarily focused on higher value commercial uses.”*

Existing Community Services & Facilities

To further elaborate on the suitability of the subject site for a residentially led mixed use development, we have set out the connectivity of the site to the surrounding area. This is further elaborated upon in other reports attached to this planning application.

Within a 10-minute walk (1 to 1.5 kilometre) there are numerous convenient retailers such as Spar, Tesco, Centra, Lidl & Aldi stores located from the subject site (illustrated in Figure 4).

The following parks are within walking distance of the subject site: Bancroft Park, The Meadows, Tyan Hall Park, Tymon Park, Sean Walsh Memorial Park, Dodder valley park, Ballymount Park and Oscar Park.

Other public & community facilities include St. Kevin's Family Resource Centre, Belgard Community and youth centre, Tallaght Probation Project LTD., Trustus We Care, Tymon North Community Unit and Civic Theatre which are within the 800m to 1 km of distance from the subject site.

The range of uses in the surrounding area provides an appropriately balanced mix uses in accordance with the zoning and LAP objectives for the site.

Transportation

The Broomhill area is well served with high frequency transit services which connects the Dublin City Centre and other major urban centres. Figure 4 below shows that the subject site is in close proximity to high frequency bus stop (2364 & 2345) which is been served by Bus routes 27 (Clare Hall to Jobstown) and 76 (Chapolised towards Tallaght the Square).

The Belgard and Kingswood Luas stations are also located approximately 1 km (over a 10-minute walk) from the subject site which is served by the red line service.

It can be analysed from the above that the location of the subject site encourages the greater use of public transport and as further supported in the Transport Analysis by NRB Consulting Engineers attached to this application.



Figure 4 Existing public facilities and services

Conclusion

Overall, the Broomhill area provides a broad range of commercial uses. The proposed residential development is only a small fraction of land uses in the Broomhill area and contributes to the overall mix in the area. This will assist in achieving the objective BH1 – “Transition to the mixed-use area primarily focused on high-value commercial uses”. We trust the above report addresses item 1 of the An Bord Pleanála opinion, with the compliance of the scheme with other LAP planning policies contained in the attached Statement of Consistency/Planning Report by Brock McClure Planning and Development Consultants.