

**Statement of Response to An Bord Pleanála's Opinion
in relation to Reg. Ref.: ABP- 311666-21**

In respect of

A Proposed Strategic Housing Development

at

**The Former ABB Site, Belgard Road,
Tallaght, Dublin 24.**

Prepared for

Landmarque Belgard Development Company Ltd

Prepared by

John Spain Associates

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39 Fitzwilliam Place, Dublin 2
Telephone: (01) 662 5803
E-mail info@johnspainassociates.com

1.0 INTRODUCTION

- 1.1. On behalf of the applicant, Landmarque Belgard Development Company Ltd, we hereby submit this Statement of Response report which seeks to address the issues raised within the Opinion of An Bord Pleanála, issued following pre-application consultation in respect of the proposed development.
- 1.2. This Statement will refer to other documentation which forms part of the final planning application pack, where more detailed and specific responses are provided to the issues dealt within this Statement by the relevant experts / design team members and consultants.
- 1.3. This Statement demonstrates that the issues raised in the Board's Opinion have been fully and satisfactorily responded to in the Strategic Housing Development planning application.

2.0 RESPONSE TO AN BORD PLEANÁLA OPINION

- 2.1. The Opinion of An Bord Pleanála on the pre-application stage for the proposed development noted that *"is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development."*
- 2.2. The Opinion set out 3 no. mains issues that needed to be addressed that could result in the proposed development constituting a reasonable basis for an application for strategic housing development and 17 no. items of specific information that should be submitted with any SHD planning application. The following sections of this report set out these specific issues / items and summarises how these items have been addressed in the final application.

ISSUE 1 – EXPANSION OF THE TALLAGHT TOWN CENTRE

- 2.3. The first issue to be addressed relates to expansion of the overall Tallaght town centre area. This item of the Board's Opinion is as follows:

1. Expansion of the overall Tallaght town centre area. – Further consideration and / or justification of the documents as they relate to (density, height, plot ratio) regard being had to recent similar cases in the Tallaght area, since the adoption of the TTCLAP 2020 – 2026. There is a need to further consider inclusion of active uses, including at ground level to activate the proposed pedestrian street and provide facilities for the future residential population specifically the contribution proposed to the character and identity of the neighbourhood. The subject site represents an expansion of the existing Tallaght Town Centre area, it is important that the proposed scheme should be highly visually and functionally connected to the town centre development to the west. There needs to be strong permeability within the scheme and into adjoining lands. The proposal needs to integrate successfully with the street network, contribute to and enhance the character and identity of the wider area.

Response to Issue 1

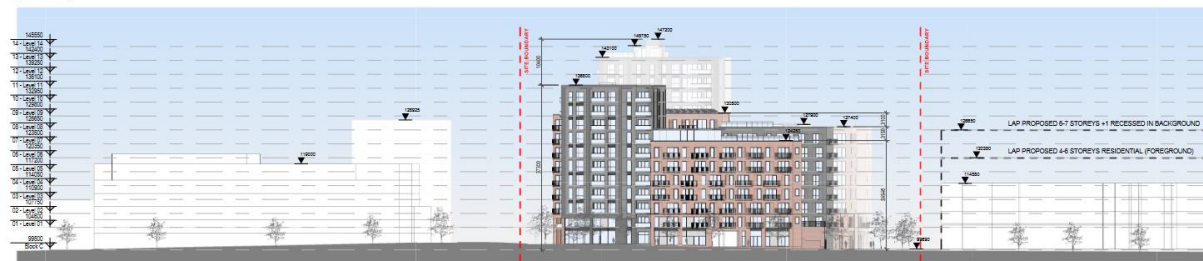
- 2.4. In response to the above issue the scheme has been revised in a number of ways in order to provide a more suitable response the existing Tallaght context to the west and in light of its expansion and permitted scheme to the north of the site.
- 2.5. Firstly, the design team reflected on the height, scale and massing of the blocks, the following key revisions have taken place:
- Block A – the tower element has been reduced by two storeys with the shoulder section reduced by one storey. Remainder of the block reduced by two floors.
 - Block B – The feature colonnade on the top was removed to bring it in line with the other blocks.
 - Block C – the tower element has been reduced by two storeys with the shoulder section reduced by one storey. The remainder of the block has been reduced by one floor.
- 2.6. These changes resulted in the following site statistics:
- Overall unit no.'s were reduced from 380 to 334;
 - The density of the scheme was reduced from 432 units per ha to 372 units per ha; and
 - The plot ratio reduced from 3.63 to 3.32.
- 2.7. The development provides a more suitable response to the adjacent permitted scheme to the north. Contextual elevations prepared by CWOB reflect the nature of this relationship further.



CGI of the scheme as viewed from the north east.



2 Elevation Contextual - East
1:500



4 Elevation Contextual - West
1:500

Contextual elevations from the east and west.

2.8. The TVIA prepared by Modelworks has assessed the proposal in terms of its visual and townscape impacts, it states:

“Measuring the magnitude of change against the townscape sensitivity the significance of the effects is predicted to be ‘moderate’(definition: An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends) and positive.

Townscape change of some significance is inevitable with the development of an opportunity site in a prominent position in the urban structure. This is the desired effect of the site’s redevelopment in the context of a Tallaght’s ‘transformation towards a high quality mixed use urban centre of city scale and character’ .In addition to contributing to the realisation of the LAP vision for the town centre, the development would achieve a number of other townscape-related objectives stated in the LAP”

2.9. In addition, the development has also been revised in regard to the other aspects of Issue 1 notably ground floor uses, these key changes can be summarised as follows:

- A review of the uses on the ground floor resulted in the movement of the commercial spaces to the western side of the development with the BTR amenity space along the northern façade.
- Review of the open space with an increase in space provided on the southern boundary. This was achieved by pulling back the podium between Blocks A & B and creating a large public square. Review of the landscape strategy for the public realm.

2.10. CWOB have provided the following rationale, in addition to the detail set out in drawings and their Architectural Design Statement:

“As stated, the commercial uses proposed within the scheme have been relocated to the western edge of the development, providing a fine urban grain and encouraging an active mix of uses, business types and unit frontages at this location. The northern edge of the development facing onto Belgard Square North hosts the majority of the BTR amenity spaces which engage with the street and are supported by the pocket parks which form a critical part of the public realm. Please refer to Sections 7.0 Layout, 10.0 Privacy + Amenities and 12.0 Detail Design of this document for an outline of the proposed features and layout for the active uses within the proposed scheme.

The reconfiguring of the ground floor to align more closely with the vision of the LAP also supports the visual and functional connection to the rest of the town centre. The review and increase of public open space along the southern boundary connection improves upon the permeability of the site and integration with the existing street network. These changes, in conjunction with further progression of the architectural and landscape proposals serve to contribute to and enhance the character of the wider area. Please refer to the detailed landscaping strategy that has been prepared by Cameo & Partners Landscape Architects and submitted as part of this application for further details on the landscaping strategy.”

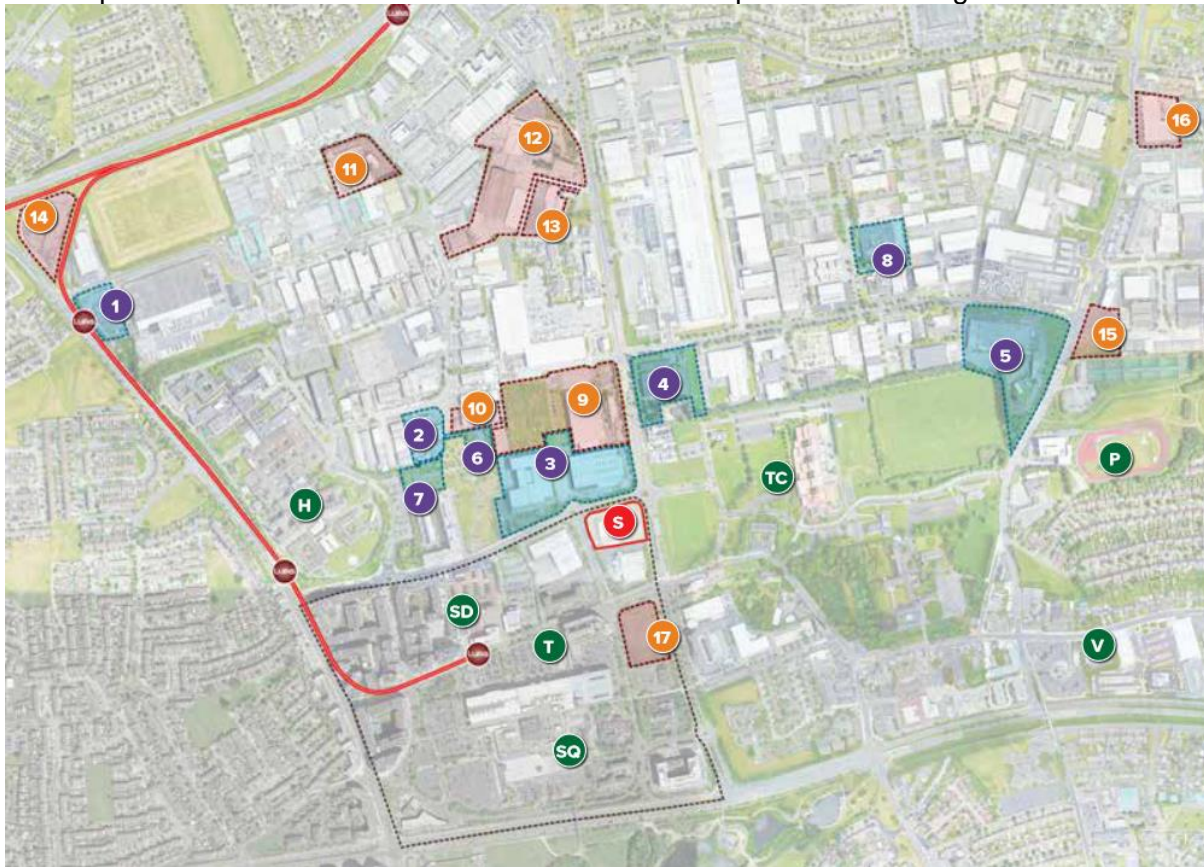


Overview of key changes at ground floor level. (Source: CWOB, 2022).



CGI of the scheme as viewed from the west reflecting ground floor activity.

2.11. Tallaght is undergoing considerable change, as set out below and regard has been had to development permitted since the adoption of the Local Area Plan. We note the grant of permission under ABP-309916, since the adoption of the LAP, which was permitted as a material contravention of the LAP plot ratio and height.



Overview of planning permissions in the area. (Source: CWOB, 2022)

Local Granted Planning Permissions

- 1 **SHD Bord Pleanala Ref 301204** - 196 no. apartments, a commercial unit, an office, a crèche and a gym.
- 2 **SHD Bord Pleanala Ref 308398** - 20 - 133 no. affordable apartments
- 3 **SHD Bord Pleanala Ref 303306** - 438 no. residential units, 403 student accommodation beds and 7,000 sq ft of retail.
- 4 **SHD Bord Pleanala Ref 30306** - 328 no. apartments, crèche and associated site works.
- 5 **PL06S.306705 - Gallaher Site** - 502 no. apartments and a creche.
- 6 **Tallaght Innovation Centre** - Proposed new Innovation Centre.
Tallaght Apartment Development - 133 affordable rental apartments with a community facility.
- 8 **SHD Bord Pleanala Ref 311725** - 242 no. apartments, creche and associated site works.

Under Development

- 9 Marlet Site - Phase 2 under design development
- 10 Phase 2 of SHD, An Bord Pleanala - Ref 30898-20
- 11 Bartra Site - under design development
- 12 Comans site - under design development
- 13 Glenabbey site - under design development
- 14 Unit 1 Cookstown - under design development
- 15 Bancroft Park - under design development
- 16 Agneli Motors Site - under design development, An Bord Pleanala - Ref 311038
- 17 Belgard Square East - - under design development

ISSUE 2 – Architectural Design and Rationale

- 2.12. The second issue to be addressed relates to the architectural design and rationale as it relates to the surrounding area. This item of the Board's Opinion is as follows:

“2. Further consideration of the documents as they relate to the Architectural design and rationale/ justification outlined as it relates to the interaction with the surrounding area. A justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The further consideration should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries.”

Response to Item 2

- 2.13. In addition to the changes as regards height and ground floor use which have a significant impact on the scheme as a whole in terms of visual impacts and site context the following rationale has been provided in response (See the Architectural Design Statement):

- i. **Urban Design Considerations:** The proposed site layout strategy is based on the principles of best practice urban design. The layout provides a simple, inviting and safe spaces and routes for residents and visitors within and through the site that serve to knit the development into its surroundings. The design approach considered the improvement and attractiveness of the public realm; activeness and permeability of its connections; and elegance and engagement of its elevations.*
- ii. **Visual Impacts:** The visual impact of the development has been significantly amended with the reduction of height to the scheme. As per the Townscape and Visual Impact Assessment, the visual effects are predicted to be positive. This reflects the high quality design of the proposal, which responds appreciably to the physical context (including the neighbouring permitted Marlet scheme and the site's pivotal position in the urban structure) and the relevant LAP objectives. The assessment found no negative visual effects for any of the viewpoints.*

Regarding building height, the key question is whether the proposal would undermine the LAP's height strategy, or whether it would complement or enhance the strategy. Analysis of the receiving environment, relevant policy and the proposal indicates that there is a strong argument in favour of the development. The increased height is appropriately located to mark the town centre gateway and the interface between the town centre and the university. The photomontages show that the height would both add to townscape legibility (by identifying a place of importance) and add visual interest to views from a variety of angles and distances. Importantly, the site is sufficiently removed from any of the LAP-designated tall building sites to avoid any dilution of their intended effect.

Please see the Townscape and Visual Impact Assessment that has been prepared by Modelworks based on Verified Views prepared by 3D Design Bureau and is included as part of this report.

- iii. **Site Context / Locational Attributes of the Area:** Tallaght Town Centre is a highly liveable, well designed, quality urban environment where people feel connected and there is a distinctive sense of place. The proposed development is in keeping with the spirit of the TTCLAP 2020 – 2026 and delivers on the desire to “deliver high quality housing and well connected neighbourhood areas with a*

strong sense of community and social cohesion.” It is envisioned that the high calibre architectural scheme will significantly help improve the wider area through establishing a new community development to meet increasing demand for homes and significantly enhanced public space. All of which will complement the future development of local amenities helping to enhance the existing hub at Tallaght Town Centre.

- iv. **Linkages through the Site/ Pedestrian Connections:** *In keeping with the TTCLAP 2020 – 2026, a new tertiary link has been created through the site along the southern boundary. This link, which has been proposed as a linear park and public open space, will act as a new route within Tallaght Town Centre. The inclusion of this pedestrian connection promotes permeability through the site as well as integrates the site into the existing street network and enhances the wider public realm.*
- v. **National and Local Planning Policy:** *The proposed scheme has been designed having regard to all relevant key Governmental Guidelines. The scheme has also been designed having regard to the South Dublin County Development Plan 2016-2022 which is the relevant statutory development plan for the area as well as the TTCLAP 2020 – 2026.*

2.14. In addition to the above further consideration has been given to the following aspects:

- i. **Finishes of the Blocks:** *Each of the elevations are considered carefully regarding aspect, massing and scale. The elevations have mixed material palette selected to create vibrant character areas which combined a variety of finishes type/colour reduces the elevations to a suitable aesthetic and scale. The selection of durable materials provides low maintenance requirements. Innovative building techniques requires building designers to be adequately knowledgeable and utilise a skill-set to combine this technology with material selection to create components with lower life-cycle costs. Quality design and construction is fundamental to ensuring the materials selected will be long life and maintain quality aesthetic throughout their life.*
- ii. **Design Relationship between the Blocks:** *The organisation of the proposed blocks has been carefully considered and responds to daylight / sunlight, orientation and views as well as their relationship to one another. A comprehensive daylight and sunlight analysis report has been prepared by 3D Design Bureau which accompanies this submission. This study has been used in the design process to achieve the highest standards possible within the development while having minimum impact on the surrounding context. Please see Section 12 (12.2 Design Development- Daylight / Sunlight Study) for full details.*
- iii. **Relationship with Adjoining Development:** *The Arboury development will create a tight urban grain that follows that established in the granted permission of the Marlet site adjacent and is in keeping with the requirements of the TTCLAP 2020 – 2026. As mentioned in the previous section, the heights have been reduced throughout the scheme to more closely align with the adjoining development and to create a more appropriate dialogue between the sites.*
- iv. **Interface along the Site Boundaries:** *As stated above the southern boundary of the site has been proposed as a new pedestrian connection and public open space that provides a new tertiary route within the network of Tallaght Town Centre. Responding to comments from ABP and SDCC, the western edge of the scheme is populated by the commercial uses within the development. These uses will activate the street frontage along this boundary and support the already existing commercial core of the town. The amenity spaces are organised along the northern*

edge of the development and face out onto two proposed pocket parks. The interaction between these communal amenity spaces and the public open space of the parks will foster a sense of community and connection for residents and visitors alike. Finally, the eastern edge has a primarily residential function with a number of duplex and workspace units fronting out the street.



View of Proposed Development from Belgard Square North



View of Proposed Development from Linear Park from the East

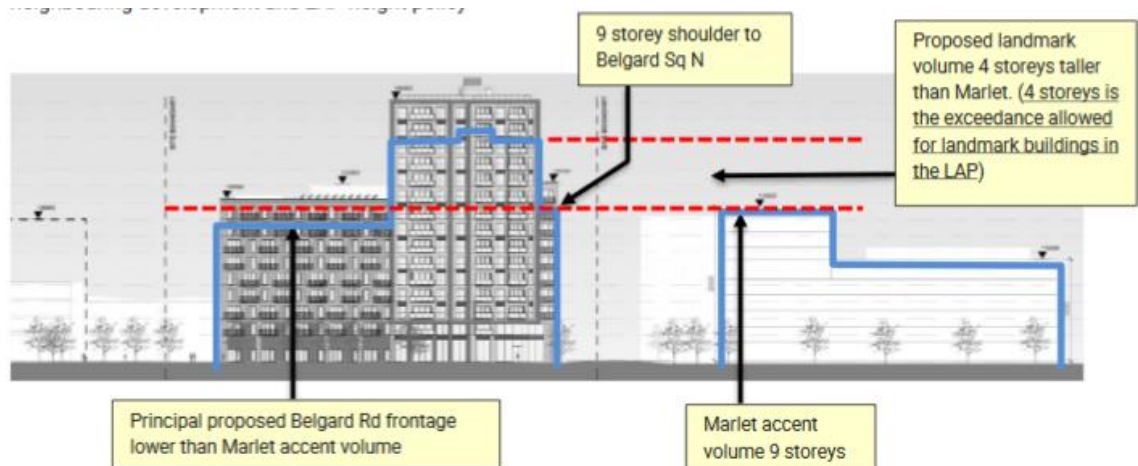
View of proposed development from the north and east. (Source: CWOB, 2022)

2.15. The change in heights has been assessed by Model Works as part of the TVIA whom summarises the changes as follows:

- The principal frontage to Belgard Road was reduced from nine to eight storeys. This part of the building, while taller than the principal frontage of the Marlet building (six storeys), would thus be lower than the accent volume at the corner of the Marlet site.
- The proposed landmark volume at the corner of Belgard Road and Belgard Square North, overlooking the gateway junction and the TUD campus, was reduced from 15 to 13 storeys. The landmark volume would thus be four storeys taller than the Marlet accent volume across the road.
- The four storey variance was specifically used as the LAP allows for designated landmark buildings to exceed others in the street elevation by four storeys. (It is the design intent for the proposed development to read as a landmark

development in the Tallaght townscape. The greater height than the Marlet development may also be considered appropriate as the subject site is zoned Town Centre whereas the Marlet site is outside the town centre zone.)

- The principal frontage to Belgard Square East was reduced from nine storeys to seven storeys. This is in recognition of the fact that Belgard Square East is classified a 'secondary route/frontage' in the LAP. It should thus read as being lower in status than Belgard Square North, which is classified a 'primary route/frontage'. The reduction in height of the principal frontage on Belgard Square East to seven storeys would achieve this, since the mean height proposed along Belgard Square North is nine storeys.
- The proposed accent volume at the corner of Belgard Square North and Belgard Square East was reduced from 12 storeys to 11 storeys. This would (a) result in a four storey step up along the Belgard Square East frontage to the accent volume at the junction, and (b) bring the accent volume closer in height to the permitted 10 storey volume diagonally across the junction on the Marlet site. (The Marlet site is outside of the Town Centre zone, therefore an increase in height from the Marlet site to the subject site may be considered appropriate.)
- The frontage to Belgard Square North was retained at nine storeys -apart from the accent volumes at either end of the block. This height reflects the status of the street, i.e. the 'primary' route connecting the town centre (and the hospital and County Hall) to the west, to the university and Belgard Road to the east.. This frontage is also permeable, being composed of the short elevations of the three blocks. This permeable frontage means that the height of the buildings would not cause excessive enclosure. These height response to the adjacent streets is shown to good effect in the CGI below(Figure 15)



Schematic of annotated design response to context. (Source: Modelworks, 2022)



View from the north west including permitted Marlet scheme (left). (Source: Modelworks, 2022)

ISSUE 3 – RESIDENTIAL DESIGN

- 2.16. The first item of specific further information relates to residential amenity design. This item of the Board’s Opinion is as follows:

3. Residential Design - Further consideration/justification of the documents as they relate to the quality of the proposed residential amenity. This consideration should have regard to, inter alia, the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’); the ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities’ (2020) and the and the relevant provisions of the TTCLAP 2020 – 2026, in particular, with regard to number of single aspect units, and daylight and sunlight access to internal habitable areas and in particular to communal courtyards. A Shadow Impact Assessment required for communal open spaces, private open space and public open spaces. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating, inter alia, to layout of the proposed development, improving the quality and providing extended hours of daylight and sunlight to the internal courtyards and to the public open space.

Response to Issue 3

- 2.17. CWOB have provided a detailed response to Issue No. 3

*i. **Single Aspect Units:** The layout of the proposed blocks has been carefully considered to respond to daylight / sunlight, aspect and views with Dual Aspect Units provided where possible. Specific Planning Policy Requirement of the “Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)” states that a minimum of 33% of Dual Aspect Units will be required in more central and accessible urban locations. The proposed site is a central and accessible location as outlined by this requirement. The submitted design has provided 146 Dual Aspect Units which equates to an overall percentage of 44% of the apartments within the proposed scheme. It is submitted that this is fully compliant with, and in excess of, SPPR 4 of the “Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).” As per the guidelines, where single aspect apartments are provided, the number of south facing units*

should be maximised, with west or east facing single aspect units also being acceptable. The proposed scheme avoids any north facing single aspect apartments ensuring that all living spaces are provided with direct sunlight for some part of the day. The single aspect apartments have been considered to ensure that they are overlooking a significant amenity such as the internal courtyards or have views to the surrounding town and landscape beyond.

- ii. **Daylight / Sunlight Access (General):** As part of the design process for the proposed The Arboury development, 3D Design Bureau (3DDB) were commissioned to carry out a daylight assessment, sunlight assessment and shadow study which accompanies this submission. This study has been used in the design process to achieve the highest standards possible within the development while having minimum impact on the surrounding context. The assessments carried out studied the level of daylight in the proposed residential units and the level of sunlight penetration into the proposed outdoor amenity areas. CWOB and 3DDB worked closely to ensure that high compliance rates of daylight & sunlight quality were achieved. The final report is a comprehensive assessment across the scheme and advises the board on the circa compliance rate across the scheme with living/ kitchen/dining (LKDs) space assessed at 2% daylight factor.
- iii. **Daylight / Sunlight Access to Internal Habitable Areas:** The recommended minimum for Average Daylight Factor (ADF) is based on the function of the room being assessed. The recommendations as per the BS 8206-2:2008 are as follows: 2% for kitchens; 1.5% for living rooms; and 1% for bedrooms. BS 8206-2:2008 also recommends that where a room serves more than one purpose, such as the modern day apartment design of the LKD space, the minimum average daylight factor should be taken for the room with the highest value. Following this advice, a target ADF value of 2.0% has been applied to LKDs within the proposed scheme. This proposed development consists of 334 no. units of which 122 no. will be Build-to-Rent (BTR) while there are also 4 no. live-work units, which makes up circa 816 no. habitable rooms. When assessing LKD's against a target value of 2%, circa 94% of the rooms meet the recommendations. Given the size and density of the proposed development the ADF compliance rate could be seen as very favourable. Should full ADF compliance be sought, design changes could be needed, such as the removal of balconies or a reduction of unit sizes. Such mitigation measures could reduce the quality of living within the proposed units to a greater degree than the improvements that would be gained with increased ADF values.
- iv. **Daylight / Sunlight Access to Communal Courtyards:** The BRE Guidelines recommend that for a garden or amenity area to appear adequately sunlit throughout the year, at least half of it should receive at least two hours of sunlight on March 21st. The external amenity spaces have been considered carefully through all design stages and 3DDB have evaluated the sunlight performance of the amenity spaces as the design progressed to ensure sunlight penetration was maximised. Both communal courtyards greatly exceed the recommended minimum area capable of receiving 2 hours of sunlight on March 21st. Please see Section 12 (12.2 Design Development-Daylight / Sunlight Study) for full details of the Daylight / Sunlight Assessment.

Further consideration has also been given to the layout of the proposed development and how to improve the quality of the internal courtyards and the public open space with particular focus on providing extended hours of daylight and sunlight. The reduction in the proposed heights of the scheme and the increase in public open space provided on the southern boundary mentioned previously will improve the quality of the internal courtyards and public open space provided within the development. Further refinement of the facades,

particularly in relation to the size, location and density of balconies provided, will improve the quantity and duration of daylight and sunlight provided to the internal courtyards and public open space.

3.0 SPECIFIC ITEMS REQUESTED BY ABP

- 3.1. In addition to the above issues, as provided under article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, ABP requested the following requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017.

ITEM 1 – VISUAL IMPACT ASSESSMENT

- 3.2. The first item of specific further information relates to visual impact assessment. This item of the Board's Opinion is as follows:

1. A visual impact assessment of the proposed development that addresses, inter alia, the height, scale and massing of the proposal in the context of the transitional nature of the receiving environment. The VIA should also address views along Belgard Road, including the proposed treatment to the public realm.

Response to Item 1

- 3.3. A comprehensive Townscape and Visual Impact Assessment has been prepared by Model Works and is enclosed with this application.
- 3.4. The site is currently commercial-industrial in character and makes no positive contribution to the townscape character or quality. In terms of the magnitude of townscape change which would result from the proposed development can be classified 'medium'.

Measuring the magnitude of change against the townscape sensitivity the significance of the effects is predicted to be 'moderate'(definition: An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends) and positive. Townscape change of some significance is inevitable with the development of an opportunity site in a prominent position in the urban structure. This is the desired effect of the site's redevelopment in the context of a Tallaght's 'transformation towards a high quality mixed use urban centre of city scale and character'. In addition to contributing to the realisation of the LAP vision for the town centre, the development would achieve a number of other townscape-related objectives stated in the LAP.

- 3.5. In terms of visual effects the TVIA concludes:

The viewpoint assessments found that the visual effects would be most significant on the Belgard Road corridor, Belgard Square North and East (local views) and the university campus. In all cases the visual effects are predicted to be positive. This reflects the high quality design of the proposal, which responds appreciably to the physical context (including the neighbouring permitted Marlet scheme and the site's pivotal position in the urban structure) and the relevant LAP objectives. The assessment found no negative visual effects for any of the view points. In conclusion, the proposed development can be considered an appropriate intervention in the evolving townscape of Tallaght town centre

ITEM 2 – RESIDENTIAL AMENITY

- 3.6. The second item of specific further information relates to residential amenity. This item of the Board's Opinion is as follows:

2. A report that addresses issues of residential amenity, specifically with regards to potential or perceived, overlooking, overshadowing and overbearing. The report shall include full and complete drawings including levels and cross-sections showing sections showing the relationship between the proposed buildings within the scheme and adjacent permitted residential development to the north of the site.

Response to Item 2

- 3.7. The Architectural Design Statement prepared by CWOB specifically addresses these considerations of amenity.
- 3.8. All the residential units have an area of usable communal open space and the vast majority are provided with private open space in the form of balconies/private terrace. All the proposed balconies are in compliance with the minimum size and depth of 1.5 meters as per Sustainable Urban Housing - Design Standards for New Apartments (Dec 2020). The proposed design considers the orientation of the development in order to maximise the solar gain and natural light aspect of each apartment with 44% of the apartments are dual aspect.
- 3.9. Communal open spaces are delivered through a combination of podium and roof level spaces that consist of informal gathering spaces, generously landscaped podium gardens and areas for quiet reflection as well as pocket parks linking with commercial units to enable accessible and active areas for all users.
- 3.10. Privacy and overlooking has been at the forefront in the design of the apartments and the positioning of balconies. The design ensures that people can seek privacy within their own dwellings while still having a connection to the outside. Suitable separation distances are proposed to ensure that a high level of amenity is delivered for future residents.
- 3.11. A series of contextual elevations have been prepared at 1:500 scale in order to fully illustrate the design of the proposed development and relationship with adjacent permitted development to the north. For further details please see Section 7.0 Layout, 8.0 Public Realm, 10.0 'Privacy and Amenity' and 12.0 Detail Design of CWOB's Design Statement that outlines in detail the residential amenity spaces as well as the relationship between the buildings and the adjoining open spaces.

ITEM 3 – DAYLIGHT AND SHADOW IMPACT ASSESSMENT

- 3.12. The third item of specific further information relates to Daylight and Shadow Impact Assessment. This item of the Board's Opinion is as follows:

3. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.

Response to Item 3

- 3.13. A comprehensive Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau and is enclosed with this application.
- 3.14. This study has been used in the design process to achieve the highest standards possible within the development while having minimum impact on the surrounding context as further set out in CWOB's Section 12 (12.2 Design Development- Daylight / Sunlight Study).

ITEM 4 – JUSTIFICATION OF OPEN SPACE

- 3.15. The fourth item of specific further information relates to justification for open space in terms of location, hierarchy and quantum. This item of the Board's Opinion is as follows:

4. Justification of location, hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standard.

Response to Item 4

- 3.16. The proposed development provides 17% public open space. The 2016-2022 Development Plan refers to the implementation of the public open space requirements of the 2009 Sustainable Residential Development in urban Areas Guidelines (2009), which seek 10% public open space for brownfield sites. This is consistent with the 10% sought under the Local Area Plan. The draft Development Plan 2022-2028 does however include a different metric for the calculation of public open spaces, which the development does not comply with and is addressed in the material contravention statement.
- 3.17. Cameo & Partners have prepared a detailed landscape strategy, this strategy has been be summarised as follows within Cameo & Partners Design Statement:

“The emerging landscape positively responds to the Site’s location through the creation of a series of connected public and raised amenity pocket parks and courtyards, and the strengthening of wider vistas to the Wicklow mountains to the south and into the permitted It strengthens green infrastructure through the introduction of the new green lane and the strong north south linkages.

It provides improved access for the local and emerging community- provides defensible space between the communal courtyards and the adjacent private frontages. It provides spaces for new planting to be accommodated and to provide strong tree planting to the street frontage

The proposals seek to provide 1489 sq m of Public open space, 17% of the site area, in excess of the policy requirement. Provision is also made for public realm improvements which will improve the amenity of the streetscape and strengthen pedestrian connections to the wider area while planting areas have been introduced to support with biodiversity enhancement and provide a visual screen from the road traffic.”

- 3.18. The extract below illustrates the location and extent of these spaces:



***Location and extent of public open space and public realm improvements proposed.
(Source: Cameo, 2022).***

- 3.19. In terms of communal open space this will be provided within the first within the courtyard and at upper floors outdoor communal areas of the site. The communal open spaces will not be taken in charge, there will be a long term management and maintenance plan operated by a management company. Communal open space calculations are based on the current requirements as stated in Design Standards for New Apartments Guidelines for Planning Authorities Department of Housing, Planning and Local Government, March 2020.
- 3.20. Communal open space required amounts to 0.1955 ha while the Communal Open space Provided: 0.2144 ha. Any ramps, private spaces, unusable incidental space has been omitted from the calculation. All areas of Communal open space exceed the required sunlight BRE recommended 2 hour sunlight access on the 21st of March.
- 3.21. The extract below illustrates the location and extent of communal open space. For full details please see the Landscape Design Statement and associated drawings.



Location and extent of communal open space proposed. (Source: Cameo, 2022).

ITEM 5 – PUBLIC OPEN SPACE

- 3.22. The fifth item of specific further information relates to public open space. This item of the Board's Opinion is as follows:

5. Details specifying which areas are proposed as public open space and which are specified as communal open space, and showing which areas it is proposed that the council would take in charge. Where it is not proposed that open space would be taken in charge, details should be submitted as to how such space would be managed including details of how access to it and its use would be controlled and who would take responsibility over the long term for the costs arising from maintenance and the liability for accidents.

Response to Item 5

- 3.23. In response to this Item please also see Item 4 above.
- 3.24. As part of the planning submission CWOB have prepared a Taking In Charge Plan which specifies which areas are proposed as public open space that it is proposed that the council would take in charge. Please refer to drawing PE19150-CWO-ZZ-00-DR-A-0104 for this information.
- 3.25. The communal open spaces will not be taken in charge, there will be a long term management and maintenance plan operated by a management company. For open space that will be managed, a landscape report has been prepared by Cameo & Partners Landscape Architects and is included within this application. This includes

details about how such space will be managed including details of how access to it and its use would be controlled and who would take responsibility over the long term. This document is supported by the Operational Management Plan prepared by LIV Consult.

ITEM 6 – LANDSCAPE

- 3.26. The sixth item of specific further information relates to landscape. This item of the Board's Opinion is as follows:

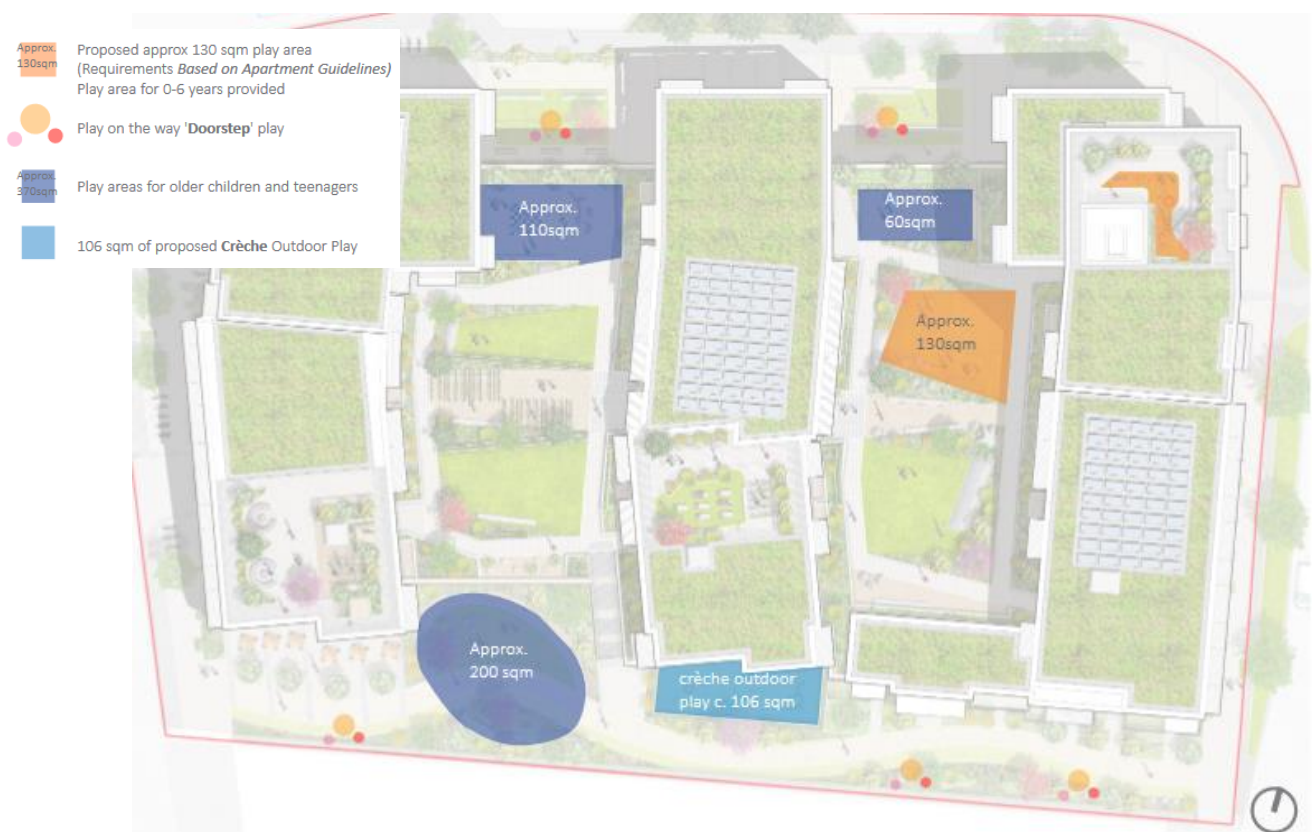
6. Detailed landscape drawings that illustrate hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. Details of play equipment, street furniture including public lighting and boundary treatments should be submitted.

Response to Item 6

- 3.27. In response to Item 6 hard and soft landscaping, useable communal open space, meaningful public open space, quality audit and way finding have been set out within the Landscape Design Statement prepared by Cameo and Partners.
- 3.28. In addition to the details set out above key elements of the landscape strategy can be summarised as follows:

Play strategy

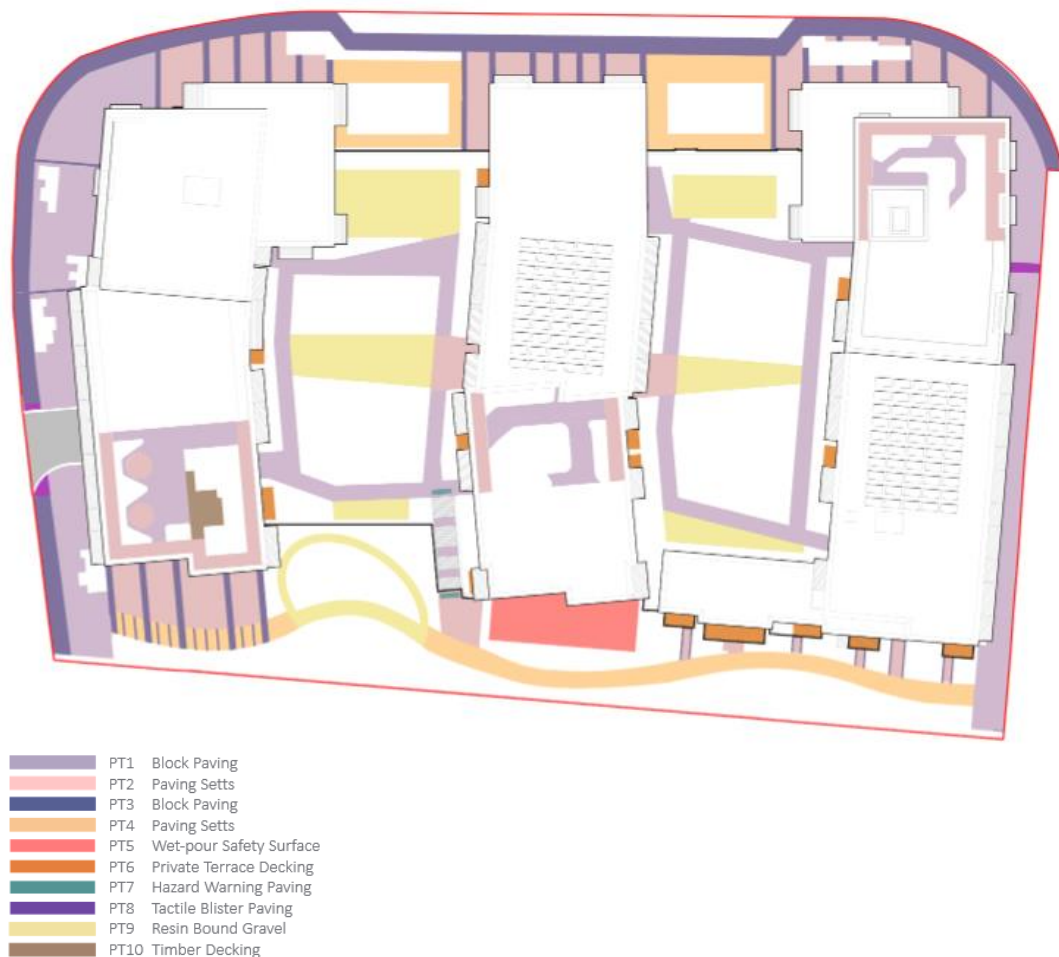
- 3.29. The integration of play provision throughout the open space is an important element to ensure access and usability of the open spaces for children and young people. These form the overall policy background to the play strategy for Arboury scheme.



Play strategy. (Source: Cameo, 2022)

Hardscape Strategy

- 3.30. The hard landscape elements had been carefully selected to enhance the space. High quality elements will help to create a positive, inclusive and inspiring environment, where people feel comfortable to walk through, sit, contemplate and enjoy the landscape setting.



Hardscape strategy. (Source: Cameo, 2022).

Softscape strategy:

- 3.31. Planting is an important consideration as it softens build form, humanises space, mitigates the microclimate and provides a seasonal sense of place. The planting has been developed with the following considerations:
- The use of tree, shrub and perennial planting to enhance the design by responding to the articulation of space in opening vistas, defining and hiding views.
 - Planting to be appropriate to setting.
 - Species selection to elevate local biodiversity Levels A variety of plantings have been selected to enhance the characteristics of the scheme. A variety of trees have been selected to enhance the characteristics of the scheme.

A total of 86 no. large multi-stem and large shrubs are proposed across the development overall.



Softscape strategy. (Source: Cameo, 2022).

ITEM 7 – BUILDING LIFECYCLE REPORT

- 3.32. The seventh item of specific further information relates to a building lifecycle report. This item of the Board's Opinion was as follows:

7. A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Response to Item 7

- 3.33. A building lifecycle report has been prepared by LIV Consult and is enclosed with the application. In compliance with Section 6.13 of the Design Standards for New Apartments. This considers the long-term management and maintenance of the proposed development. Including the proposed materials and finishes to the scheme such as the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments

ITEM 8 – BTR PUBLIC NOTICES

- 3.34. The eighth item of specific further information relates to the public notices. This item of the Board's Opinion is as follows:

8. As per SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020 the development must be described in the public notices associated with a planning application specifically as including 'Build to Rent' housing and a covenant/legal agreement is required at application stage for the BTR portion of the development.

Response to Item 8

- 3.35. As required by SPPR7 the proposed development has been described as a 'Build to Rent' development with respect to the Build-to-Rent element. A draft Covenant is included as Appendix 2 of the Statement of Consistency.

ITEM 9 – Residential Support Facilities

- 3.36. The ninth item of specific further information relates to residential support facilities. This item of the Board's Opinion is as follows:

9. A rationale or evidence-based justification that the proposed resident support facilities and resident services and amenities are appropriate and accord with SPPR7 (b) of the Apartment Guidelines 2020.

Response to Item 9

- 3.37. Please see enclosed BTR Operational Management Plan has been prepared by LIV Consult which demonstrates the extent and nature of the residential support facilities. In addition please see CWOB Design Statement and associated drawing for further detail.

ITEM 10 – HOUSING QUALITY ASSESSMENT

- 3.38. The tenth item of specific further information relates to the HQA. This item of the Board's Opinion is as follows:

10. A Housing Quality Assessment that provides details in respect of, the portion of proposed build to sell apartments, set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect and which of the BTS apartments exceeds the floor area by 10%.

Response to Item 10

- 3.39. A HQA has been prepared by CWOB and is enclosed with this application. Please refer to Section 12 (12.10 Dual Aspect & 12.11 Floor Area Exceeded) of the Architectural Design Statement for full details on the dual / single aspect apartments and which of the apartments exceed the floor area by 10%.

ITEM 11 – EIAR Screening

- 3.40. The eleventh item of specific further information relates to EIAR screening. This item of the Board's Opinion is as follows:

11. Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIAR screening.

Response to Item 11

- 3.41. An EIAR Screening Report and Regulation 299B Statement has been prepared by AWN and is enclosed with this application.

ITEM 12 – TTA

- 3.42. The twelfth item of specific further information relates to a TTA. This item of the Board's Opinion is as follows:

12. A Traffic and Transportation Impact Assessment.

Response to Item 12

- 3.43. A Traffic Transportation Impact Assessment has been prepared by CS Consulting Group and is enclosed with this application.

ITEM 13 – DMURS

- 3.44. The thirteenth item of specific further information relates to DMURS. This item of the Board's Opinion is as follows:

13. A report prepared demonstrating specific compliance with the requirements set out in the Design Manual for Urban Roads and Streets and the National Cycle Manual for all streets, including the revised junction to replace the roundabout on Belgard Square North and the proposed crossing of the Belgard Road.

Response to Item 13

- 3.45. A DMURS Statement of Consistency has been prepared by CS Consulting Group and is enclosed with this application.

ITEM 14 – MICROCLIMATE IMPACTS

- 3.46. The fourteenth item of specific further information relates to Microclimate Impacts. This item of the Board's Opinion is as follows:

14. A Microclimate Impact Assessment.

Response to Item 14

- 2.38. A Wind Microclimate Assessment has been prepared by Metec Consulting Engineers and is enclosed with this application.

ITEM 15 – HELIPAD INTERFERENCE

- 3.47. The fifteenth item of specific further information relates to operation of the helipad. This item of the Board's Opinion was as follows:

15. Details of any measures required to prevent interference with aviation, in particular the use of the helipad at the hospital at Tallaght. 7. Proposals with compliance with Part V of the Planning and Development Act, 2000 (as amended). [sic]

Response to Item 15

- 3.48. An Aeronautical Assessment Report has been prepared by OD&J and is enclosed with this application. This report has assessed potential interference with aviation, in particular the use of the helipad at the hospital at Tallaght concluding:

“It is not anticipated that the proposed development will interfere with current helicopter operations to/from the hospital helipad. While this helipad is not a ‘heliport’, Approach and Departure Surfaces in compliance with international ‘heliport’ standards [and as provided for in the SDCC Draft CDP 2022-28] can, if required, be designed and provided (with 21m+ clearance) above the proposed building.”

- 3.49. A Part V proposal accompanies the application.

ITEM 16 – OPINION OF SDCC

- 3.50. The sixteenth item of specific further information relates to the Opinion of SDCC. This item of the Board’s Opinion was as follows:

16. A full response to matters raised within the PA Opinion and Appended South Dublin County Council Department comments submitted to ABP on the 11.01.2021

Response to Item 16

- 3.51. In response to Item 16 please see Appendix 1 for overview of response to matters raised within the PA Opinion and Appended South Dublin County Council Department comments submitted to ABP. In addition, please see the respective consultants reports which summarise the response to respective considerations raised.

ITEM 17 – TAKEN IN CHARGE DETAILS

- 3.52. The seventeenth item of specific further information relates to areas to be taken in charge. This item of the Board’s Opinion was as follows:

17. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

Response to Item 17

- 3.53. In response to Item 17 CWOB have prepared a Taking In Charge Plan. Please refer to drawing PE19150-CWO-ZZ-00-DR-A-0104 for this information.

ITEM 18 – Construction and Demolition Waste Management Plan

- 3.54. The eighteenth item of specific further information relates to the Construction and Demolition Waste Management Plan. This item of the Board’s Opinion was as follows:

18. Site Specific Construction and Demolition Waste Management Plan.

Response to Item 16

- 3.55. In response to Item 16 a Construction and Demolition Waste Management Plan has been prepared by CS Consulting Group and is enclosed with this application.

4.0 CONCLUSION

- 4.1. In conclusion, all the issues raised by An Bord Pleanála in its opinion dated 1st February have been comprehensively addressed in the planning application submitted to the Board as set out within this statement of response and the accompanying documentation.
- 4.2. The proposed development provides for a significant number of high-quality residential units across a range of sizes and tenures and within a range of building typologies, with associated childcare facility and open space, in a scheme which effectively responds to the characteristics and constraints of the subject lands with a considered and site-specific design.

APPENDIX 1: RESPONSE TO SDCC OPINION

Item	Response
Planning Department	
<p>It is the opinion of the Planning Authority that the proposed height and plot ratio of the development should be reduced to match the standards provided for in the Tallaght Town Centre Local Area Plan 2020 – 2026, and that the design of the scheme should reflect the transition of heights across the site identified in the LAP, and furthermore that building height to the tertiary link street to the south should reflect the status of that street, and the need for fine urban grain provided for in the Plan.</p>	<p>Revisions to the proposed development have significantly reduced the plot ratio and density. However the development remains above the parameters set out in the LAP.</p> <p>The rationale and justification for this is set out in the JSA's Statement of Material Contravention.</p>
<p>The proposed development does not comply with Objective RE2 of the Tallaght Town Centre Local Area Plan 2020 – 2026, which requires 30% provision of 3-bed units in all developments. The under-provision of 3-bed units in this development would undermine the formation of a sustainable residential community in this area, while also failing to meet local housing demand. It is the opinion of the Planning Authority that the applicant should revise the mix to meet the Plan requirements.</p>	<p>It is submitted that Objective RE 2 is not consistent with national policy guidelines. The proposed development is consistent with SPPR 7 and SPPR 8 of the Apartment Design Guidelines.</p> <p>The rationale and justification for this unit mix is addressed in full in the Material Contravention Statement enclosed and in Section 5.0 of the Statement of Consistency in relation to the Design Standards for New Apartment Guidelines for Planning Authorities (December 2020).</p>
<p>Mix of uses: That commercial ground floor units are incorrectly placed given the urban framework provided for in the LAP (see sections on fine urban grain and mix of uses).</p> <ul style="list-style-type: none"> - That the spread out nature and scale of the units raises questions as to their viability and catchment; - That a larger provision of commercial and amenity uses may be warranted given the land-use zoning and the LAP designation of 'The Centre'. 	<p>Following receipt of South Dublin County Council's Opinion, the scheme evolved and further progressed through the design process, responding to the feedback of the council. Commercial units have been reduced and realigned to front onto Belgard Square East with the rest of the local homezone being predominantly residential. These are non-BTR units with own-door frontage and where possible generous private amenity spaces.</p>
<p>The current Part V proposal of an enhanced lease on 10% of the units is not in line with the Housing Department's preference to acquire units on site, therefore the Applicant is encouraged to engage directly with the housing department to advance the Part V negotiations. The applicant should also provide proof of date of purchase of the site to the housing department to determine the Part V percentage liability.</p>	<p>The applicant submits a proposal in compliance with Part V of the Act for an enhanced lease; however acknowledges the Housing Dept preference to acquire sites and that ultimately should permission be granted, agreement will be required in order to discharge the condition.</p> <p>Proof of the date of purchase has been provided within the Part V pack from the applicants solicitors.</p>
<p>It is the opinion of the Planning Authority that with some reconfiguration of the ground floor uses, a fine urban grain can be achieved to</p>	

<p>the south and west of the scheme, at ground floor level at least.</p>	
<p>The proposed development is, broadly speaking, providing a mix of uses; however, the homezone to the south of the site should be predominantly residential. The commercial units fronting onto this street should be relocated to other areas. As per the above section, smaller commercial units / amenities should be concentrated on the western side of the development. Larger units, including the wide frontage of internal residential amenities, should be concentrated on the north and east elevations.</p> <p>The Planning Authority has raised the fact that the mix does not favour commercial development or local amenities (excluding private amenities for residents). It is the opinion of the Planning Authority that the viability of some commercial units may be in question due in part to the size and spread of those units.</p>	<p>Following receipt of South Dublin County Council's Opinion, the scheme evolved and further progressed through the design process, responding to the feedback of the council. Commercial units have been reduced in number (to provide larger units) and realigned to front onto Belgard Square East with the rest of the local homezone being predominantly residential. These are build-to-sell units with own-door frontage and where possible generous private amenity spaces.</p>
<p>The layout of open spaces within the scheme is not acceptable to the Planning Authority, in respect particularly of public open space. The two pocket parks are not considered to fulfil the role and description of pocket parks, due to their size, siting and surrounding context. The immediate context of these parks is relatively blank facades to the podium (with bike storage at ground level), and commercial units / residential lobbies.</p> <p>It is the opinion of the Planning Authority that the public open space should be consolidated into one space which can provide an adequate level of public amenity.</p>	<p>The provision of open spaces have been revised to provide a more suitable open space for the future residents.</p> <p>The open spaces to the north of the scheme have been maintained, as it is considered that they positively contribute to the scheme. An additional area of public open space has been included along the east west homezone along the south of the site which benefits from a southerly aspect.</p> <p>Please see response to Item 4 above and Cameo & partners Design Statement for full details of open space.</p>
<p>It is the opinion of the Planning Authority that the applicant should seek to integrate between their public realm proposals and the Bus Connects proposals, to ensure there is no abrupt change or spatial disconnect between the edge of their scheme and the edge of the carriageway.</p>	<p>The Bus Connects proposals have been integrated into the public realm consideration at this location. See the Transport Assessment for further details.</p>
<p>Access Transport and Parking</p>	
<p>The Roads Department has provided a report with the following main comments. The full report is in the appendices.</p> <p>1. 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</p>	<p>In response to recommendation No. 1, please see the Architectural Design Statement. The east west route provides improved permeability through the site, allowing for potential widening should the</p>

<p>to maximise the pedestrian, cyclist, and vehicular permeability throughout the site and to the wider masterplan area.</p> <p>2. SDCC recommends a ratio of 0.35 or (130 car parking spaces) 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.</p> <p>3. The applicant is requested to liaise with NTA for any set back required to accommodate works proposed under Bus Connects route this shall be agreed with the NTA and should be implemented as part of the proposed development. Any agreement with NTA must be submitted to the planning authority in support of this application.</p> <p>4. The main vehicular access and egress road onto Belgard Square East shall be 6.0m wide with a 1.8m wide pedestrian footpath.</p> <p>5. The applicant will be required to submit a swept path / Auto track analysis of large cars particularly at parking no. 15, 16 and fire tender access through the entire site.</p>	<p>site to the south be developed in the future. The new route improves access between TUD and Tallaght centre, achieving the objectives of the LAP.</p> <p>In response to recommendation No. 2 the proposed 117no. car parking provision is in line with guidance given in the policy document Sustainable Urban Housing: Design Standards for New Apartments (Guidelines for Planning Authorities), published by the Department of Housing, Planning and Local Government in December 2020 Please refer to the Traffic and Transport Assessment prepared by CS Consulting Group and submitted as part of this application.</p> <p>In response to recommendation No. 3 The applicant has engaged the NTA in regard to the compatibility of the design in regard to future BusConnects scheme. Please see the Transport Report for further detail.</p> <p>In response to recommendation No. 4 Please refer CS Consulting drawings BR-CSC-ZZ-00-DR-C-0003 and BR- CSC-ZZ-00-DR-C-0016, which show the details of the main vehicular access and egress on Belgard Square East. A 6.0m-wide carriageway is provided at this location into the development's undercroft parking area; no pedestrian footpath is however provided, as this is not intended to be used as a pedestrian access.</p> <p>In response to recommendation No. 5 Swept path analyses of the proposed development have been carried out for cars accessing the development and circulating within its undercroft and basement car parking areas (including parking manoeuvres). A swept path analysis has also been conducted for a fire tender travelling through the site inside its southern boundary, along the pedestrian and cyclist route that shall also serve for emergency vehicle access. These analyses, show on CS Consulting drawings BR-CSC-ZZ-00DR-C-0017 and BR-CSC-ZZ-00-DR-C-0018, indicate that the development's access design and internal layout can accommodate these vehicle movements where required.</p>
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<p>6. 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.</p>	<p>In response to recommendation No. 6 Aisle widths within the development's undercroft and basement car parking areas allow a reversing distance of 6.0m at parking spaces, to accommodate car parking manoeuvres. All car parking spaces within the development are 4.8m long by 2.3m wide, in accordance with guidance given in the IStructE Design Recommendations for Multi-Storey and Underground Car Parks.</p>
<p>7. The applicant shall provide a 10% of the overall vehicular parking spaces to be equipped with electrical charging points.</p>	<p>In response to recommendation No. 7 As detailed in section 6.4 of the TTA the proposed development shall have 20% of the total car parking provision equipped with electric charging points, with the remainder future proofed with ducting.</p>
<p>8. SDCC required a mobility impaired provision of 5% of total car parking spaces.</p>	<p>In response to recommendation No. 8 a total of 6 no. disabled-accessible car parking spaces shall be provided on the surface level which achieves the 5% of the total car provision.</p>
<p>9. 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.</p>	<p>In response to recommendation No. 9, all the proposed car parking spaces at the surface level shall be 'future- proofed' for electric charging by the inclusion of ducting and/or cabling to permit the rapid future installation of BEV charging points, as defined 34 L088 Traffic and Transport Assessment in the ESB ecars specification document no. 18017 (Public Charge Points, last reviewed February 2012).</p>
<p>10. 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.</p>	<p>In response to recommendation No. 10 the development shall include a total of 670no. bicycle parking spaces. 490no. secure long-term bicycle storage spaces shall be provided at undercroft level, for the use of development residents, commercial unit staff, and crèche staff. 180no. bicycle parking spaces shall be provided for short-stay use (predominantly by visitors). Of these short-stay spaces, 120no. spaces shall be located at ground level in open space and 60no. spaces shall be located internally at undercroft level. All internal bicycle parking spaces shall be covered.</p>

<p>11. The applicant shall submit Traffic and transport assessment which shall include details on network road traffic analysis, predicted traffic growth and analysis of local junction capacities.</p>	<p>In response to recommendation No. 11 Please refer to section 3, 4 and 5 of the TTA for the details on network road traffic analysis, predicted traffic growth due to the proposed development and analysis of the local junction capacity</p>
<p>12. The applicant shall submit stage 1 Road safety audit for the proposed development.</p>	<p>In response to recommendation No. 12 Please refer Road Safety Audit under separate cover submitted with this planning application.</p>
<p>13. The applicant is requested to submit details of the pedestrian routes within the development.</p>	<p>In response to recommendation No. 13 As detailed in section 7.3 of this reports the pedestrian and cyclists' access to the development shall be accommodated via multiple access points on the site's northern boundary on Belgard Square north, with the main entrance to the reception/concierge located at the northwest corner of the development site. Pedestrian entrances are also present on the eastern boundary of the site as well as a single entrance available on the southern boundary for quick access to one of the bike storage areas.</p>
<p>14. 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.</p>	<p>In response to recommendation No. 14 a Mobility Management Plan has been prepared and submitted under a separate cover with this planning application</p>
<p>15. The management of bin storage needs to be set out clearly.</p>	<p>In response to recommendation No. 15 Bin stores shall be provided on the northern side of the development site by means of two bin stores connected via a hallway. It is proposed that a waste collection point will be allocated along Belgard Square North, on the northern boundary of the development site. For more information on the waste collection strategy, refer to the Operational Waste Management Plan submitted under a separate cover submitted with this application prepared by AWN Consulting for further details.</p>
<p>16. Proposed pedestrian and cycle access between Belgard Road and Belgard Square East at the southern end of the proposed development shall be design for a fire tender to access and egress at this location.</p>	<p>In response to recommendation No. 16 The proposed pedestrian and cycle access between Belgard Road and Belgards Square East at the southern end of the developments shall be used as an access to the fire tender during emergency. Please</p>

<p>17. Prior to commencement, SDCC will require a public lighting scheme to be agreed with South Dublin County Council Lighting Department.</p> <p>18. 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.</p> <p>19. Prior to commencement a developed Construction Demolition and Waste Management Plan shall be agreed by SDCC and lodged on the planning file.</p> <p>20. The applicant/developer is requested to submit accurate plans demonstrating the provision of a visibility splay of 2.0m x 49m in both directions from entrance and exit locations. Sightlines should be shown to the near side edge of the road to the right-hand side of entrance and to the centreline of the road to the left-hand side of the entrance (when exiting).</p> <p>21. 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.</p> <p>22. The proposal shall include the upgrade of local cycle facilities along the frontage of the site.</p>	<p>refer to CS Consulting drawing TBC for further details.</p> <p>In response to recommendation No. 17 For details of the development's proposed public lighting scheme, please refer to the Lighting Masterplan prepared by EQ2 and submitted separately as part of this planning application.</p> <p>In response to recommendation No. 18 The extents of areas proposed to be taken in charge by the Local Authority are indicated on architectural drawings submitted with this planning application. Construction details pertaining to these areas shall be submitted to and agreed with South Dublin County Council prior to construction.</p> <p>In response to recommendation No. 19 An Outline of Construction and Demolition Management Plan shall be submitted under separate cover with this application.</p> <p>In response to recommendation No. 20 An entrance arrangement drawing has been prepared demonstrating that proposed sightlines of 49m to the near side road edge can be achieved from a setback of 2.0m in accordance with Design Manual for Urban Roads and Streets (DMURS). Please refer to CS Consulting drawing no. TBC for further details.</p> <p>In response to recommendation No. 21 The footpath at the existing entrance shall be continued and made good when this access point is closed. The footpath and grass verge shall match the existing and be in line with SDCC taking in charge standards.</p> <p>In response to recommendation No. 22 Existing cycle facilities are in place locally only along Belgard Road, to the east of the development site. The development site does not however extend this far to the east, so does not adjoin these facilities. Accordingly, it is not proposed to upgrade these as part of the proposed development.</p>
<p>Water Services</p>	
<p>There are very little SuDS (Sustainable Drainage Systems) proposed for the development.</p> <p>A concrete tank shall not be used to attenuate surface water because it is not a SuDS system.</p>	<p>Please see the Engineering Services Report prepared by Cronin Sutton:</p> <p>Green/Blue roofs – Green roofs are provided to all roof surfaces as highlighted on C+WOB Architects roof drawing</p>

<p>The applicant shall submit a revised report and drawing to show how surface water will be attenuated by means of SuDS. Show what attenuation capacity proposed SuDS system will have in m</p> <p>SuDS shall be incorporated as much as possible to attenuate/convey surface water runoff. Submit details of same. (Water Quality, and use rainwater for Amenity and Bio Diversity).</p> <p>Carry out soil infiltration tests on site to determine if infiltration SuDS systems are feasible and submit with application.</p> <p>The above comments are recommended to the Board.</p> <p>Irish Water Servicing Issues The Planning Authority raises the servicing issues highlighted by Irish Water in recent SHD proposal in the Cookstown area. The applicant is advised to liaise with Irish Water in relation to servicing the site.</p>	<p>Swales – due to the urban brownfield nature of the site, swales are not possible</p> <p>Filter Drains/Channel rills – due to the urban brownfield nature of the site, swales are not possible</p> <p>Infiltration systems – based on recent experience in the area, it is known that the ground is not conducive to surface water disposal via infiltration</p> <p>Rain Gardens – numerous landscaping soft features are proposed throughout the development at ground level and terraces; refer to CAMEO Landscaping layout drawings Permeable Paving/Asphalt – The full site coverage of the podium structure, coupled with other soft landscaping areas makes permeable paving not possible</p> <p>Tree pits – numerous landscaping soft features are proposed throughout the development at ground level and terraces; refer to CAMEO Landscaping layout drawings</p> <p>Rainwater harvesting – rainwater harvesting is not proposed for the development.</p> <p>SuDS and soft landscaping features within the landscaping at ground level</p> <p>Attenuation tank with flow control device, sized to contain 1-in-100 year storm event and increased by 20% for predicted climate change to limit the surface water discharge from the site during extreme rainfall events.</p> <p>Further discussions took place with Irish Water in advance of submission of this planning application and the statement of design acceptance is included in this report.</p>
<p>Aviation Safety</p>	
<p>It is recommended that the applicant continue to consult with the Irish Aviation Authority and the Department of Defence as necessary, and reach agreement on any matters relating to aviation, prior to lodging the final application.</p>	<p>An Aeronautical Assessment Report has been prepared by O'Dwyer & Jones and is included within this application. Also included is email from Department of Defence.</p>
<p>Waste management The applicant has provided a note on waste management which states that an Operational Waste Management Plan will be lodged as part of the final application. This Plan should indicate where waste will be collected from, and the route waste bins will</p>	<p>An Operational Waste Management Plan has been prepared by AWN and is included within this application this includes details of collection points, storage and routes between.</p>

be taken through the development between storage and collection points.	
Public Realm Planning Report	
<p>1. The applicant states that they are providing c.1,338 sqm (15%); this is in excess of the 10% required under the LAP however the Public Realm Section would have concerns regarding the quality, functionality and amenity value of the public open space provided within the proposed Development.</p> <p>2. Potential effect on amenity due to overshadowing and wind tunnelling effect created by the tall buildings (9-15 storeys)</p> <p>3. The public open space provided is peripheral to the overall development as it is predominantly located along the boundaries of the development, lacks sufficient animation and is dominated by hard surfacing and contains a lack of amenity, functionality and play facilities within the open space proposals.</p> <p>4. Additional information/detail required on proposed play items contained within the landscape proposals. There seems to be insufficient play items proposed within the overall development.</p> <p>5. Additional natural SUDS features should be incorporated into the proposed drainage system for the development such as permeable surfacing, constructed tree pits and rain gardens etc.</p> <p>6. Details of tree pits incorporating SUDS required.</p> <p>7. Details of soft and hard landscaping required.</p>	<p>In response to recommendation No. 1 please see response to Item No. 4 above which sets out rationale and justification for open space provision and public realm.</p> <p>In response to recommendation No. 2 a wind impact assessment is submitted, with the recommended mitigation measures incorporated into the scheme.</p> <p>In response to recommendation No. 3 additional public open space is included along the south of the site with play space</p> <p>In response to recommendation No. 4, 5, 6 and 7 additional information on play items has been included within the Cameo Design Statement.</p>